

## David Garrett & Associates

Engineering and Geology

April 8, 2008

Mr. Karim Pathan  
Environmental Engineer  
NC DENR Division of Waste Management  
Solid Waste Section  
1646 Mail Service Center  
Raleigh, North Carolina 27699-1646

Re: Response to Comments for Permit Application  
Burnt Poplar C&D Transfer Station  
Greensboro, Guilford County, North Carolina  
Permit No. 41-xxT (P1171)



Dear Mr. Pathan:

On behalf of MRR Southern, LLC, Burnt Poplar Transfer, LLC and WCA Waste Systems, Inc., a proposed C&D transfer station located within the City of Greensboro, I am pleased to offer the following responses to your review letter dated March 27, 2008.

The project developers anticipate less recycling than originally discussed in the December 2007 Operations Plan. Metal and cardboard will be removed from the waste stream and will be stored in roll-off boxes or transport trailers – either with the capability of being covered with tarps during inclement weather. All other recycling activities are planned to occur at the WCA of High Point, LLC landfill and recycling facility (Permit #41-16), a WCA affiliate, located near the City of High Point, North Carolina (within Guilford County).

This transfer station will serve primarily as a collection center and will supply materials to WCA of High Point. In the event that WCA of High Point, LLC, cannot receive the materials shipped from Burnt Poplar Road Transfer, LLC (e.g., inaccessibility due to weather or equipment malfunction, etc.), a backup disposal site is Cobles C&D Landfill (Permit #01-05), located near the Town of Liberty, North Carolina (within Alamance County).

The following responses to your comments are presented in the order received in your letter dated March 27, 2008. Changes to the Operations Plan document are pending (the current revision is provided for your review) and will be finalized once these amendments are approved by the Division of Waste Management.

1. *Identify the service area from where the waste will be received. Please confirm that the service areas for the transfer facility and disposal facility are same.*

The service area will be the same as the more restrictive of either of the potential disposal facilities. The service area for WCA of High Point, LLC (Permit 41-16) includes Guilford, Forsyth, Randolph, and Davidson Counties, which will be service area for Burnt Poplar Transfer, LLC. The service area for Cobles C&D Landfill (Permit #01-05) covers a wider geographic area, including Alamance, Cabarrus, Caswell, Chatham, Davidson, Durham, Forsyth, Green, Guilford, Lee, Orange, Randolph, Rockingham, and Wake Counties.

2. *Provide the traffic study or NCDOT waiver as required by Statute 130A- 295.5.*

A traffic impact evaluation was performed by the City of Greensboro Department of Transportation in conjunction with NCDOT Division 7. The evaluation found no impact anticipated to the local highways and streets associated with the project. Please refer to the attached letter from the NCDOT Division 7 Engineer, dated October 24, 2007 (presented as **Attachment 1** to this document).

3. *Provide the name and permit number for the disposal facility.*

The primary disposal site is WCA of High Point, LLC (Permit #41-16); the backup disposal site is Cobles C&D Landfill (Permit #01-05).

4. *There is a discrepancy in the hours of operation in Section 3.6 and the facility sign shown on the cover sheet of the drawings. Please address a need for fluctuation of operating hours.*

The transfer station will be open to the public from 6:30 AM to 5:30 PM Monday – Friday and from 7:00 AM to 1:00 PM Saturday (closed Sunday). Operations with no public access (i.e., material loading, site maintenance and clean up) may take place outside these hours, during which time the gate shall be closed. **Section 3.6** of the Operations Plan and the sign plan has been so amended. At this time, WCA does not anticipate the need for operating hours to vary.

5. *Section 3.7; confirm that the operators at the facility are licensed.*

Operators of the facility shall be licensed and/or certified by NC DENR Division of Waste Management, SWANA, or other entities acceptable to the Division. **Section 3.7** of the Operations Plan has been so amended.

6. *Section 5.3; furnish the pending Appendix 4 for the application to be complete.*

A DRAFT Storm Water Pollution Prevention Plan (**Appendix 4**) is attached to this response document and will be made available for insertion into copies of the Operations Plan now in possession by the Division of Waste Management (refer to **Attachment 2** to this document).

7. *Appendix 2, Section 4.0, states that prohibited waste will be safely stored for later disposal. Some wastes may require special handling by licensed contractors. It should be stated that services of licensed contractors will be sought to dispose of prohibited materials. Provide a contingency plan for removal/clean-up of hazardous, liquid or other unacceptable waste.*

Please refer to the Hazardous Waste Contingency Plan (new **Appendix 3**) in the revision of the Operations Plan (**Attachment 3** to this document), which refers to a list of local hazardous waste responders taken from the Division's web site. The Hazardous Waste Contingency Plan provides protocols for staff action if hazardous wastes are detected at the facility.

8. *The plan mentions recycling activities. The plan does not state where materials may be placed on site, how to be protected from the elements, how long the collected recyclables would remain on site, what markets (should define markets and have letters of acceptance for the specific markets), or how much (volume/tonnages) of recyclables would remain on site before shipment.*

Recycling activities will be limited to metals and cardboard. These materials will be stored in covered roll-off boxes or trailers until a full load is gathered. These materials will be shipped to local markets that coincide with the established markets for WCA of High Point, LLC. This facility is an ongoing operation that has demonstrated abilities in moving its recyclables – documentation of current markets for recyclables, i.e., letters of intent, are provided in **Attachment 4** to this document.

*Also, show a layout on the drawing of designated area and/or trailers for different activities of sorting and stock piling at the facility.*

Please refer to the **Facility Plan, Drawing S2, Revision 4** (see **Attachment 5** to this document).

9. *Considering a highly regulated geographic area of Randleman Dam Watershed, the facility must comply with Storm Water and Erosion Control requirements and must have a Storm Water permit prior to issuance of the permit to construct and operate.*

The City of Greensboro has jurisdiction over matters pertaining to storm water management and has completed a thorough review of the site plan, including storm water management measures, pursuant to site plan approval by the City's Technical Review Committee. Future approvals by the City will include a sedimentation and erosion control plan, in conjunction with the building permit, along with an inspection of the completed storm water management measures by City officials. All City requirements regarding storm water management have been (and will be) met.

10. *Drawing S2: is the open tipping pad concrete or asphalt?*

The tipping pad will be paved with asphalt.

11. *Drawing S2: Note 2 reads maximum building size will be 7000 SF. Is there a building proposed at the facility? If so, please provide a location drawing of the building.*

The note on Drawing S2 pertains to the maximum allowable building size for the site, per the Special Use Permit provisions from the City of Greensboro – this is a local zoning requirement pertaining to any building that may be considered. At present, the only building planned for the site is the office/scale house (shown on Drawing S2), which will be a mobile office structure. The note on Drawing S2 has been amended for clarity.

12. On the Final Plat, Hilltop properties, LLC is listed as the owner. An affidavit from the owner will be required agreeing that the solid waste activities are conducted at his property and assumes the liabilities from those activities.

WCA and MRR anticipate that a pending real estate transfer will be completed by the time the facility becomes operational. While the ownership is still in the name of Hilltop Properties, WCA has a purchase agreement in place (**Attachment 6**) to be executed upon successful completion of a permit. An affidavit has been signed by the Owner of Hilltop Properties (**Attachment 7**), although all parties believe real estate transfer will be soon completed. Once the real estate transfer has been completed, a new plat will be prepared (for filing with Guilford County) and presented to the Division of Waste Management.

This concludes our response to the Division of Waste Management's comments. Please contact me if you have further questions.

Cordially yours,



G. David Garrett, P.G., P.E.  
Project Engineer

cc: Chris Roof, General Manager – MRR Southern  
Vernon Smith, Regional Vice President – WCA Waste Systems

- Attachments:
- 1 Letter from NCDOT Division 7 Engineer, J.M. Mills, P.E.
  - 2 DRAFT Storm Water Pollution Prevention Plan (**Appendix 4**)
  - 3 Revised Operations Plan (text)
  - 4 Documentation of Recycling Markets
  - 5 Facility Plan, Revision 4 drawing)
  - 6 Real Estate Purchase Agreement
  - 7 Affidavit executed by Hilltop Properties, LLC



**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 27, 2008

Mr. Vernon Smith, Regional Vice President  
WCA Waste Systems, Inc.  
421 Raleigh View Road  
Raleigh, NC 27610

Re: Comments to the Permit Application  
Burnt Poplar C&D Transfer Station  
Greensboro, Gilford County, North Carolina  
Permit No. 41-xxT (P1171)  
Doc ID No. 4258

Dear Mr. Smith:

The Solid Waste Section has reviewed the application and the drawings, December 2007 prepared for MRR Southern, LLC on behalf of Burnt Poplar Transfer, LLC and WCA Waste Systems, Inc. for the subject facility. We offer the following comments generated from our review.

1. Identify the service area from where the waste will be received. Please confirm that the service areas for the transfer facility and disposal facility are same.
2. Provide the traffic study or NCDOT waiver as required by Statute 130A- 295.5.
3. Provide the name and permit number for the disposal facility.
4. There is a discrepancy in the hours of operation in Section 3.6 and the facility sign shown on the cover sheet of the drawings. Please address a need for fluctuation of operating hours.
5. Section 3.7; confirm that the operators at the facility are licensed.
6. Section 5.3; furnish the pending Appendix 4 for the application to be complete.
7. Appendix 2, Section 4.0, states that prohibited waste will be safely stored for later disposal. Some wastes may require special handling by licensed contractors. It should be stated that services of licensed contractors will be sought to dispose of prohibited materials. Provide a contingency plan for removal/clean-up of hazardous, liquid or other unacceptable waste.
8. The plan mentions recycling activities. The plan does not state where materials may be placed on site, how to be protected from the elements, how long the collected recyclables would remain on site, what markets (should define markets and have letters of acceptance for the specific markets), or how much (volume/tonnages) of recyclables would remain on site before shipment.

Also, show a layout on the drawing of designated area and/or trailers for different activities of sorting and stock piling at the facility.

9. Considering a highly regulated geographic area of Randleman Dam Watershed, the facility must comply with Storm Water and Erosion Control requirements and must have a Storm Water permit prior to issuance of the permit to construct and operate.
10. Drawing S2: is the open tipping pad concrete or asphalt?
11. Drawing S2: Note 2 reads maximum building size will be 7000 SF. Is there a building proposed at the facility? If so, please provide a location drawing of the building.
12. On the Final Plat, Hilltop properties, LLC is listed as the owner. An affidavit from the owner will be required agreeing that the solid waste activities are conducted at his property and assumes the liabilities from those activities.

Thank you for your cooperation in this matter. Should you have any questions regarding this letter or wish to discuss the matter further, please contact me at (919) 508-8401.

Sincerely,

  
Digitally signed  
by Karim Fathan  
Date: 2008.03.28  
08:18:29 -04'00'

**Karim Fathan**  
Environmental Engineer  
Solid Waste Section

Cc: Ed Mussler, DWM  
Hugh Jemigan, DWM  
Jason Watkins, DWM  
David Garrett, PG, PE  
Chris Roof, MRR Southern  
Raleigh Central File – Guilford County (41-xxT) (P1171)

41-22T	2/25/09	DIN 5596
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**David Garrett & Associates**

**Engineering and Geology**



June 5, 2008

NC DENR Division of Waste Management  
Solid Waste Section, Permitting Branch  
1646 Mail Service Center  
Raleigh, NC 27699-1646

Attn: Mr. Karim Pathan  
Environmental Engineer

Re: Letter of Transmittal  
Final Permit Application  
Burnt Poplar Transfer, LLC  
C&D Transfer Station  
Greensboro, North Carolina



Dear Karim:

Please find attached an electronic submittal (in pdf format) for the referenced project. This submittal contains amendments resulting from our response to your review comments, which were provided in your letter dated March 27, 2008. Our responses were transmitted to you electronically, to which you responded via e-mail on May 8, 2008 that the resubmitted documents were satisfactory and we could submit the hard copy. Please note that substitute hard copy text and drawings have been placed in three (3) previously submitted binders – this was completed last week. Thus, I believe we have met your requirements for completing the application.

On behalf of MRR and WCA, I extend my sincerest appreciation for your comments and cordial handling of the review process.

Please contact me if you have questions or if I can be of further service.

Sincerely yours,

G. David Garrett, P.G., P.E.  
Project Consultant

cc: Vernon Smith, Regional Vice President, WCA Waste Systems, Inc.  
Chris Roof, General Manager, MRR Southern, LLC