

Garrett & Moore, Inc.

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MEMORANDUM

TO: Goef Little
FROM: Vance Moore
RE: Modifications to CCT Process Permit Application
DATE: February 4, 2008



Please find attached five (5) copies each of the following:

- Section 1, Page 4 - Modified Section 1.13
- Section 3, Page 1 - Modified Section 3.4
- Appendix D - add Financial Assurance estimate.

APPROVED
DIVISION OF WASTE MANAGEMENT
SOLID WASTE SECTION
DATE 12-09-08 BY Goef Little
PTO # 4308 TP
Amendment 7

I trust these pages can be inserted to replace the original pages.

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1.8 Disposal of Waste Resulting from Operations - 15A NCAC 13B .1106(d)(9)

Residual waste incidental to the scrap tire collection and processing operation (e.g., trash, office and shop waste, etc.) are disposed of in the local municipal solid waste landfill. Waste oil is disposed of off-site by a private, licensed contractor

1.9 Description of Compliance with Rule .1106(c) - 15A NCAC 13B .1106(d)(10)

Refer to Section 2.0

1.10 Compliance with Local Zoning - 15A NCAC 13B .1106(d)(11)

The site, which is zoned as I (Industrial), is in compliance with all requirements of the Harnett County Zoning Ordinance.

1.11 Fire Protection - 15A NCAC 13B .1106(d)(12)

The Spout Springs Fire Department (Station 2) located at 20054 NC Highway 24/27 is less than 3 miles from the site and provides fire protection services at the site.

A letter from the Chief of the Spout Springs Fire Department accepting responsibility for fire protection services is included in Appendix C.

1.12 Operational Requirements Per Rule .1107 - 15A NCAC 13B .1106(d)(13)

Refer to Section 3.0

1.13 Financial Assurance - 15A NCAC 13B .1106(d)(14)

In accordance with 15A NCAC 13B .1111, Central Carolina Tire Disposal maintains financial responsibility in the form of a letter of credit to ensure closure of the site in accordance with NCDENR Solid Waste Management regulations and to cover property damage or bodily injury to third parties that may result from fire or other public health hazard occurring at the site. Central Carolina Tire Disposal has prepared a Financial Assurance estimate for \$705,000 which is included on Appendix D. A Letter of Credit in the amount of \$705,000.00 will be obtained by Central Carolina Tire Disposal and provided to NCDENR Solid Waste Management within four months of issuance of the Solid Permit associated with this application.

3.0 COMPLIANCE WITH OPERATIONAL REQUIREMENTS FOR PROCESSING SITE per 15A NCAC 13B .1107

3.1 Indoor Storage of Scrap Tire - 15A NCAC 13B .1107(1)

The Central Carolina Tire Disposal facility does not store scrap tires indoors, other than temporary storage in enclosed trailers.

3.2 Outdoor Storage of Scrap Tire - 15A NCAC 13B .1107(2)(a)

Whole scrap tires shall be placed in an outdoor scrap tire pile(s) having dimensions no greater than 200 feet in length, 50 feet in width and 15 feet in height.

3.3 Fire Lane - 15A NCAC 13B .1107(2)(b)

A 50-foot wide fire lane is maintained around the perimeter of each processed scrap tire pile.

In addition, processed tires are either loaded directly into dump trucks for transport and disposal in the on-site tire monofill or routed to the secondary shredders where they are reduced to rubber chips. Therefore, above ground piles of processed tires over 1,000 cubic yards in size are not anticipated.

3.4 Vector Control - 15A NCAC 13B .1107(2)(c)

Whole scrap tires received at the site are stored in enclosed trailers. Whole scrap tires at the processing area are typically processed the day unloaded from the trailer. In addition, Central Carolina Tire Disposal has attempted numerous methods to control mosquitoes, including foggers and electronic devices. Because of the location of the scrap tire collection and processing operation relative to the property lines, mosquitoes are not a public health issue at the property boundaries.

3.5 Signs - 15A NCAC 13B .1107(2)(d)

A sign is posted at the entrance of the site stating the hours of operation (8:00 am to 5:00 pm Monday through Friday). A gate at the entrance is not opened unless an attendant or tire processing operations crew is present.

3.6 Fire Safety - 15A NCAC 13B .1107(2)(e),

Open flame, torches, or use of highly flammable materials are prohibited within 50 feet of all whole and processed scrap tire piles.

**Financial Assurance Estimate
For Removal, Hauling, and Disposal of Stockpiled Tires**

600,000 Total Tires
 100 Tires/Ton
 6,000 Tons of tires
 10 Tons Tires per Truck
 600 Truck Loads
 8 Truckloads/Day
 75 Days Hauling

Tire Loading (Backhoe and Operator)	\$ 75.00 /HR	8.00 Hr/Day	\$ 600.00 /Day	75 Days	\$ 45,000
Hauling (Truck and Driver)	\$ 75.00 /HR	8.00 Hr/Trip	\$ 600.00 /Trip	600 Trips	\$ 360,000
Tip Fees			\$ 50.00 /Ton	6,000 /Ton	\$ 300,000
Total					\$ 705,000