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Backus	2/12/2012	16094	2805T-TRANSFER-



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January 3, 2012

Ms. Patricia Backus
NC Department of Environment and Natural Resources
1646 Mail Service Center
Raleigh, NC 27699-1646

Subject: Dare County, North Carolina
Dare County Transfer Station
Dare County, Permit No. 28-05T, Document Id No. 15230
Response to Comments

Dear Ms. Backus:

On behalf of Dare County, CDM provides the following responses to your letter dated September 27, 2011. For clarification, your comments are provided in italics, followed by CDM's comments in bold.

1. **Section 1.3 states that Bowen Company, Inc. operates the transfer station. I believe that the company meets the definition of operator as stated in NCGS §130A-290(a) (21) and, therefore, should be listed as the operator on the facility permit. Please provide contact information including the contact name, address, and phone number for the Bowen Company, Inc. They may be required to supply information for the compliance review.**

Section 1.4 has been updated to include contact information for Bowen Company, Inc.

2. **Section 1.3 states that "residential, commercial, and industrial waste is collected". Residential and commercial are sources of waste and not types of waste. Industrial can be either a source or type of waste. The facility is permitted as a municipal solid waste transfer facility; therefore, it would be more accurate to state that waste is collected from residential, commercial, and industrial sources.**

Section 1.3 has been revised to reflect this comment.

3. **Does the approximate daily rate and monthly rate include waste from Tyrell County?**



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The daily and monthly rate are based on current operations, which includes minimal waste from Tyrell County.

- 4. The first sentence in Section 2 states that the transfer station only accepts MSW as defined by NCGS §130A-290(a) (18a). It seems like you accept more than MSW, but only transfer MSW to the landfill in Bertie County. If this is correct, please modify.**

The first sentence in Section 2 has been revised.

- 5. Section 2.1 indicates that you remove painted concrete that is lead-free for recycling. How do you determine that the paint is lead-free?**

Section 2.1 has been revised to indicate removal of unpainted concrete.

- 6. Section 2.1 states that the facility collects white goods as part of the metals recyclable materials. Please indicate whether any of the white goods contain Freon and if so, address the removal of Freon before recycling.**

White goods are collected by United Salvage and Auto, Inc. United Salvage and Auto, Inc. is responsible for the removal of Freon

- 7. In Section 2.2, the list of waste prohibited from the transfer station includes LCID, wood pallets, and electronics. In the next paragraph it is stated that these prohibited waste are separated at the transfer station. This is similar to my comment number 4.**

Item 4 has been addressed. The materials listed above are prohibited and "if spotted" are removed from the waste. Therefore no additional revisions were made.

- 8. In Section 2.3 and 3.4, the operation at the transfer station is not considered disposal.**

Section 2.3 states removal for appropriate disposal, which is appropriate in the context of this sentence. "Disposal" has been removed from Section 3.4.

- 9. Thank you for providing the deed. I did not see the acreage on the deed. Please provide the total acreage and an estimate of the area occupied by the transfer station operations.**



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The total area of the Dare County Property is 837.8 acres. The transfer station and transfer station access road is located on approximately 5 acres. This information has been provided in Section 1.2.

- 10. Please include in the notification addresses and phone numbers the name and phone number of the environmental senior specialist assigned to the facility. Ray Williams is currently assigned to that position and his direct phone number is (252) 948-3955.**

The above information has been added to Section 2.2.

- 11. I found a few minor edits. In Section 2.1, "ashalt" should be "asphalt". In section 3.2, "opeartion" should be "operation". In Section 3.3, "NCDENER" should be "NCDENR".**

The above noted corrections have been made.

Should you need any additional information, please contact me at your earliest convenience.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'W. Michael Brinchek'.

W. Michael Brinchek, P.E., BCEE
Senior Project Manager
Camp Dresser & McKee

cc: E. Mann, DC
C. Gard, DC

Attachment 1 – Section 1

Section 1

Introduction

1.1 Purpose

The purpose of this permit amendment is to provide general information, an operation plan and certifications for the Dare County Municipal Solid Waste (MSW) Transfer Station. This document provides general instruction for facility management and personnel to operate the facility in accordance with the Department of Environment and Natural Resources (NCDENR) Division of Waste Management – Solid Waste Section. This permit amendment has been prepared in accordance with the practices outlined in NCDENR's Application Guidance for a MSW Transfer Station and consists of the following sections:

- Waste Acceptance Criteria;
- Facility Operations;
- Erosion Control;
- Wash Water and Stormwater Control;
- Disease and Vector Control;
- Sign and Safety Requirements; and
- Access and Security Requirements.
- Record Keeping Requirements

1.2 Facility Location

The Dare County Transfer Station is located on the west side of Highway 264 at 1603 Cub Road, Manns Harbor, Dare County, North Carolina (Northing 35.83498/Easting 75.82002). The location of the transfer station is provided on **Figure 1**. The 837.8 acre parcel has been owned by Dare County since September 21, 1987. The transfer station resides on approximately 5 acres of this property. A copy of the registered deed is provided in **Appendix A**. The site development consists of a transfer station, maintenance building, scale house, C&D landfill, borrow pit, and gravel and asphalt access roads as shown on the Facility Plan provided in **Appendix B**.

1.3 Facility Description

Operations at the Dare County Transfer Station began in December 2006 under Facility Permit No. 28-05T. Dare County contracts with Bowen Company, Inc. to operate the transfer station and to transport waste to the East Carolina Environmental Landfill (Permit No. 08-03) located in Bertie County.



Figure 1 - Location Map
Dare County Transfer Station

Waste from residential, commercial, and industrial sources collected from routes in Dare, Hyde, and Tyrrell counties is accepted at the station. The waste is transported to the transfer station by private haulers, County-owned collection vehicles and County residents. C&D waste collected in Tyrrell County is comingled with MSW at the transfer station and disposed of at the East Carolina Environmental Landfill.

The transfer station processed 50,537 tons of waste from July 1, 2010 through June 30, 2011. The total tonnage processed includes 49,461 tons of waste received from Dare County and 1,076 tons of waste from Hyde County. The station receives approximately 139 tons of waste per day and processes an average of approximately 4,212 tons per month.

Vehicles entering the transfer station are directed by a station attendant. Waste is dumped onto the tipping floor and heavy equipment is used to push the waste through chutes where it is deposited into transfer trailers located in one of two loading bays on the lower level of the building.

1.4 Contacts

The primary contact for the transfer station is the Transfer Station Supervisor. Contact information for the Transfer Station Supervisor and Public Works Director are provided below.

- Mr. Clyde Gard, Transfer Station Supervisor (252) 475-5880
Dare County Public Works Department
- Mr. Edward Mann, Public Works Director (252) 475-5888
Dare County Public Works Department

The physical address for Mr. Gard and Mr. Mann is:

Dare County Public Works Department
1018 Driftwood Drive
Manteo, North Carolina 27954

The Transfer Station Operator is:

Bowen Company Inc.
P.O. Box 394
Belhaven, North Carolina 27810

The contact person for Bowen Company, Inc. is provided below

- George Bowen (252)943-7098
- Stacey Bowen (252)943-8417

Attachment 2 – Section 2

Section 2

Waste Acceptance Criteria

The Dare County Transfer Station shall only accept solid waste as defined herein and only transfer waste as permitted for acceptance at the Bertie County Landfill.

2.1 Recyclable Materials

Each load of waste is dumped onto the tipping floor and inspected for recyclable materials. Materials that are recyclable are separated and are not allowed to stay on the tipping floor for more than 48 hours or two business days. The following recyclables are extracted from the waste prior to loading it in transfer trailers for disposal:

- Tires;
- Concrete (including reinforced and unpainted concrete);
- Asphalt; and
- Metals (propane tanks, drums, white goods, and other).

Tires separated from the MSW are stockpiled adjacent to the transfer station building. Dare County personnel transport the tires to the Dare County Recycling Center located at 1018 Driftwood Drive, Manteo, North Carolina. The tires are picked up weekly at the recycling center by a private company and disposed of at a processing plant located in Waverly, Virginia.

Concrete and asphalt is separated from the MSW and temporarily stockpiled on the tipping floor. A front end loader or similar piece of equipment is used to transport the concrete and asphalt to a storage area located at the end of Cell 4 of the C&D landfill adjacent to Link Road. A private company is contracted to crush the concrete and asphalt as needed. The County uses the processed concrete and asphalt for roadway fill at the adjacent C&D landfill and for other projects throughout the County.

Metals are separated from the MSW and stockpiled on a gravel pad adjacent to the fenced perimeter of the transfer station. Metal recyclables include propane tanks, drums, white goods, and other similar type metals. Dare County employees inspect each propane tank that is collected for recycling to confirm the tank is empty. Following inspection, the tank valve is removed. Metal barrels and drums are only recycled if they are free of liquid and are perforated to ensure that no liquid or hazardous waste is

contained therein. Recyclable metals are transported to the Dare County Recycling Center by Dare County employees, where the materials are separated and collected by private companies for recycling. White goods are collected by United Salvage & Auto, Inc. United Salvage & Auto, Inc. is responsible for the removal of freon from white goods.

Stockpiled metals are not allowed to remain on site for more than 30 days prior to transporting them to the Dare County Recycling Center.

2.2 Prohibited Wastes

The following wastes are prohibited at the Dare County Transfer Station:

- Hazardous Waste;
- Containerized or Bulk Liquid Waste;
- Infectious Waste;
- Medical Waste;
- Animal Waste;
- Electronics;
- Animal Carcasses;
- Radioactive Waste;
- Land Clearing and Inert Debris (LCID);
- Wood Pallets; and
- Asbestos.

Wood pallets, LCID, and electronics are separated from MSW at the transfer station when spotted by transfer station personnel. Wood pallets and LCID waste are transported to the adjacent C&D landfill for disposal. Electronics are stockpiled adjacent to the transfer station building and are transported by Dare County personnel to the Dare County Recycling Center where a private company collects them for recycling.

Signs are posted at the facility entrance and at the perimeter entrance gate to the transfer station warning customers that hazardous waste is not accepted. A report identifying the waste type and hauler will be prepared for any attempted delivery of a prohibited waste. The report will be submitted to:

Mr. Ray Williams
Environmental Senior Specialist
North Carolina Department of Environment and Natural Resources
Washington Regional Office
Solid Waste Section
943 Washington Square Mall
Washington, North Carolina 27889
(252) 948-3955

2.3 Prohibited Wastes – Contingency Plan

Every effort will be made to preclude acceptance of prohibited wastes through education and inspection, but in the case of inadvertent receipt of these wastes, personnel will be available to isolate the material; take appropriate measures, including, but not limited to returning the waste to the generator or removing it for appropriate disposal; and notification to the regulating authorities immediately. In the event hazardous materials are disposed, the initial response will be from the Dare County Haz-Mat team by calling 911.

Attachment 3 – Section 3

Section 3

Transfer Station Operations

3.1 Hours of Operation

The Dare County Transfer Station operating hours are Monday through Friday from 7:00 a.m. to 5:00 p.m. and Saturday from 7:00 a.m. to 12:00 p.m. The transfer station is closed on Sundays and the following holidays:

- Thanksgiving Day;
- Christmas Day; and
- New Year's Day.

A sign is posted near the facility entrance identifying the hours of operation. The transfer station operating hours are subject to change and special circumstances may cause temporary closure. In the event of a hurricane, transfer station operations will cease to prepare for the impending storm.

3.2 Operating Equipment and Personnel

The transfer station utilizes the following equipment for operations:

- Weight Scales and Associated Software;
- Front End Loader;
- (2) Backhoes;
- (2) Yard Dogs (i.e. small tractor trailers used to position transfer trailers on site)
- Transport Tractor Trailers; and
- (4-8) 48-foot Transfer Trailers.

All pertinent personnel operating the transfer station have completed a training course in compliance with G.S. 130A-309.25. A trained employee will be onsite during hours of operation to oversee facility operations. The number of personnel and their title used to operate the transfer station are:

<u>Title</u>	<u>Number of Personnel</u>
Transfer Station Supervisor	1
Transfer Station Attendant	1
Scale House Operator	1
Equipment Operators	6

3.3 Operating Procedures

All vehicles delivering waste to the facility are directed to the scale house for weighing. Once vehicles are weighed they are directed west along Cub Road to the transfer station entrance on the left. Vehicles entering the transfer station follow the access road to the tipping building access apron. The tipping building apron provides access to the south side of the transfer station, which opens to the 14,000 square foot tipping floor.

The tipping building has 10-foot high push walls running along the interior walls and in the center that allow equipment operators to direct waste to chutes feeding transfer trailers waiting in bays on the lower level of the building. The building is divided into two separate tipping areas that are used to process waste. The County may use one of the two tipping areas for MSW and the other for processing a different waste stream (e.g. LCID) should the County choose to modify its current waste acceptance policy. Approval will be obtained from the NCDENR Solid Waste Section prior to implementing any changes to the current waste acceptance policy.

The transfer station operator will direct vehicles waiting to unload onto the tipping floor. Adequate area is available at the tipping building access apron for drivers to queue their vehicles into a backing maneuver. Transfer station personnel are on the tipping floor to guide each vehicle to a designated area for unloading. Each load of waste is inspected for recyclables and prohibited wastes. Prohibited wastes are outlined in Section 2.2. Inspected waste is directed to a chute using a front end loader or similar piece of equipment, where it is deposited into a transfer trailer.

3.4 Waste Screening Operations

Access to the transfer station is controlled at the scale house. All waste entering the station must pass the scale house before entering the tipping floor. Each load is subject to visual inspection for prohibited waste at the scale house. Loads are visually inspected by transfer station personnel as they are discharged onto the tipping floor. Should prohibited waste be identified, transfer operations will be terminated; and material from the hauler will be reloaded onto the vehicle and removed from the facility as practicable. Reporting of the illicit event will be recorded and reported as defined in Section 2 of the Operation Plan.

3.5 Windblown Litter Control

All collection vehicles with waste are required to have their loads covered upon arrival at the scale house or fully enclosed to minimize windblown litter. Outbound transfer trailers are also required to cover their loads. The transfer station is enclosed on three sides, which helps minimize windblown litter. Throughout the day and at the end of each day, the transfer station operator observes the area for windblown litter. Windblown litter discovered throughout the day is placed in on-site trash bins. Occasionally, Dare County uses inmates from the Tyrrell Prison Work Program to assist with the collection of windblown litter.