APPROVED
DIVISION OF WASTE MANAGEMENT
SOLID WASTE SECTION
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CONSTRUCTION AND DEMOLITION AND MSW TREATMENT AND PROCESSING FACILITY OPERATIONS PLAN FOR 3001 HOLTS CHAPEL ROAD.

PER THE GUIDANCE for PREPARATION of PERMIT APPLICATIONS for MSW/CONSTRUCTION & DEMOLITION TREATMENT AND PROCESSING FACILITIES (found on the wastenotnc.org NCDENR-Division of Waste Management web site-attached)

ADDENDUM TO MODIFICATION MARCH 28TH, 2007
MODIFICATION FEBRUARY 23RD, 2007
Final Revision Dated February 21st, 2005
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Submitted original October 22nd, 2004

Salvage America, Inc.

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OPERATIONS PLAN- Modification for Commercial Stream

Please also review attached site plan

A. Summary

1. The purpose of our business will be the recycling, reuse, transfer and disposal of commercial waste. We have a scales system next to our concrete pad where we operate a treatment and processing facility. Located next to the concrete pad or tipping area we also have a covered shelter area, which will house unacceptable material until time of final removal from our facility.

The acceptance of material will be typical of other facilities. We shall weigh vehicles upon entry prior to tipping and then outgoing after tipping to calculate tipping fees. We shall have signage posted dictating acceptable and unacceptable material as well as the tipping fee rates. We shall store the various types of material received in separate containers and areas. These containers will vary dependant on material type and quantity and will be discussed in more detail below. We will also discuss screening plans for all types of material and final disposal.

B. Our facility will accept commercial waste

i. Acceptable Material is as follows: ferrous and non-ferrous metal, concrete, brick, wood, sheetrock, shingles, duct work, piping, land clearing and other types of inert debris and items such as cardboard, shingle wrappings, plastics, carpet and similar materials that have been generated at a commercial site. These materials are equal to our current C&D flow of material.

ii. Unacceptable Material is as follows: tires, yard waste, large stumps, hazardous waste, chemicals, radioactive waste, infectious waste, residential trash or garbage, abandoned house trailers, liquid wastes, batteries, asbestos, petroleum products and any waste deemed unacceptable by the recycling station personnel.

C. (2b. A material screening plan, including a list of the unacceptable material, by-pass material, and recyclable material and proper management of these materials.) Please refer to section B.i and ii for acceptable and unacceptable materials. Of the acceptable materials, the following is a breakdown of what we can recycle vs. what will be bypass:

1. Recyclable/Reusable material
   i. Treated wood
   ii. Wood- dimensional, pallets, engineered
   iii. Ferrous/ Non-Ferrous scrap (metal)
   iv. Concrete
   v. Brick
   vi. Land-clearing
   vii. Vinyl/PVC- and other plastics

viii. Cardboard/un-waxed paper
ix. Drywall **
x. Roofing material
xi. Insulation

2. Bypass Material
   i. Roofing Material
   ii. Drywall **
   iii. Insulation
   iv. Carpet
   v. Other types of plastics and paper

**Noted- not a target recyclable/reusable material now, but we hope for it to be in the near future.

Bear in mind that a considerable portion of Recycling/Reusable material will be contaminated and will become bypass.

Our materials screening plan will function on the fundamentals of waste screening. These fundamentals include: knowing your generators and haulers, developing standard procedures, training employees in those procedures, practicing random load checking, educating generators and haulers and instituting manifest for special waste acceptance.

a. Knowledge of our generators and haulers will help us to better gauge our tonnage and recycling capability as well as flag unknown or questionable haulers.
b. Developing standard procedures- One standard will be for our personnel to be trained to identify suspicious wastes based on visual and olfactory characteristics such as hazardous placarding or markings, Liquids, powders or dusts, sludge, bright or unusual colors, drums or commercial size containers, chemical odors, and smoke. If a suspicious waste is then identified a script (example page 9 Random Load Checking Program) will be followed to assure proper handling of the situation. Other such standards may include; use of protective clothing, questioning the driver, reviewing the manifest, contacting the possible source, calling the proper state agency, laboratory agency, and/or regulatory agency.
c. Random load checking- We will randomly check one percent of our overall tonnage. (weekly if we take in 1500 tons, we need to check 15 tons per week). We also have the ability to check suspicious loads at any time. We will have a designated corner of our pad marked off with paint for this process. We shall utilize manpower along with either our skid steer or track-hoe to sort and separate the tipped pile. If hazardous waste is found, we will contact Ecoflo for proper disposal. If no hazardous waste is found, the heavy equipment can push it over to the main area.
   We will randomly select loads to be screened by utilizing a Random Digit Table (included)(the table is utilized by dropping an item such as a paper clip on to the table with closed eyes and then reading the two numbers to the top right of the clip head). We will start out selecting 1 out of 100 vehicles. If that does not cover 1% of loads by weight we will drop the number to 1 out of 75 or less to attain the proper goal.

d. Educating generators and haulers and instituting manifest for special waste-Flyers and other written signs will be readily available and visible. Our personnel will also educate our customers of what we can and cannot accept.

D. (2c). A plan for the management of unacceptable materials including storage conditions and storage time prior to disposal in a specified landfill.
((PLEASE SEE SITE PLAN FOR VISUAL DETAILS))

1. Hopefully, unacceptable material will be kept to a minimum on our tipping floor through the follow through of the above-mentioned screening fundamentals. However, unacceptable waste from such items as tires to residential trash will occur. These items will be stored separately, in bins under roof on our separate covered shelter. Such items as tires that need separation, will be stock piled in an area until a measurable quantity accrues to require hauling to Central Carolina Tire and Disposal or the Bishop Road Tire Disposal facility. All hazardous, chemical, radioactive, infectious waste, and/or petroleum products will be handled by Ecoflo (of Greensboro). Residential, and or household trash, automobile parts (not reusable to scrap yard) and abandoned house trailers shall be brought to the White St landfill. Batteries shall be disposed of at Battery Warehouse and Recycling. Asbestos will be disposed of by Abatemasters of Winston-Salem.

   Storage time will vary based on the item. For example, hazardous wastes will be disposed of immediately. Conversely, tires shall stay under the covered shelter until a truckload is accumulated. Then we shall haul it off in a more cost effective manner. The practice of storing material until a full truckload shall be followed on all materials (that do not present an immediate danger).

Unacceptable Material is as follows: tires, large stumps, hazardous waste, chemicals, radioactive waste, infectious waste, residential trash or garbage, abandoned house trailers, liquid wastes, batteries, asbestos, petroleum products and any waste deemed unacceptable by the recycling station personnel.

E. (2d. A plan for the management of by-pass material including storage conditions and storage time prior to disposal in a specified landfill)
((PLEASE SEE SITE PLAN FOR VISUAL DETAILS))

1. All of our by-pass material shall be taken a properly permitted landfill (Uwharrie Landfill, Bishop Road Transfer Station, Burnt Poplar Road Transfer Station).
2. Bypass material will be loaded via track hoe or skid steer daily off of the tipping floor and hauled daily to the landfill. We shall have one open top trailer to utilize for hauling the by-pass material.
3. Based on tonnage, we will be making several trips to the landfills. All

By-pass material that hits the tipping floor shall be placed in trailers by the end of each business day. If a partial load is left in a trailer, the tarp will be secured to prohibit water penetration.

F. (2e. A management plan for separating and processing recyclable material including storage conditions and storage times prior to separation, processing, and removal from the site.) ((PLEASE SEE SITE PLAN FOR VISUAL DETAILS))

1. We shall utilize a track-hoe with thumb and skid steer for initial separation of material. Dependant on size and weight of material, we will also have personnel pulling out recyclable/reusable material by hand. Our various entities that will receive these items will either be called to pick up or we will deliver based on volume and our agreement terms. Details on this process will be explained in more detail in (2h).
2. We will have separate containers and areas assigned for such material as ferrous metal, non-ferrous metal, lumber, vinyl, PVC, plastics, cardboard, drywall, and roofing material. These items will be sorted by both manpower and heavy equipment and placed into the corresponding storage area.
3. Initial separation and placement into each material's specified bin occurs daily. Storage time will be dependant on accumulation.
4. Processing of material will occur daily. We have two balers. We utilize these to process/compact many of our recyclables from cardboard to plastic, wire to paper.
5. We will also be grinding our wood on a monthly basis with our tub grinder. We will load out the grinds onto trailers for shipping to our buyers.
6. Below is a breakdown of RECYCLABLE material and end user

MATERIAL	ENTITY
Wood, Land-clearing	Environmental Recycling Alternatives, Inc.
Roofing Material	Page Construction
Processed Mulch	Environmental Recycling Alternatives, Inc.
Ferrous Metal	Atlantic Scrap and Processing
Non-ferrous Metal	Atlantic Scrap and Processing
Cardboard	Paper Stock Dealers
Vinyl/PVC/plastic	Reilly Recovery Systems
Concrete, brick	Page Construction

7. We anticipate removing these items from site well with in the allotted quarterly basis. Again, much will depend on quantity and quality of the tipped material.
8. I have included a site map showing locations of the ground wells. This map comes from a Semi-Annual Groundwater report from Vopak USA, Inc./Bascor Environmental, Inc. I have also included an excerpt from a Phase One conducted in 2004 by Pyramid Environmental, which points out that monthly maintenance and semi-annual monitoring and reporting will continue by the former landowner-Univar. As the map depicts, the wells are located on the Northern and Northwestern portions of the parcel.

We do not intend to use any of the Northern and Northwestern portions of the property in our day-to-day operations, as our operations plan suggests. Therefore, we should not affect nor impede any maintenance and/or monitoring that will occur.

9. In the event that our containers and areas for recoverable material become full, we will have to immediately redirect all flow of tipped material directly to our by-pass trailer. The by-pass trailer when full goes directly to the landfill. We will lose that revenue we could have salvaged through dumping and sorting, but will gain time to "catch up". In the event that we become "overrun" on our tipping floor, we will be forced to turn down customers, until such time as we get the situation under control. If that does occur we will offer those customers we turned down an incentive come back and utilize our facility in the future.

10. Our revised plan shows several storage areas. Within these areas we have multiple containers which include 2-20' box metal containers, 2-40' box metal containers, and 5-48' van trailers. We also have several roll offs provided to us by customers who buy our recycled material. We also have a 50' walking floor trailer and a 36' Dorsey dump trailer. We utilize our Mack truck to move the van trailers, the walking floor and the Dorsey. Our trackhoe/ or skid steer moves the others. Our customers also use their trucks to move some containers.
11. If our machinery does go down we will need to rent machinery from one of the local rental stores such as MSP rents, Volvo rents and the like. The cost of renting will be minimal compared to potential down time of the facility.
12. With our tipping floor operation we feel that the use of a track hoe and skid steer will be sufficient in handling our dump and sort operation. We have seen other operations that function well with this type of equipment. We also have several pieces of equipment to process material. We have a WHO tub grinder to grind our wood waste into mulch and/or boiler fuel. Also, we have two balers two compact material.
13. As discussed, we feel that LCID loads are typically segregated and can be dumped in the designated area with little to no separation required. With mixed loads it will be a question of trial and error. Whether we need to set up a container or if it is more cost effective to just bypass the material are decisions we will need to make on a daily basis. LCID will be minimal with the commercial waste stream

14. Most, if not all of our commercial waste will be coming from the Guilford County area. However, we can accept waste from the surrounding counties. The Burnt Poplar transfer station and Uwharrie Landfill can receive waste from surrounding counties, therefore we can properly dispose of our by-pass material.

1. (2f. Specific information regarding the type and capability of the processing, separation, and loading equipment)

    1. We will be utilizing two main pieces of loading and separating equipment: the Daewoo 175 Track-hoe with thumb and the Caterpillar 252 skid steer with pneumatic tires.
        i. Other equipment used by personnel: rakes, shovel, tarps, etc.
    2. Our main piece of processing equipment will be a tub grinder: WHO tub grinder with magnetic pulley and grapple
    3. We have two balers- one vertical and one horizontal. We use these pieces of equipment to compact a variety of material such as cardboard, plastics and wire.
        i. Other equipment used will be hand operated saws and cleaning equipment such as hoses.

2. (2h. A narrative regarding listing of all proposed end uses for the recycled materials, including the name and location of the entity receiving the proposed materials. Letters of intent are sufficient for this item. If the information in this item is considered confidential, then documents shall be stamped as such and the Solid Waste Section will handle in accordance with applicable General Statutes.)

MATERIAL	ENTITY	LOCATION	USE
Wood, Land-clearing	Environmental Recycling Alternatives, Inc.	High-Point	Mulch, Fuel
Roofing Material	Page Construction	Kernersville	roofing material
Ferrous Metal	Atlantic Scrap and Processing	Kernersville	various
Non-ferrous Metal	Atlantic Scrap and Processing	Kernersville	vavious
Cardboard	Paper Stock Dealers	Greensboro	cardboard
Vinyl/PVC	Reilly Recovery Systems**	Pilot Mountain	various
Concrete, brick	Page Construction	Kernersville	building material

    1. Our method of transfer of material will vary with each partnership.
        a. Environmental Recycling- we will ship to them and they will also come pick up.
        b. Page Construction- we will ship to them and they will also come pick up
        c. Atlantic Scrap- we will ship to them and they will pick up
        d. Paper Stock Dealers- we will ship to them and they will also come pick up.
        e. Reilly Recovery Systems- we will ship to them and they will also come pick up

It is necessary to conclude that the more we recycle the better it is for the environment and for our prosperity as a company.

3. (2i.Letter from the local fire marshal/chief of the appropriate fire department that has jurisdiction over this facility that a incident at this facility will be responded to with the appropriate equipment)

a. 3001 Holts Chapel Road, Greensboro, NC is in Fire Chief Johnny Teeters District. Fire Station #7 on Gatewood Avenue will handle our facility if the situation ever arises. We will receive a letter from Assistant Fire Marshall Chief Lindsay once the City grants us our building permit

4. (j. A narrative describing how Asbestos Containing Materials (ACM's) will be screened for and how such materials will be handled if received (an approval letter from the Health Hazards Control Branch addressing an approved plan.)
    a. It will be treated as a harmful hazardous waste. Please Review the Hazardous and Other Waste Identification and Procedures document below.
        i. Abatemasters- John Tesh 336-731-4396 out of Winston-Salem
        ii. However, due to the fact that we will be accepting only New Construction Waste- we are not required to have a letter from the HHCB

SALVAGE AMERICA, INC.
RANDOM LOAD CHECKING PROGRAM

SECTION: Transfer and processing Facility
SUBJECT: Random Load Inspection

POLICY
The personnel of Salvage America, Inc. will randomly inspect loads of waste being tipped at our Treatment and Processing Facility

PURPOSE
To ensure that hazardous or other prohibited waste material are not being disposed of at our Salvage America, Inc. Treatment and Processing facility.

PROCEDURE

2. Randomly select a load for inspection and ask the driver to stop in a designated area.
3. Record the following information on a Waste Inspection Form prior to allowing the driver to dump the load: (see attached form)
    a. Name of hauler
    b. Name of waste generator
    c. Type of waste
    d. License plate number
    e. Truck number
    f. Name of driver
    g. Signature of driver
4. Ask driver to dump the load in the designated area. The driver is not required to stay onsite while the load is being inspected.
5. Spread out the waste using a rake or skid steer/track-hoe, if required.
6. Record any potentially recyclable materials.
7. Inspect the load for hazardous or prohibited waste materials. If such materials are found then do the following:
    a. Isolate the waste and contact the Superintendant if the waste material poses an immediate risk to human health or the environment.
    b. Record the information on the Waste Inspection Form.
    c. Take photographs of the material.
    d. Attempt to confirm information on the generator of the waste.
    e. Contact the hauler or generator of the waste material and require them to remove the material from the facility
    f. If the waste materials are considered hazardous, notify the Public Health Department of the County of Guilford, at 336-641-7777, and/or Ecoflo at (800) 999-6510.
8. Complete and sign the Waste Inspection Form.

9. Send a letter to the generators of the recyclable materials advising them that we are able to recycle such material now and in the future.

Record keeping

1. A Waste Inspection Form will be completed for each load inspected and will be kept on file at our office.
2. If hazardous waste materials are identified, a copy of the Waste Inspection Form and a summary of the action taken will be forwarded to the Guilford County Health Department.
3. Photographs of hazardous waste materials will be filed with the appropriate Waste Inspection Form.

Safety Considerations

1. The personnel will wear the following safety clothing during inspections:
    a. coveralls
    b. safety boots
    c. gloves
    d. face mask as required
    e. eye protection

Inspection Frequency

Inspections will occur randomly as required based on 1% of tonnage taken in monthly.

WASTE INSPECTION FORM

Salvage America Treatment and Processing Facility
INSPECTION REPORT

Date:_____ **Day: Mon Tues Wed Thur Fri Sat Sun**

Track hoe _____
Skid steer _____
Loader _____
Roll Off _____
Trailer _____

Hauler_____

WSA Number: Green_____ **Red** _____

Fleet Number _____ **Driver**_____

Time In:_____ **License Number** _____

Time Out: _____ **Location of Sort** _____

Front of Load	**Back of Load**
A	**C**
B	**D**

Comments

_____
_____
_____
_____
_____
_____
_____
_____

Hazardous and Other Waste Identification and Procedures

Hazardous Waste

The agency's responsibility and concern for the safety of its employees is especially great regarding the handling of hazardous waste. Consequently, the following hazardous waste procedural policy has been established.

Employees will:

Remain aware of all incoming loads.

Be alert to any smoke, unusual odor, fumes, or vapors emitting from a load of solid waste.

Look for materials labeled with hazard warnings. This may be a picture, symbol or warning word.

Clear the area of all personnel and private citizens, and notify supervisor immediately if a suspicious or questionable material is spotted. The supervisor will assess the situation, call for help as needed, (Emergency information and telephone numbers are posted.), and determine when work in the area may resume.

Notify supervisor immediately if feeling dizzy, nauseous, skin itches or burns, eyes, nose, or throat become irritated, or any sudden, unusual symptoms of illness develop.

Employees are not to attempt moving or handling waste suspected to be hazardous without the instruction of the supervisor.