



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

Dexter R. Matthews	Beverly Eaves Perdue	Dee Freeman
Director	Governor	Secretary

March 23, 2011

Mr. Buddy Norris
Avery County – Solid Waste Director
PO Box 640
Newland, North Carolina 28657

Subject: Request for Additional Information
Avery County Transfer Facility
Avery County, Permit #06-02, Document ID No. 13369

Mr. Norris:

The Division of Waste Management, Solid Waste Section (Section) has completed the review of the document titled *Permit Renewal Application* (DIN 12816) submitted in request of a five-year renewal of the Permit to Operate. The document was submitted on your behalf by Richardson, Smith, Gardner and Associates and was received in the Asheville Regional Office on January 31, 2011.

The submittal has been reviewed for completeness in accordance with General Statute 130A-295.8(e). A determination of completeness means that the application includes all required components but does not mean the required components provide all of the information that is required for the Section to make a decision on the application. The permitting activity fee, in addition to the components required by 15A NCAC 13B.0401, has been submitted so the application is deemed complete.

Based on this review, it has been determined the Section requires clarification or additional information in order to approve the Operations Manual. Please provide a response for each of the followings items and revise the Operations Manual as necessary:

1. The Operations Manual has been revised to include activities for Permit number 06-03, Construction and Demolition Landfill, and 06-02T, Transfer Facility. As a result, this one document will be added to the List of Documents for the Approved Plan in two separate Permits to Operate. Therefore, any change to this one document will result in permitting activity fees being invoiced for both Permit numbers.
2. Section 1.6, Facility Operating Hours, states the facility has “daily operating hours of 6:00 A.M. to 8:00 P.M. Monday to Saturday” and “Waste disposal activities will be conducted between 8:00 A.M. to 4:00 P.M. Monday to Friday and 9:00 A.M. to 1:00 P.M. on Saturday”. Please clarify the difference between the two different hours of operation. Also, it should be noted, the sign currently outside the facility states the operating hours are from 8:00 A.M. to **4:30** P.M. Monday to Friday.
3. Section 1.6, Facility Operating Hours, states the “supervisor will request approval from the commission’s regional office”. By “commission” do you mean Division of Waste Management?

4. Section 1.11, Personnel Requirements, states “Future requirements to be certified as a Manager of Transfer Station Systems or Transfer Station Operations Specialist are on the horizon and if this certification becomes a requirement, supervisory staff shall comply”. A standard Permit condition requires that a “responsible individual trained and certified in facility operations must be on-site at all times during all operating hours of the facility”. The training and certification process necessary to meet this Permit condition must be approved by the Division.
5. Section 2.6.4.1, Asbestos Management, states the “hauler will be directed to the designated asbestos disposal area by operations personnel”. In accordance with 15A NCAC 13B.0542(c)(2), the designated area must be shown on Operation drawings.
6. Section 2.6.4.1, Asbestos Management, states “Once disposal and recording for asbestos waste is completed, the disposal area may be covered with waste”. In accordance with 15A NCAC 13B.0542(c)(2), the asbestos waste must be disposed of separate and apart from other solid wastes.
7. Section 2.9.3.4, Leachate Management, makes no mention of leachate that may leak from full transfer trailers stored on site. This has become an issue at other Transfer Facilities and should be addressed if trailers are stored outside of a containment system.
8. Section 3.4, Landfill Gas Management, does not state a monitoring frequency. In accordance with 15A NCAC 13B.0544(d)(2)(B), monitoring must be conducted quarterly or as approved by the Division.
9. Section 2.0, Mobile Home Deconstruction Process, of Appendix B states the “delivered mobile home will not be weighed on the scales at time of delivery”. Section 2.5, Deconstruction of Mobile Homes, states “material not planned for recycling will be placed in the C&D landfill”. It is unclear whether the waste will be weighed prior to placement in the C&D landfill.
10. There is no discussion in Appendix B on the management of thermostats (mercury switches) that may be found within the mobile homes brought to the site for deconstruction. Thermostats with mercury switches are considered Universal Waste – Mercury Containing Equipment and must be properly managed.
11. Section 3.0, Record Keeping Program, of Appendix B states “see also Section 1.11 of the Operations Manual”. Section 1.11 of the Operations Manual is labeled Personnel Requirements.

If you should have any questions regarding this matter please contact me at (828) 296-4703, or by email at allen.gaither@ncdenr.gov .

Sincerely,



Allen Gaither
Environmental Engineer

Cc: Ms. Jeryl Covington – RSGA
Mr. Stacey Smith – RSGA
Mr. Bill Wagner – SWS/ARO