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| Backus | 9/27/2011 | 15230 | 28-05T |



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

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

September 27, 2011

Mr. Edward Mann
Public Works Director
Dare County
P.O. Box 1000
Manteo, NC 27954

Re: Application Completeness and Review
Dare County Transfer Station
Dare County, Permit No. 28-05T, Document Id No. 15230

Dear Mr. Mann:

On August 18, 2011, the Division of Waste Management, Solid Waste Section (Section) received a permit amendment application for the continued operation of the Dare County Transfer Station (DIN 15201). The application was submitted on your behalf by Camp Dresser & McKee. The appropriate permit fee has also been received.

Your application can now be considered complete within the context of NCGS §130A-295.8(e). A determination of completeness means that that application includes all required components but does not mean that the required components provide all of the information that is required for the Section to make a decision on the application.

Under NCGS §150B-3, when an applicant makes a timely and sufficient application for issuance of a permit, the existing permit does not expire until a final decision on the application is made by the Section. Therefore, until the final decision is made, Dare County is authorized to continue operation of the Dare County Transfer Station in accordance with your most recent Solid Waste Permit and the Solid Waste Management Rules (15A NCAC 13B).

In addition, a technical review of the application has been conducted. Please address the following comments and questions concerning the application. Modify the application where appropriate.

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.
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.

3. Does the approximate daily rate and monthly rate include 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.
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?
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.
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.
8. In Section 2.3 and 3.4, the operation at the transfer station is not considered disposal.
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.
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.
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".

Please provide a response for each comment and/or revise the application as appropriate.

If you have any questions, please contact me at (919) 508-8520 or by email at pat.backus@ncdenr.gov. Please note that after October 24th, my phone and fax number will change to (919) 707-8257.

Sincerely,



Patricia Backus, P.E.
Environmental Engineer
Solid Waste Section

cc: W. Michael Brinchek, P.E., BCEE, Camp Dresser & McKee
Ed Mussler, P.E., Permitting Branch Head
Dennis Shackelford, Eastern District Supervisor
Ray Williams, Environmental Senior Specialist