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

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Director

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SOLID WASTE SECTION

September 8, 2010

Mr. Wilce B. Martin, Public Works and Utilities Director
City of Newton
Post Office Box 550
Newton, North Carolina 28658

Subject: Permit Modification – Request to Revisions to Operations Plan
City of Newton Land Clearing and Inert Debris Landfill (LCID), Permit No. 1811
Catawba County, DIN 11537

Dear Mr. Martin:

On August 6, 2010 I received Operations Plans for the City of Newton LCID Landfill and the proposed Composting Unit at the Landfill, entitled:

City of Newton Operation Plan for LCID Landfill and *City of Newton Operational Plan for LCID Landfill Composting Facility*. Prepared by the City of Newton. August 6, 2010. DIN 11481.

I have reviewed the information presented in the Plans and have the following comments:

1. The Composting Unit may occupy an area no greater than two (2) acres. The Divisions recommends that the City mark the two (2) acre area.
2. Your Composting Unit Operational Plan states a capacity as *Estimated tonnage* at 300 - 350 tons annually, this capacity should be changed to read: "The composting unit will process or store less than 6,000 cubic yards of material per quarter.
3. Your Composting Unit Operational Plan refers to the use of a trench burner; remove this language from the Plan. The Division cannot permit the burning of waste.
4. Add to your Composting Unit Operational Plan a requirement to maintain a composting log book. The log should document incoming loads of materials by volume, composting dates and temperatures, grinding operations, and outgoing loads of compost.

Notes:

- The LCID Landfill remains to be constructed and no landfill activity may take place until the construction is completed.
- Remember leaves and grass clippings must be composted prior to being distributed. A City owned composting facility is not required to compost the material; the material may be composted at any

properly permitted facility. Contact Mr. Charles Gerstell (704) 235-2144 or charles.gerstell@ncdenr.gov, for a complete list of permitted composting facilities in your area.

- North Carolina General Statute 130A-22 provides for administrative penalties of up to fifteen thousand dollars ($15,000.00) per day per each violation of the Solid Waste Management Rules.

Please revise your Operational Plans and send me a copy for review, at your earliest convenience. If you should have any questions regarding this matter you may contact me at (828) 296-4704 or larry.frost@ncdenr.gov.

Sincerely,

Larry Frost
Environmental Engineer

cc: Charles Gerstell – SWS/MRO