



Innovative Construction Waste Solutions

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March 18, 2011

Drew Hammonds
Environmental Senior Specialist
NCDENR, DWM
Solid Waste Section
225 Green Street, Suite 714
Fayetteville, NC 28301

RE: Audit Report Reply
Transfer Facility 2611-T

Mr Hammonds,

I am responding to your audit report comments per your site visit on February 3, 2011:

- Item 4: Our permit actually expires February 2013, not 2012...assume this to be a typographical issue.
- Item 5: Our facility though permitted to receive demolition waste, at this time only receives new construction debris. Any material coming from a demolition related project is required to provide ACM inspection and State Notification certification for demolition to structures in North Carolina.
- Item 13: The material is being processed to accommodate the current market and will be resolved in a timely manner.
- Item 11: Our facility does not receive scrap tires; however any errant scrap tires disposed at the facility are promptly removed from the debris and the tire is placed in the bed of the supervisor's pickup and placed in an enclosed container or hauled directly to the Ann St Landfill Scrap Tire Collection Site for final disposal. The customer is notified of the issue and charged a fee for each tire discovered.
- Item 15: The permitted facility operates on a small portion of a much larger tract of land. The company has various operations on the larger tract and receives clean wood chips/mulch, scrap metal, concrete and asphalt for crushing etc. These activities are maintained outside the boundary of the permitted facility and should not interfere, effect or be regulated by the operations of the permitted area.

Item 16: Of the two containers behind our office that you are referring to, one has product that is being stored for sale and the other is a used container that was purchased by our roll-off division as a dewatering box and has never been used. This can has been policed to remove the small amount of material you are referring to and been disposed. It is noted that these containers are more than 200 feet from the permitted area, secure and are not a part of the permitted area operations.

Item 17: The boiler fuel behind the office has been delivered to market and is no longer there.

Item 18: All full containers are removed from the facility within the specified time of 24 / 48 / 72 hours. All waste and recyclables is cleared from the tip pad daily and except for wood and concrete placed in containers. You state that "there were full containers on site at the time of the audit". Our operations plan allows for full containers to be managed on site for a brief time as allocated above of which they always are. I am confused by the comment?

The scrap metal is a product that has been removed from the waste stream and depending on market or shipment of material may from time to time be placed in our scrap metal storage area that is not a part of the permitted area. As a buyer of scrap metal this operation and area is independent of the mixed C&D waste and would not expect that operation, like all scrap peddlers and processing would not be regulated as a solid waste.

The 'broken excavator' was having a motor replaced and that machine was operational in a few days after your visit. We did rent an excavator to supplement our operations. It is noted that we have many excavators, loaders and skidsteers along with rented equipment that support all company operations. We diligently support our permitted operations with necessary equipment.

Item 20: We do occasionally receive loads of soil of which our crews will remove the larger waste and we will screen the soil to remove any remnants of waste so the clean soil can be recycled. It is noted however that the material in question has been removed and transferred to the landfill for disposal.

Item 21: Our property has an active Erosion Control permit of which all required measures are maintained in accordance with the plan.

Item 22: The shingles that were stored on the ground have been removed to a facility that has the required operations plan for use.

Item 23: No grinding of shingles has ever occurred on our property and no wood is ground within the permitted boundary.

Items 9, 14 & 19 Our facility has developed a unique business model that allows for its successful recovery rate. The methods, procedures, markets, customers and products are all confidential and proprietary information that should the public, including competitors or future customers have access directly or indirectly to this information would be extremely harmful to our company. You mention directly or reference our markets, products, customers or locations of other operations in your reporting. Should this proprietary information be posted on line or made available to the public our business would be irreparably harmed.

I respectfully request that you screen your reports and black-out or completely remove any reference to the recyclable materials we are recovering, mention of customers, our general markets or other location of operations.

As always, I thank you for your assistance in our compliance issues. Should you have any questions I will remain the administrative contact.

Sincerely

A handwritten signature in cursive script that reads "Bill".

William M Hester