

## Little, Geof

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**From:** Little, Geof  
**Sent:** Tuesday, June 22, 2010 4:43 PM  
**To:** mtucker@metroenergync.com  
**Cc:** Moore, Pamela; Hearn, Robert; Poindexter, Mark; Mussler, Ed; Crissman, Paul  
**Subject:** Comments from Today's Site Visit

Today, Pam Moore, Robert Hearn and myself met with you at your proposed waste tire treatment and processing facility. During the site visit, you failed to demonstrate to our group that the facility was constructed in accordance with the approved plans, permit and NC Solid Waste Rules. Below is a summary of observations we made during our visit.

1. You and I discussed that during the application process, you stated (and showed your purchase offer) that the purchase of the property was contingent on obtaining a permit. The Chatham County Register of Deeds shows you purchased the property 04/09/2010 and the Permit to Construct was issued 04/26/2010. We discussed the lack of communication sets an adverse precedent at this stage of the process.
2. The facility was not constructed in accordance with the approved Operations Plan, the permit or the Solid Waste Rules. No processing equipment and 2 storage containers (approximately 30 cubic yard capacity) were on site today. Also noted was the lack of fencing, gates and signs. The soil and rocks that were loosely placed approximately 1 foot high around the 2 storage containers were not adequate for retaining liquids or flowing rubber.
3. Significant amounts of solid waste was pushed into and covered by soil during site preparation. The waste material was consistent with the types of waste that would be generated by the deconstruction of buildings you said occurred on-site and included vinyl siding, lumber, metal, wiring and various other construction and household items.
4. You stated that you do not wish to construct the facility that you submitted in application for a Permit to Construct at this time. You stated that you do not wish to 'process' tires now, but wish to use tire walls as a building material, which was not listed in the approved plan as an end use of the material. As you and I discussed, should you so choose, you may submit an application to modify the permit along with a modification fee of \$500.
5. Should you wish to pursue a Permit to Operate for the facility for which you submitted an application, you will need to comply with all the conditions contained in the permit and the Solid Waste Rules, and the facility must be in accordance with the approved Operations Plan.
6. Please note that the solid waste that was pushed and covered during site preparation will need to be properly addressed regardless of whether you apply for a Permit to Operate.
7. You were cautioned to carefully review and understand the permit and the Solid Waste Rules. You did not demonstrate a clear understanding of the requirements for obtaining a Permit to Operate today.

These comments summarize my observations only. Robert and Pam may have other concerns.

Please contact me with any question or comment regarding the above information.

**Geof**

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**Geoffrey H. Little**

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