



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor

William G. Ross Jr., Secretary

March 3, 2008

Mr. Stephen A. Gilbert  
Lincoln County Public Works Director  
115 West Main Street  
2<sup>nd</sup> Floor Citizens Center  
Lincolnton, N.C. 28092

Re: December 5, 2007 Facility Compliance Audit

Dear Mr. Gilbert,

Thank you for your correspondence dated February 25, 2008. In response, there are several reasons the Solid Waste Section is requiring the changes you noted in your letter to yard waste facilities. Please consider the following two reasons.

As you stated, the Lincoln County Solid Waste Management facility is permitted to accept "yard waste", as defined in NCAC 13B .101 (46) (i.e. "Yard Waste" means "Yard Trash" and "Land-clearing Debris" as defined in G.S. 130A-290, including stumps, limbs, leaves, grass, and untreated wood.). "Yard trash" is defined as solid waste resulting from landscaping and yard maintenance such as brush, grass, tree limbs, and similar vegetative material [NCAC 13B .101 (55)]. State rules emphasize the need for wastes such as yard trash to be separated and composted because it is more likely to contain pathogens and toxins (e.g. herbicides, pesticides, fecal material) that may be harmful at the point of end use (see NCAC 13B .1400 rules). In Lincoln County's case, the points of end use mentioned in the December 5 audit are public schools and citizens who use it for landscaping purposes. If yard trash is not composted the exposure routes in the aforementioned examples are numerous and difficult to control unless some form of pathogen and toxin reduction is utilized. The Type I composting process is required for yard trash because the extended elevation of temperatures (3 days above 131°F) during the composting process reduces harmful substances from the waste and creates a material suitable for use as a soil conditioner.

The second reason for requiring the yard trash operational improvements at Lincoln County's facility is because of the recent outbreak of spontaneous combustion of yard waste disposal areas cause by the "green" material contained in yard trash at several facilities across the state. Fire fighting and suppression at these facilities has been expensive and has caused several state agencies to initiate compliance action. To prevent further similar occurrences Section staff have been instructed to redoubled their efforts to closely inspect yard waste areas and inform facility operators of the potential dangers that yard trash and other green material may cause if it is not separated and composted in accordance with the rules.

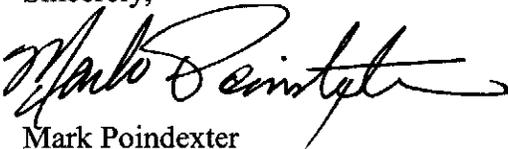
1646 Mail Service Center, Raleigh, North Carolina 27699-1646  
Phone 919-508-8400 \ FAX 919-715-3605 \ Internet <http://wastenotnc.org>

It is my understanding that Mr. Gerstell has given Lincoln County verbal approval to implement your consultant's (S&ME) proposal to compost (rather than remove from site) yard trash that was accepted at the site prior to the facility audit. Mr. Gerstell was informed by County staff that the facility has stopped accepting yard trash.

The County may want to get approval to conduct a compost demonstration project while preparing a permit modification. A demonstration project may be useful for the County in assessing the benefits of operating a composting operation and familiarize your staff with the process, while generating a product that is more beneficial and safe.

I hope this explanation has been useful. Please feel free to contact me if you have further questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Poindexter", written in a cursive style.

Mark Poindexter  
Field Operations Branch  
Solid Waste Section

cc: Deb Aja  
central file