



North Carolina Department of Environment and Natural Resources
Division of Waste Management

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

January 18, 2012

Mr. John A. K. Tucker, P.E.
Consulting Engineer
P.O. Box 297
Fuquay-Varina, NC

Re: Additional Application Comments
Proposed Transfer Station and Recycling Facility - ARC C&D Recycling
Durham County, DIN 15922

Dear Mr. Tucker:

Below are the additional comments about the application that was received November 28, 2011, for the proposed facility.

1. Financial Assurance – A permit cannot be issued until financial assurance is in place.
2. Facility Plan Drawing – There are two scales shown on the drawing: 1" = 50' and 1" = 100'. Please label correctly.
3. I find Section 1.3 confusing in the use of "sort" and "sorted". I think your intent is the following.
Incoming waste will be unloaded on the concrete pad and recyclables will be pulled from waste and placed in temporary stockpiles on the pad. The temporary stockpiles of recyclables will be placed in rolloff boxes or trailers based on the type of recyclable. The remaining waste will be loaded into waiting open-top transport trailers for landfill disposal. All trailers will be covered prior to transport.
4. Section 2.3 is also confusing. It would be clearer if you divide it into separate paragraphs for each type of material you plan to receive. For example, in the same paragraph you state that you will only accept C&D waste and then state that you will accept non-C&D waste/recyclables. Other issues are listed below.
 - a. C&D waste is defined in both the NCGS and Solid Waste Rules. Both definitions are based on the source, not because of the specific materials. Therefore, I am confused whether the list of "accepted materials" is a list of the only materials that will be accepted or whether they are examples of materials that would be in C&D waste. It is further confusing because brick, block, rock, and uncontaminated soil are examples of beneficial fill that are sometimes separated.
 - b. If non-C&D recyclable will be handled as source-separated material and transferred directly into covered storage containers, why is there a non-C&D sorting area?
 - c. Does the 250 tons per days include the source-separated materials?
 - d. There isn't a statutory or regulatory definition for "clean wood". Please define what you mean by "clean" wood waste.

- e. Although you have mentioned the possibility of accepting non-C&D recyclables subject to approval by DENR, none are mentioned in the application. Therefore, for the permit I'm assuming that you won't be accepting these materials.
5. Hazardous Waste Contacts – Typically I don't see a list included in the application. It may be better to reference that you will keep the information at the facility and review/update on a specific schedule. These are some problems with what you have included.
 - a. Two sets of the list of hazardous waste contacts were in the document.
 - b. It appears that the availability and local phone numbers are not verified "before an emergency" or modified as needed as stated. This is because the opening paragraph states that that the contacts were taken from a web site in early 2007, approximately five years ago, and it references a web site which no longer exists.
 - c. If you want to include a specific list, you need to have correct information and maintain it as stated.
6. Useful Agencies and Contacts – This list has problems similar to the hazardous waste contacts. I know that many of the phone numbers are incorrect because DENR moved to Green Square. I can't tell if all of the contacts are still valid, but I know that Craig Brown, the contact for Region 4 PCBs, retired several years ago.
7. Section 2.6.3 - Please add a sentence indicated that you consider the source of the waste in your selection of a landfill for disposal. For example, Shotwell can only receive waste generated in Wake and Johnston Counties.
8. Could you provide a full size drawing of the Overall Site Plan? There is a lot of information on the drawing and it is difficult to read on the smaller drawing.

If you have any questions, please contact me at (919) 707-8257 or by email at pat.backus@ncdenr.gov.

Sincerely,



Patricia Backus, P.E.
Environmental Engineer
Solid Waste Section

cc: Ronnie Petty, A-1 Sandrock Inc.
Ed Mussler, P.E., Permitting Branch Head
Dennis Shackelford, Easter District Supervisor
John Patrone, Environmental Senior Specialist