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NCDENR

NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES

Dexter R. Matthews, Director
Division of Waste Management
Michael F. Easley, Governor
William G. Ross Jr., Secretary

June 1, 2006

William M. Hester
General Manager
River City Recycling Transfer Station
1049 S Eastern Boulevard
Fayetteville, NC 28306

Re: Application Review Comments
River City Recycling Transfer Station
Cumberland County, North Carolina
Permit No. Application
Doc ID No. RCO233

Dear Mr. Hester:

Thank you for meeting with Dennis Shackelford and me Wednesday, May 31, 2006, at the site to discuss the proposed facility. As discussed, a review of the above referenced application, the first submittal received July 6, 2005 and the second submittal dated March 20, 2006, is completed. Below are comments that are requested to be addressed before additional consideration of the permit application. The response should be a single complete and revised document. When a consensus is reached on the document, then 2 additional copies should be submitted at that time.

1. Please provide legal description of the property, and proof of ownership such as a deed of trust or other legal right-of-access to the property.

2. Detailed plans and specifications are required under NC Solid Waste Management Rule .0202(a)(3) to be prepared by a professional engineer. Consistent with that rule, the drawings labeled Appendix C-1 General Site Plan, C-2 Layout Plan, C-3 Facility Boundary Plan, Appendix C-4 Grading Plan, Appendix D-1 Transfer Station Bldg. Side Elevation, Appendix D-2 Transfer Station Bldg. Front Elevation, Appendix D-3, Appendix D-4, Appendix D-5, and Appendix D-6 Roof Framing Plan must be signed and sealed by a professional engineer licensed to practice in North Carolina.

3. The drawings must delineate the boundary of the proposed facility including access roads and buildings within the property.

4. Chapter 1.0 Introduction (p. 3, paragraph 1): Please modify the statement that begins "It is the company's intent to provide a disposal site ...." The phrase 'disposal site' should be modified to read 'transfer facility.'

5. Chapter 3.0 Transfer Station Operations: Please provide a Waste Screening and Employee Training Program for identifying prohibited wastes and for documenting performance of waste screening.

6. Chapter 3.0 Transfer Station Operations: Please provide a contingency plan for managing prohibited wastes that may be received at the site.

7. Chapter 3.0 Transfer Station Operations: Please provide clarification regarding material storage at the site. Operating hours are proposed say something about the 24-hour storage time listed in letter needs to be in Op/Plan & revised to account for weekend/holiday/inclement weather conditions.

8. Chapter 3.0 Transfer Station Operations: Please discuss inclement weather operations.

9. Chapter 4.0 Erosion Control (p.9): As stated in the Guidance for the Preparation of Permit Applications for Transfer Facilities, please provide documentation for the approved Erosion and Sediment Control plan for the Transfer Facility from the NC Land Quality Section.

10. March 20, 2006, Letter: The service area for the Cumberland County Landfill is only Cumberland County including Fort Bragg. Material received at the proposed transfer station from outside of Cumberland County would not be eligible for disposal in the Cumberland County Landfill. The Operations Plan should be revised to address the permitted service areas of the landfills that will receive waste from the proposed Transfer Facility.

11. Please be aware that the Department may require the operator is financially qualified to carry out the activity for which the permit is required. As noted in a previous letter from Jim Coffey to you dated January 12, 2006, stockpiling material may be cause to require you to post financial assurance.

Should you have any questions regarding this letter or wish to discuss the matter further, please contact me at (919) 508-8504.

Sincerely,

Geoffrey H. Little
Environmental Engineer
Solid Waste Section

c: Paul Crissman, DWM
Ed Mussler, DWM
Dennis Shackelford, DWM