

Scanned By	Date	DOC ID	Permit
Backus	4/10/2012	16422	0703T-TRANSFER



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

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

April 10, 2012

Mr. Ray Hoffman
Republic Services of North Carolina, LLC
1220 Commerce Street SW, Box 1
Conover, NC 28613

Subject: Applications for Permit Amendment and Change of Ownership
Beaufort County Transfer Station
Permit 07-03T, Beaufort County, Document Id No. 16422

Dear Mr. Hoffman,

I have reviewed the application for continued operation (permit amendment) submitted by Waste Industries (DIN 15918) in December for the Beaufort County Transfer Station and the application for a change in ownership of the facility recently submitted by Civil and Environmental Services, Inc. on behalf of Republic Services of North Carolina, LLC (Republic).

I have only a few minor comments concerning the operation plan submitted by Waste Industries, however, the permitting for the change in ownership would be more straightforward if you would revise the operation plan to reflect the operation as a Republic-owned facility. As part of my review, I also compared parts of the operation plan to the comments and observations in the Facility Compliance Inspection Report issued after the February 2, 2012, site inspection (DIN 16036). Some questions relate to the comparison.

Please address the following comments and questions concerning the operation plan.

1. Provide an estimate of the amount of waste received per day. The Facility Compliance Inspection Report stated that the facility receives approximately 130 tons per day.
2. Our phone numbers recently changed. Please update the numbers listed in sections II.A and II.D to (919) 707-8200.
3. The Solid Waste Section (Section) has a Fire Occurrence Report that is available on our portal site, <http://portal.ncdenr.org/web/wm/sw/forms>. Please include a copy of the form in the operation plan.
4. The hours of operation listed in section IV are different from the hours of operation shown on the Facility Compliance Inspection Report. The report listed the hours of operation as 7:00 AM to 3:45 PM Monday through Friday and 7:00 AM to 12:30 PM on

Saturday, while the operation plan states 6:00 AM to 8:00 PM Monday through Saturday. Please check and insure the operation plan has the correct information.

5. The operation plan should address random sampling including the frequency and procedure. Include any forms that you will use to document this.
6. Please indicate what is included in the "normal bookkeeping". I would expect to see the county of origin for waste accepted and the destination for waste disposal, if more than one facility.
7. I believe the site also collects tires, white goods, and metals for recycling. Please state this in the operation plan and briefly indicate requirements for these materials, such as removal of Freon, limit of tires onsite, etc.
8. Please include a site plan drawing or aerial photo with areas of operation indicated.
9. The application should also include an estimate of financial assurance. Typically this is estimated as the third-party cost for removal and disposal of five days of waste received and of the maximum amount of accumulated materials onsite.

For the transfer of permit, I will need several things in addition to the revised operation plan. These include a copy of the recorded deed showing ownership of the property, a completed compliance history review, payment of the appropriate permitting fee, and the establishment of financial assurance. I have requested that staff initiate the compliance history review and issue an invoice for the permitting fee of \$3,000.

If you have any questions or can be of further assistance, please contact me a (919) 707-8257 or by email at pat.backus@ncdenr.gov.

Sincerely,



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

cc: Ed Mussler, P.E., Permitting Branch Head
Dennis Shackelford, Eastern District Supervisor
Ray Williams, Environmental Senior Specialist