

Wilson, Donna

From: David Garrett, P.G., P.E. [davidgarrettpgpe@mindspring.com]
Sent: Tuesday, November 30, 2010 3:57 PM
To: Wilson, Donna
Cc: Nick Marotta
Subject: WCA Brownfield Response
Attachments: WCA response to donna wilson comments 11-18-2010.pdf; 20101118162648971.pdf

Donna, did I already send you these, in response to your most recent comments? If not, here is WCA's amended annual reports and response concerning the standby trust. Thank you. David
919-418-4375

David Garrett, PG, PE
Engineering and Geology
5105 Harbour Towne Drive
Raleigh, NC 27604
Tel. 919-418-4375 Direct

David Garrett

From: Nick Marotta <nmarotta@wcamerica.com>
Sent: Thursday, November 18, 2010 4:27 PM
To: david@davidgarrettpe.com
Cc: Dennis Gehle; Vernon Smith
Subject: Response to Donna Wilson

David

In regard to the last 2 question from Donna, I have drafted the following response

1. The capacity and volume numbers from the July 2008 and July 2009 facility annual reports provide conflicting and confusing information (compared to the PTC application). Please provide clarification for these numbers, consistent with the capacity and volume numbers prepared for this report.

a. In the July 2008 report, it was reported that the amount of waste disposed according to scale records since the opening date through the date of survey (Feb. 2008) was 623,788 tons. In the July 2009 report, it was reported that the amount of waste disposed according to scale records since the opening date through the date of survey (Feb. 2009) was 1,093,504 tons. The difference is nearly 400,000 tons but the amount of waste received annually is less than 200,000 tons.

RESPONSE: WCA personnel researched these tonnages and volumes from 2008 to 2010 and found that the reported number is 2008 was correct. The 2009 report was revised a total disposal of 1,104, 223 cubic yards and a tonnage of 784,427 tons.

b. In the July 2008 report, since opening of the landfill how much volume has been used as determined by aerial or survey was reported to be 887,445 cy. In the July 2009 report, since opening of the landfill how much volume has been used as determined by aerial or survey was reported to be 1,822,500 cy. The total gross capacity of Phase 1 is 1,632,050 cy.

RESPONSE: The total capacity of the constructed landfill is verified at 1,632,050 cubic yards, the amount of disposal for the 2009 report is 1,104,223 cubic yards.

c. It is noted that the 2010 annual report has been amended for the total airspace used as 1,944,448 cy. However, the total capacity of Phase 1 is 1,632,050 cy.

RESPONSE: The 2010 annual report has been revised to 1,227,708 cubic yards. The to date cubic yardage consumption and tonnages have been checked and back checked to each of the respective surveys and volume computations performed by third party consultants.

2. As noted in previous comments, the compliance review portion of the application is not complete.

a. A stand-by trust fund is required for the existing WCA financial assurance mechanisms (all WCA facilities). One stand-by trust fund may be used for all WCA facilities. Contact Donald Herndon to address this matter.

RESPONSE: WCA has verified this requirement and will establish the required standby trust fund as required by NC DENR code.

b. For WCA of High Point C&D Landfill, the financial assurance instrument is not up-to-date. The financial assurance amount, as approved February 2009 in the Permit to Construct Phase 2 application (Doc ID 6646), must be increased to \$4,097,495. This should have been submitted prior to the operation of Phase 2A (see Doc ID 6862).

RESPONSE: WCA has verified this requirement and will establish the financial assurance for High Point in the required amount.

David please take a look at this response and call me to discuss

Dennis can you scan the DENR 2009 and 2010 reports and email to David G

thanks,
Nick

NICK MAROTTA
WCA WASTE CORPORATION
Regional Engineer
954 415-7230



State of North Carolina
 Department of Environment and Natural Resources
 Division of Waste Management
CONSTRUCTION AND DEMOLITION LANDFILL
Facility Annual Report
 For the period of JULY 1, 2008-JUNE 30, 2009

If you have questions or require assistance in completing this report, contact your Regional Environmental Senior Specialist. According to (G.S. 130A-309.09D(b)) completed forms must be returned by August 1, 2009 and a copy of this report must be sent to the County Manager of each county from which waste was received.

Facility Name: Material Recovery/Brownfield Rd C&D Landfill Permit: 9231-CDLF ID: P1061

Facility Website (URL): _____

Physical Address		Mailing Address	
Street 1: <u>2600 Brownfield Road</u>		Street 1: <u>421 Raleigh View Road</u>	
Street 2: _____		Street 2: _____	
City: <u>Raleigh</u>		City: <u>Raleigh</u>	
State: <u>North Carolina</u> Zip: <u>27610</u>		State: <u>North Carolina</u> Zip: <u>27610</u>	
Facility Contact - Primary		Facility Contact - Secondary	
Name: <u>Dennis Gehle</u>		Name: <u>Richard Call Jr.</u>	
Phone: <u>(919) 866-1211</u> Fax: <u>(919) 866-0067</u>		Phone: <u>(919) 779-3339</u> Fax: <u>(919) 779-3970</u>	
Email: <u>dgehle@wcamerica.com</u>		Email: <u>rcall@wcamerica.com</u>	

- Tipping Fee: \$34.00 per Ton (Attach a schedule of tipping fees if appropriate.)
- Does the tip fee above include the \$2.00 Solid Waste Tax? Yes No
- What was the opening date of the facility? Oct 1, 2003
- What was the date of the last survey used to determine the volume used at the landfill? 2-13-09
- How much waste has been disposed, according to scale records, since the opening date through the date of the survey? 784,427 tons
- Since the opening of the landfill, how much volume has been used at the landfill as determined by aerial or ground survey? 1,104,223 cubic yards
- How much volume remains at the landfill as determined by aerial or ground survey?
527,827 Constructed (cubic yards) 7,233,301 Overall (cubic yards)
- Indicate type and tonnage of material separated from received waste (recycling/recovery) which did not go into the landfill.

Material	Tons	Material	Tons	Material	Tons
Paper		Wood		Computer Equipment	
Cardboard		Glass		Televisions	
Aluminum Cans		PETE (#1) Plastic		Concrete/rubble/asphalt	19,194.09
Steel Cans		HDPE (#2) Plastic		Contaminated Soils (for ADC)	
Other Metal		Other Plastic		Other Clean soils for ADC	996.05
Other _____		Other _____		Other _____	
Total					20,194.14

9. Indicate the quantity of unprocessed material stockpiled on-site as of June 30, 2009 (tons) 19,194.09

State of North Carolina

Department of Environment and Natural Resources
Division of Waste Management

CONSTRUCTION AND DEMOLITION LANDFILL

Facility Annual Report

For the period of **JULY 1, 2009-JUNE 30, 2010**



If you have questions or require assistance in completing this report, contact your Regional Environmental Senior Specialist. According to (G.S. 130A-309.09D(b)) completed forms must be returned by August 1, 2010 and a copy of this report must be sent to the County Manager of each county from which waste was received.

Facility Name: WCA / Material Recovery/Brownfield C&D Landfill

Permit: 9231-CDLF-

ID: P1061

Facility Website (URL): _____

Physical Address		Mailing Address	
Street 1: <u>2600 Brownfield Road</u>		Street 1: <u>421 Raleigh View Road</u>	
Street 2: _____		Street 2: _____	
City: <u>Raleigh</u>	County: <u>Wake</u>	City: <u>Raleigh</u>	
State: <u>North Carolina</u>	Zip: <u>27610</u>	State: <u>North Carolina</u>	Zip: <u>27610</u>

Primary Facility Contact Person		Billing Contact Person	
Name: <u>Dennis Gehle</u>		Name: <u>Same</u>	
Phone: <u>(919) 866-1211</u>	Fax: <u>(919) 866-0067</u>	Phone: _____	Fax: _____
Email: <u>dgehle@wcamerica.com</u>		Email: _____	

1. Tipping Fee: \$34.00 per Ton (Attach a schedule of tipping fees if appropriate.)

2. Does the tip fee above include the \$2.00 Solid Waste Tax? Yes No

Airspace (Capacity): Questions in this section relate to all cells/units of the C&D facility operated under the current 4-digit permit number regardless of whether the cells/units are closed or are not contiguous at the time of this report. Tonnage questions must be based on scale records and cover the period between the opening date and the date of the last survey unless another time period is approved. Airspace measurements include weekly, intermediate and final cover.

3. Date Facility Last Surveyed: 2/11/2010

4. Date Facility Opened: 10/01/2003

5a. Airspace Constructed (cubic yards)

4,632,050

5b. Future Airspace not yet constructed (cubic yards)

5,705,474

6. Airspace Used (cubic yards)

1,227,708

7. Total Tons Disposed in Airspace Used (tons)

893,361

8. If the facility recycles or recovers from the incoming waste stream, indicate type and tonnage of material which did not go into the landfill.

Material	Tons	Material	Tons	Material	Tons
Paper		Wood		Computer Equipment	
Cardboard		Glass		Televisions	
Aluminum Cans		PETE (#1) Plastic		Concrete/rubble/asphalt	9,429.56
Steel Cans		HDPE (#2) Plastic		Gypsum/drywall	
Other Metal		Other Plastic		Other Fill Dirt	11,269.54
Other		Other		Other	
Total					20,699.1

9. Indicate the quantity of unprocessed material from recycling or recovery operations stockpiled on-site as of June 30, 2010 (tons) 9,000