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Backus	9/21/2011	15194	32-12T



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

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

September 21, 2011

Mr. Chris Marriott
Disposal Manager, City of Durham
1833 Camden Avenue
Durham, NC 27704

Re: Application Review
City of Durham Transfer Station
Durham County, Permit No. 32-12T, Document ID No. 15194

Dear Chris:

I apologize for the delay in my review of the application modifications dated July 1, 2011. As I mentioned to you, the Division of Waste Management, Solid Waste Section (Section) has been working with other agencies on asphalt shingle recycling. I have included the guidance document the Section prepared based on those discussions. Below are suggestions and some requirements based on the review.

1. Review the asphalt shingle recycling document. In Appendix A contains an example of what an operation plan might look like for a solid waste facility such as your transfer station. Modify your plan as necessary.
2. When the operation plan for asphalt shingle recycling is approved, it will allow the City of Durham (City) to send shingles to GreenCycle, a non-permitted shingle grinding facility. Sorted shingles that are processed using the plan could also be sent to other non-permitted shingles grinding facilities and asphalt plants. Therefore, you may want to make your plan less specific to GreenCycle to allow for flexibility. [Note: Asphalt plants may only recycle tear-off shingles if it is included in their air emissions permit issued by the Division of Air Quality.]
3. The operation plan must address how the requirements will be communicated to the roofers dropping off shingles for recycling. Appendix B of the recycling document includes a chart listing what is and isn't acceptable for recycling. The transfer station and facilities not permitted by the Section are only allowed to remove minimal amounts of non-shingle material. Therefore, source separation at the job site is also required. Communicating these requirements will make the transfer station's job a lot easier and allow you to recycle without a processor permit.
4. The source of the shingles will have to be documented. The roofer dropping off the shingles fills out the supplier certification form, not the transfer station. This has always been a recommended best practice. It is now clearly defined as a requirement in DAQ and DOT specifications. The requirement comes from the Asbestos National Emission I would assume that anyone accepting your shingles would need a copy of the supplier certification form, otherwise, they won't be recyclable. Appendix B of the shingles document includes a supplier certification form. An electronic version of the fill-in pdf is also available if you would like it.

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Please provide a response for each item and/or revise the application as necessary.

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,

A handwritten signature in black ink that reads "Pat Backus". The signature is written in a cursive, flowing style.

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

Enclosure

cc: Ed Mussler, P.E., Permitting Branch Head
Dennis Shackelford, Eastern District Supervisor
John Patrone, Senior Environmental Specialist