



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

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

SOLID WASTE SECTION
May 11, 2011

Ms. LaDonna Bolton, Division Manager
Republic Services of North Carolina
Post Office Box 1097
Conover, North Carolina 28613

Subject: Permit to Operate, Amendment, Five (5) Year Renewal
Completeness Determination and Technical Review
GDS Conover Transfer, Recycle, Resource Recovery and Processing Facility – Permit No. 1805
Catawba County, DIN 13859

Dear Ms. Bolton:

On April 11, 2011 the Division of Waste Management (Division), Solid Waste Section (Section) received your application for a Permit to Operate Amendment, five (5) year renewal, for the GDS Conover Transfer, Recycle, Resource Recovery and Processing Facility, Permit No. 1805, located in Catawba County. The application was entitled;

Operation Plan for GDS Conover Transfer Station, Conover, North Carolina, August 2011. Prepared by Republic Services. April 2011. DIN 13585.

The Section has performed a review of your application for a determination of completeness and determined the application is complete in accordance North Carolina General Statute NCGS 130A-295.8(e). A determination of completeness means the application contains the required components in accordance with North Carolina Administrative Code 15A NCAC 13B .0400. In addition to the determination of completeness the Division has completed the technical review of the application and requests that you respond to the following items in order to expedite the application;

- Section – 2.0 Waste Acceptance Criteria is inconsistent with Section – 3.0 Transfer Station Operations, the City of Newton is not referenced in Section – 2.0.
- Section - 2.1 Recyclable Material states; *Portions of dry recyclable material such as metals and cardboard may be separated for recycling at the transfer facility, however, no recyclables will be separated from putrescible garbage.* Add to the previous statement that, no recyclables will be separated once contaminated by leachate from the tipping floor.
- Section – 2.2 Prohibited Wastes gives an incorrect Regional Office address, the correct address is;
North Carolina Department of Environment and Natural Resources
Solid Waste Section
610 East Center Street, Suite 301
Mooresville, North Carolina 28625
- Section – 3.0 Transfer Station Operations
 - Clarify the operation hours of the transfer station, 6:am to 5:pm or midnight to 6:pm.



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- States; *NCDENR will be notified if final disposal sites change in the future.* Be aware that, proposed changes to the service area and/or the disposal facility must be approved by the Section and will constitute a permit modification and be subject to the applicable permitting fee.
- Section – 7.4 Notification of Fire gives an incorrect Regional Office address, the correct address is;
North Carolina Department of Environment and Natural Resources
Solid Waste Section
610 East Center Street, Suite 301
Mooresville, North Carolina 28625
- Include a description of the MRF operations, including; the process for accepting, sorting/processing, and storing of each type of recyclable.
- Submit a site diagram which includes, at a minimum; structures and leachate containment system inlets and storage tanks.
- In order to establish Financial Assurance, the Facility should submit cost estimates equal to the cost to hire a third party to remove, cleanup, haul and dispose of a minimum of five days volume of incoming waste, plus the maximum amount of materials (waste and recyclables) that the facility plans to store onsite. The establishment of Financial Assurance is required, in accordance with NCGS 130A-294 (b2), in the event of site abandonment or should the site is found to be in substantial non-compliance with Division requirements. Do not begin the process of establishing a Financial Assurance Mechanism until your cost estimates have been approved by the Section.

Note: The Division requires specific language for financial assurance mechanisms. Visit the Section's website at <http://portal.ncdenr.org/web/wm/sw/financialassurance> for financial assurance mechanism templates.

Should you have any questions regarding this matter you may contact me at (828) 296-4704 or at larry.frost@ncdenr.gov.

Sincerely,



Larry Frost
Environmental Engineer

cc: Charles Gerstell – SWS/MRO