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Backus	10/07/2010	10794	41-16



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

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

October 7, 2010

Mr. Vernon Smith
Vice President
WCA of High Point, LLC
5830 Riverdale Drive
Jamestown, NC 27282

Re: Substantial Permit Amendment Application
WCA of High Point
Construction and Demolition Landfill (C&DLF) and Reclamation Facility
Permit No. 41-16, Guilford County, Document ID 10794

Dear Mr. Smith:

On June 7, 2010, the Division of Waste Management, Solid Waste Section (Section) received an application for a substantial permit amendment for the WCA of High Point CDLF and Reclamation Facility (Document ID 10793). The application was submitted on your behalf by David Garrett & Associates. You were invoiced for the appropriate application fee and payment was received on July 15, 2010.

Your application has been determined to be complete within the context of N.C.G.S. §130A-295.8(e). A determination of completeness means that the application includes required components, but does not mean that the components provide all the information that is required for the Section to make a decision on the application.

A technical review of the application was also made. Please address the following comments or questions concerning the application. Modify the application or plan where appropriate.

Application Format

All applications and plans required by Rules .0531 through .0547 of Section 15A NCAC 13B must be prepared in accordance with 15A NCAC 13B .0533 (b).

1. The sheet size of drawings should be at least 22 inches by 34 inches. Since the drawings at the end of Section 2, were previously provided in a larger size and have not been changed, I will accept those in the 8½ x 11 format. However, I do need to be able to see the drawings in Section 3. Please provide larger drawings.
2. Based on the sheet size provided, the scale on drawing SA1 (Figure A) is incorrect. The drawings that you are presenting for me to review should be to an accurate scale.
3. Drawing SA2 (Figure B) states that scale is "as shown"; however, no scale is shown.
4. The date of the drawings, June 2010, is after the seal date, April 13, 2010.

Application Requirements

A substantial amendment to the permit must be prepared in accordance with Paragraph (c) of Rule .0535 as stated in 15A NCAC 13B .0533(a) (3). A complete application must contain local government approval in accordance with Subparagraph (c) (11) of Rule .0536.

1. The application did not include documentation of public notice, mailings to property owners sharing a common border, content of mailings and notices, or documentation of the public meeting as required under 15A NCAC 13B .0536(c)(11)(C)-(E).

Operations Plan Amendment

2. In the second paragraph of the 1.0 Foreword, it is stated the recycling facility has ample space for pallets and cardboard as shown on Figure B. Yet, in the 3.3 Operation Conditions, it is stated that source separated wood pallets must be directly unloaded onto the sorted clean wood pile or in a wood materials container and cardboard must be unloaded directly into a storage container. Please explain the purpose of the "PALLET" area shown in Drawing SA-2?
3. The first sentence of the Operating Conditions should be changed to read the following:
Source separated wood pallets and cardboard from non-C&D waste sources may be accepted at the facility for recycling, but the materials must not be unloaded onto the general tipping floor (where the C&D wastes are unloaded). Rather, wood pallets must be directly unloaded onto the sorted clean wood pile or into a wood materials container, and cardboard must be unloaded directly into a storage container.
4. The first sentence in the second paragraph of 3.3 Operating Conditions states that non-recyclables materials may arrive with load of pallets and cardboard. If the wood pallets and cardboard are source separated, there shouldn't be any non-recyclable materials.
5. I would prefer that the appropriate pages of the operations plan be modified or replaced. This can be done by using the same page format and putting in the revision date, and engineering firm.
6. In the past the storage areas on the reclamation facility plan were labeled with the materials. In 2.1.5 it is noted that Drawing OP-1 has a layout of the designated storage areas. Please add this back on your drawing.

If you have any questions regarding this matter, please contact me at (919) 508-8520 or by email at pat.backus@ncdenr.gov.

Sincerely,



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

cc: David Garrett, P.G., P.E., David Garrett & Associates
John Walker, WCA Waste Corporation
Ed Mussler, P. E., DWM Jason Watkins, DWM
Hugh Jernigan, DWM