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Backus	03/17/2011	13312	01-05



North Carolina Department of Environment and Natural Resources
Division of Waste Management

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

March 17, 2011

Brenda and Kent Coble
Coble's Sandrock, Inc.
5833 Foster Store Road
Liberty, NC 27298

Re: Application Review – Asphalt Shingle Recycling
Cobles Construction and Demolition Debris Landfill
Alamance County, Permit No. 01-05, Document ID No. 13312

Dear Mr. and Ms. Coble:

The Division of Waste Management, Solid Waste Section (Section) received your request for a permit modification for the Cobles Construction and Demolition Debris Landfill, Permit No. 01-05, on February 21, 2011, DIN 13014.

I have completed a review of the application and have the following questions/comments. Please provide a response for each item and/or revise the application as necessary.

1. Please include a statement at the beginning of item 2.0 to indicate that only tear-off scrap shingles from residential buildings having four or fewer dwelling units will be sorting for recycling as stated in the supply certification form. These building are not "regulated facilities" under NESHAP. This is a requirement in the Department of Health and Human Service, Health Hazards Control Unit (HHCU) approved plan that a shingle grinder must obtain.
2. The application is being reviewed based on what is current practice for the hot mix asphalt market. There may be different requirements for other markets. Contact the Section before supplying shingles for other markets.
3. Please remove "approximately" from item 2.2.d. as it is subjective and could be misinterpreted.
4. Please provide a drawing for the shingles area. Indicate the areas for unload, sorting, and storage. Also indicate how the areas will be designated. For example, some facilities are using signs to designate locations and "Jersey" barriers to allow flexibility on separating piles. Please also insure that it is not encroaching on the LCID limits. I cannot determine that from the drawing submitted.
5. Item 2.1.a. indicates that mixed loads containing demolition/construction debris will be disposed in the C&D landfill without recycling the shingles, yet in item 2.2.f. , it is stated that the "mixed load will be sorted". Please clarify. Sorting of demolition debris would require meeting the requirements of a solid waste processing facility and an approved plan from the HHCU.

6. The plan does not include details on the sorting process. When will it occur (as the loads are received, daily, etc.)? Will an employee be at the area when shingles are unloaded? Will a container or dumpster be at the area to collect unacceptable material when sorting or will this be done differently? Please address this in the plan.
7. All shingles have to be sorted, even what is described as pre-sorted shingle loads. Experience has shown that even though the suppliers are instructed, unacceptable material can be present. As noted in comment 5, the plan does not indicate oversight when materials are unloaded which might allow immediate detection. Please change item 2.2.e.
8. Item 2.2 g. indicates that sorted scrap shingles will be collected and stored in a pile for up to 90 days. The plan does not indicate an estimated daily volume nor will that piles be based on a date. I do not understand how the 90-day limit will be managed. Also, the plan does not indicate what will be done after 90 days. Also, what will be done if there is not enough room to store that amount in the designated area?
9. The Section is working with other departments and with paving industry representatives to better coordinate our efforts. I anticipate that the requirement to obtain the letter of HCCU approval from your customers will be eliminated. I will notify you if this occurs. However, your customers may require something from you indicating that shingles were from a residential "non-regulated" facility under NESHAPS as noted in comment 1.

If you have any questions or need to discuss, please contact me at (919) 508-8520 or by email at pat.backus@ncdenr.gov.

Sincerely,



Patricia Backus, P.E.
Permitting Engineer
Solid Waste Section

cc: Hannu Kemppinen, P.G., Joyce Engineering, Inc.
Ed Mussler, P.E., Permitting Branch Head
Geof Little, Permitting Engineer
Jason Watkins, Eastern District Supervisor
Chris Marriott, Environmental Senior Specialist