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Response to DRAFT PERMIT

River City Recycling

1049 S. Eastern Blvd., Fayetteville, NC 28306
(910) 486 4226 (o) ≈ (910) 485 7713 (f)

October 29, 2007

Geoffrey Little
Environmental Engineer
Solid Waste Section
NCDEHNR
1646 Mail Service Center
Raleigh NC 27699-1646

Re: Permit to Construct and Operate
River City Recycling Transfer Station
Cumberland County, North Carolina
Permit No. Application
DOC ID No. RCOXXX

Dear Mr. Little:

Per our recent conversation I considered the possibility of changing our application from a *transfer* to a *treatment and processing* facility. I believe in the interest of time and considering our planned operations as outlined in our application it would be in our best interest to leave the application as it stands – as a Transfer Facility. It is my understanding that at any point in the future should we need to make changes to the operation of our facility that are potentially outside of the permitted scope, it will be necessary to submit a request for a revision to our permit. Again, I think rather than trying to predict what the future may dictate, I will just go with our current plans as described.

With that said, in review of your comments in your 'DRAFT' permit, I offer the following in a hopeful conclusion to our permit request. I hope you find the comments or suggestion acceptable and move to finalize our permit request at your earliest convenience.

Financial Assurance

Attached is a Bank Letter of Credit in the amount of Fifteen Thousand Dollars ($15,000). A draft of this document has been reviewed and agreed by Amy Cagery, Compliance Officer at the Raleigh Central Office.

Also attached is a Quote / Letter from a local firm with knuckle boom type trucks for the removal of waste from our facility should an outside firm be necessary. Mr. Holder is a local waste hauler and receives a discounted rate at the Landfill of $30 per ton which leaves $30 per ton to cover the cost of his trucking. His trucks have a bulk capacity of 40 cy and a capacity of 14 tons.

I respectfully request that our financial assurance as presented cover 100 tons per day capacity. The calculation used to support our request - -

$ 15,000	/	$60.00	=	250	/	2.5	=	***100***
Financial Assurance		*Cost of Disposal*		*Total Loads*		*Max. Permitted Days on Tip Pad*		*Tons per Day*

Operation

Item 4. Please include Harnett County within our service area.

Item 5.c. & e. It is my understanding that the approved service area for Robeson County Landfill includes Cumberland County. If so we would like to include Robeson County as a final disposal option for debris generated in Cumberland County.

Waste Acceptance and Disposal

1. Approved Waste

It does not appear that "Demolition" waste is included in the accepted waste. Demolition waste is a planned accepted waste at our facility and is discussed in other areas of the draft permit. Please include Demolition Waste as an approved waste accepted at our facility [if it has been omitted from the draft?].

6. It is stated that 'No waste may be on-site for more than 48 hours.'

If this time frame includes weekends and /or holidays, then additional time will be needed to bridge the time frame of the weekend / holiday time frame.

Also included is a check for the Permit application fee for a C&D Transfer Facility in the amount of Five Thousand Dollars [$5,000].

Thank you for you time and assistance. Please let me know if you need anything else and if not we hopefully will put this thing to rest!

Respectfully,

William M Hester,
President

Attachments:

Certified Check ($5,000) [Permit Fee]
Bank Letter of Credit [Financial Assurance]
Quote for Material Removal and Disposal

Response To Letter of Concerns w/ Application

Cape Fear Site Works

James C Coffey
Regional Engineer
Solid Waste Section
NCDENR
1646 Mail Service Center
Raleigh NC 27699

March 20, 2006

RE: Response to Review of Permit Application for Proposed River City Transfer Facility, Fayetteville NC, Cumberland County

Sir,

I have received your letter dated January 12, 2006. I have again reviewed the "Guidance for the Preparation of a permit application for transfer facilities". Prior to this undertaking, I consulted with State Officials, visited other permitted facilities and reviewed previously submitted and approved applications and operational plans. As a professional previously registered with the State of North Carolina as a Landscape Architect, I am confident that our application and plan of operation meets or exceeds the State's requirements for operating a construction and demolition waste transfer facility.

In response to your concerns or questions:

General

Financial responsibility:

The facility will operate as a transfer facility. In accordance with State guidelines, no waste will be stored and all deposited waste will be removed from the facility within the required 48 hour work cycle. All waste will be transferred into larger roll-off bins or trailer to be transported to the ultimate disposal facility [see list provided below].

'stock-piled material': No waste will be stockpiled or stored at the facility beyond our planned 24 hour cycle time. As briefly mentioned in the application [see par. 4 pg. 4], materials banned by law from the landfill such as cardboard, pallets and aluminum cans will be pulled from the waste stream and removed from the facility within the 24 hour shift cycle. Other recyclables may be removed on a case by case basis, depending on the economics. Again all recycled material will be removed from the facility daily. In accordance with regulation, any material remaining at the facility will be containerized.

It is noted that the application is for a construction and demolition waste transfer facility, as opposed to a C&D processing facility. In reviewing my notes from several conversations with Mr.

Cape Fear SiteWorks, Inc
1049 S. Eastern Blvd., Fayetteville North Carolina 28306 ▌ 910 486 4226 (ofc) 910 485 7713 (fax)

Jim Barbour, NCDEHNR, he indicated that regulations do not prohibit the removal of recyclable material from the waste flow of a permitted facility. In contrast, laws require that some materials be removed prior to ultimate disposal. He also indicated that the recycled materials should be containerized or removed from the facility daily. He explained that the primary difference between transfer and processing facilities are the longer term storage of mixed waste and separated debris which to my understanding is permitted at a processing facility but not at a transfer facility.

Compliance Review:

No known violations exist.

Permit Holder:

The applicant, Cape Fear Site Works Inc. is the property owner [see attached tax record]. Document may be viewed on line at:

http://mainfr.co.cumberland.nc.us/D21LIB/WWW/OASW200.CGI?LRPARC=3472179&TXYEAR=2005&PARCEL=0436-65-0132-

Service Area:

The proposed service area is all of Cumberland County and all adjacent counties including Robeson, Hoke, Moore, Harnett, Sampson and Bladen Counties and Johnston and Lee Counties. The ultimate disposal facility will be either Robeson County Landfill (Hgw NC 20 - St Paul's NC), Cumberland County Landfill (Ann St – Fayetteville NC) or Sampson County Landfill (Waste Industries, Hgw NC 24 – Roseboro NC). Cape Fear Site Works is currently under contract with Robeson County. As a current waste hauler, the applicant / operator is very familiar with local ordinances regulating the transportation and disposal of material at these specified landfills.

Site Plan:

In review of the plans provided in the original application back in July 2005, it does appear that some of the drawings, though drawn to scale, did not have all applicable information shown on the drawings. The effected drawings have been revised and are included with this submittal. It is noted that the transfer facility boundary [shown on the attached plan] is roughly 75 feet by 75 feet. This 1/12th of an acre facility boundary sites basically in the middle of a 10 acre tract of land owned by the applicant. As the plans indicate, no buildings exist within 500 feet of the proposed facility nor are there any streams or wells on the property or adjacent properties [Vacant land surrounds the applicant's property of which none of the features of concern are known to exist]. All existing and proposed built or natural features have been shown. A well is planned for the property; however the well location proposed is over 700 feet from the facility boundary.

It is also noted again, that no material will be stored at the facility except for that material being deposited onto the tip floor and transferred to the transfer vehicle within the 24 hour shift cycle.