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

Beverly Eaves Perdue  
Governor

Dexter R. Matthews  
Director

Dee Freeman  
Secretary

November 4, 2011

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

Re: Initial Application Review  
Proposed C&D Transfer Station and Recycling Facility  
Durham County

Dear Mr. Tucker:

The Division of Waste Management, Solid Waste Section received your request for a permit to operate a construction and demolition debris transfer station on South Hoover Road in Durham on September 1, 2011. I have obtained some revisions to the original application based on conversation and email. This letter continues the comments on the application.

Please provide a response for each item and/or revise the application as necessary.

1. Several different parties are listed in the application and in the supporting deeds and lease agreements. The application needs to be consistent and clarify relationships.
  - a. The title page lists "Absolute Recycling Contractors", the table of contents has "A-1 Sandrock, Inc. C&D Transfer Stations and Recycling Center, and "ARC C&D Recycling Center" is shown in the footers of the operation plan. Please clarify the name of the facility . The application needs to be changed to reflect what is correct.
  - b. According to the parcel report on the Durham County GIS and deed listed for the property, the property is owned by ALCAN Associates Limited Partnership (Deed Book 2814, Page 166-170). The lease agreement is stated to be between Tidewater Fibre Corp. and A-1 Sandrock. You need to indicate how Tidewater is related to ALCAN and how Absolute Recycling Contractors is related to A-1 Sandrock [dependent on an changes based on 1(a) ].
  - c. We did not provide a certification by land owner for a corporation in the packet I sent you. I will accept was you have provided if you can provide a statement that indicates how the person that signed is authorized by the property owner, ALCAN Associates Limited Partnership. Does the Secretary of State in Virginia have annual reports similar to North Carolina, which state the names in the partnership?

2. As stated in a previous e-mail and the guidance sent to you, a traffic study is required for transfer station. This is a statutory requirement addressed in NCGS 130A-295.5. This requirement may be satisfied by obtaining a certification for the NC DOT. The General Assembly did not provide a threshold for requiring a traffic study.
3. A layout of the transfer station and operations is needed.
4. The Fire Occurrence Report need to be updated to the more recent version available online at <http://portal.ncdenr.org/web/wm/sw/forms>.
5. The contact information listed in 1.4.3 is no longer correct. Durham County is now part of the Fayetteville Regional Office and the Environmental Senior Specialist assigned to Durham County is John Patrone. The contact information can be found by select "Field Operations Branch" under the Staff Maps at <http://portal.ncdenr.org/web/wm/sw>.
6. The acceptable waste listed in Section 2.3 included C&D waste. The waste the facility is allowed to receive as listed in Section 2.0 is stated as Land Clearing Inert Debris. This section also states that "construction and demolition debris – except clean wood waste" is prohibited. There are also areas that are inconsistent or confusing. For example, household hazardous waste may be exempt from RCRA hazardous regulation, but it is not exempt from regulation. It is still a solid waste. If you are only receiving C&D waste, I do not understand why you have all the information on hazardous waste and other disposal. Normally I would expect to see a reference to contacting the local hazardous waste response. Please review the application for this problem.

I will review and revisions that you provide and will provide additional guidance as I continue my review of the application.

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

Sincerely,



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

cc: Ed Mussler, P.E., Permitting Branch Head