



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

August 13, 2008

Mr. Vernon Smith
WCA Waste Corporation
40 Estes Plant Rd.
Piedmont, SC 29673

Re: Application for Burnt Poplar C&D Transfer Station
Guilford County, Doc ID 5528

Dear Mr. Smith:

The Solid Waste Section has completed review of the application for the above referenced proposed transfer station. Additional information is needed to complete the application:

1. Section 2 – The transfer station should not accept waste originating from commercial and industrial projects, unless it meets the definition of C&D waste in the .0532 rules, or if the landfill has been approved to accept industrial waste, in accordance with .0542(e)(4). The facility should not accept waste from non-C&D waste streams.
2. Section 2 – Typo – The text should not say that the site will receive asbestos waste.
3. Section 2 indicates that recyclables will include metals, cardboard, wood waste, soil, masonry, sheetrock, and/or beneficial fill. Section 3.3 indicates that only metals and cardboard will be recycled. Please clarify.
4. Section 3.8 – C&D waste shouldn't be stored at the site for up to 7 days. Storage should be no more than 24 hours, except 48 hours for a weekend, or 72 hours for a holiday weekend.
5. Section 3.8 – What is the end of each shift that the wastes and recyclables will be removed? All waste should be sorted and stored at the end of each operating day. Storage containers should be covered at the end of every operating day and during rain events.
6. Please provide a copy of the information provided to the Greensboro DOT for the expected traffic.
7. It is planned to issue the permit including Hilltop Properties, LLC as landowner, in addition to the other owner/operator entities. If the property is to be sold after permit issuance, the permit would have to be modified to include the new landowner on the permit (if different from the owner/operator) and the new deed information included in the permit. Also, revised pages indicating the new landowner, contact information, and deed information would be necessary to the approved operating plan. Alternatively, if the property is to be sold at the time of (just prior to) permit issuance, we could add the new landowner information to the permit before the permit is issued, and modify the operating plan, but we would not hold up the permit issuance for an indefinite time. The

permit has to be recorded at the register of deeds, with the correct landowner information, before the permit is valid.

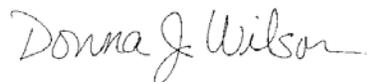
8. Provide a copy of the FEMA Flood Insurance floodplains map for the area, with the site property marked on the map.
9. Please clarify in the operations plan if demolition debris will be sorted and recycled. If it will, submit documentation of compliance with requirements of the Health Hazards Control Unit of the Division of Public Health, Department of Health & Human Services, regarding acceptance, storage, processing, and removal of asbestos or suspected asbestos containing material/waste. Contact Mr. Jeff Dellinger, at phone 919-707-5950, or jeff.dellinger@ncmail.net and provide copy of correspondence/approval.
10. Include the storage size of each recyclable. What is the maximum amount of each waste and recyclable material that will be stored onsite at any time? What is the combined volume of the maximum amount of wastes and recyclable material that will be stored on the property at any time? Describe the method for ensuring that 100% of the recyclable material will be processed and removed for the facility within one year of receipt.
11. Describe plan for handling waste loads that contain unacceptable waste, including MSW waste. Unacceptable waste must not be added to C&D waste that will be transported to a C&D landfill. Describe storage of the unacceptable waste and the frequency of removal of the waste (at least weekly).
12. Describe plan for operation of the facility in wet weather. If the facility is to operate during precipitation events, the tipping pad area must be sheltered from precipitation. It is preferred, but not required, that the tipping floor area be covered for all operations.
13. Section 3.8 - Wet or muddy waste should not be left out overnight. All waste should be placed in containers by the end of each day.
14. Describe recordkeeping of outgoing recyclables and waste (tonnages of each type of recyclable material sent to markets, tonnages of waste sent to a disposal facility, and any other disposition).
15. What is the status of the erosion control/grading permit and the stormwater permit? What is the status of the certification of evaluation of non-storm water discharges (App. 4B)?
16. Financial assurance documentation in accordance with N.C. G.S. 130A-294 (b2) is required for all permits. Please submit a cost estimate (to be added to the application) equal to the cost to hire a third party to remove, cleanup, haul and dispose of the maximum amount of materials (waste and recyclables) that the facility plans to store onsite (see comment 10 above) plus 5 days worth of transfer station incoming volume. This is required in the event of site abandonment or if the site is found to be in substantial non-compliance with state requirements. (Note: The facility be may be considered in substantial non-compliance if it is found storing more materials on site, (waste and recyclables) than the facility's operations plan and/or the facility's financial assurance mechanism covers.) The submittal of the financial assurance instrument will be a condition of the permit.
17. Please provide a drawing that shows the ground cover over the site (concrete, natural ground, asphalt, etc.), waste loading and unloading area, tipping floor and sorting area, storage areas indicating recyclable and waste type, and distances to wells, residences, wetlands, and water bodies. All sides of storage areas for flammable materials/waste should be clear and drivable, to provide vehicular access in the event of a fire.

Please submit response to comments as replacement pages to the application report. An electronic copy of the modified report should also be submitted, either sent by email, or on a CD. The modified pages should be marked with the revised date.

A compliance review is also required prior to issuance of the permit. A separate letter has been sent requesting an organizational chart and a compliance questionnaire.

If you have any questions or comments, or should you wish to discuss this further, please contact me at (919) 508-8510, or by email at donna.wilson@ncmail.net.

Sincerely,

A handwritten signature in cursive script that reads "Donna J. Wilson".

Donna J. Wilson
Environmental Engineer
Solid Waste Section

cc: David Garrett
Chris Roof
Karim Pathan