



Dee Freeman., Secretary

Solid Waste Section
January 30, 2009

Mr. Danny Bagley, Manager
Edgecombe County Solid Waste Management Department
P.O. Box 10
Tarboro, North Carolina 27886

Re: Comments on the Application of Permit Amendment for a Five-Year Review of Edgecombe County Transfer Facility, Edgecombe County, North Carolina
Permit No. 33-02T, Document ID No. 6689

Dear Mr. Bagley:

This letter constitutes a review of the Application for Permit 5-year Review Amendment (the Application) at the above- referenced facility. The Application is entitled:

- *Operation Plan - Edgecombe County Transfer Facility (Permit # 33-02T)*. Prepared by: S&ME, Inc., Raleigh, NC. Prepared for: Edgecombe County. June 30, 2008. DIN 6673.

The Solid Waste Section conducted a review of compliance with the Solid Waste Management Rule (Rules), 15A NCAC 13B .0400 and the 2008 draft guidance document <H:\Permitting\BranchProjects\Transfer Stations\MSW transfer station applic 9-22-08.doc>. Your responses to the following comments will expedite the review of the Application:

General

1. At this transfer facility there are several waste processing, handling, and temporary storage units including a convenience center, a yard waste processing area, a white goods staging area, and a pesticide container storage building. The operation plan needs to describe the physical features of each unit and the day-to-day operation and management of these units. The plan for each unit may include, but not limited to, prevention from surface water to contact wastes (surface water management), the maximum tonnage allowed to be stored at any time at the facility, fire prevention (especially for the yard waste processing area), vector controls, equipment and machinery used for operations, applicable health and safety provisions, the estimated tonnage received per a fixed period (based on the historical data), the contact information of a contractor, recycler, or recovery facility to handle the waste off-site transportation and recycling, and the frequency or schedule to remove the waste off-site.
2. Is there a written contingency plan available in the operating records at this facility? In the event of an unintentional incident of receiving prohibit wastes (especially hazardous wastes/ substances), the operator would know how to readily manage requirements such as reporting, waste segregation, containment, isolation, characterization, and disposal by following the procedures described in the contingency plan. The contingency plan should also address the management and handling procedures for the unexpected events & conditions including, but not limited to, equipment breakdown, spills, unusual traffic patterns, long-term power outages and natural disasters affecting operations. Please clarify.

3. What are provisions are there for regular inspections conducted at the transfer facility? Who will conduct the inspection and what are the items/conditions requiring to be regularly inspected? Should any unsatisfactory conditions are reported, how the things are following up? Where will the inspection and follow-up records be maintained? Please clarify.

Section 1 – Background Information

4. (Section 1.2) Please provide the facility physical address and the contact information – name, phone number, and e-mail address. If the contact information changes prior to the permit expiration date, the new information needs to be placed in the operating record and later updated in the permit application.
5. (Section 1.2) Please add the convenience center and pesticide container storage building to the “other waste operations on the facility property.” Additionally, to avoid any potential confusion, please clear statements to indicate the C&D landfill and tire collection area are located on the parcels on the west side of Colonial Road/ State Route 1601. The operations of C&DLF and used tires need be addressed in the separate permit application.
6. Please provide the property information, including the total acreage and a legal description of the property and a complete copy of the land deed, on the east side of the Colonial Road/ State Route 1601 used for the transfer and storage operation including trailer staging areas, the convenience center, the MSW transfer facility, a yard waste processing area, a white goods staging area, a pesticide container storage building, and etc.
7. (Section 1.3) In the June 1998 Operation Plan the size of the transfer facility was documented as 10,000 square feet; the zoning approval letter from Edgecombe County dated May 21, 2008 described the transfer facility was in a minimum of 30,000 square feet; the June 2008 Operation Plan said the facility occupied a 42,000 square feet cover tipping floor with a depressed truck-loading bay. Has the facility been expanded during the past 10 years since the original permit to operate was issued? If so, please describe the history of the facility expansion.
8. (Section 1.3) Please provide the narrative descriptions of the structure, material, and current condition of the trailer staging areas.

Section 2 – Waste Acceptance and Disposal

9. Please provide the information of the final permitted disposal facilities where will receive wastes leaving from the transfer facility; the information includes, but not limited to, the facility name, permit number, and physical address.
10. Please provide the information (including, but not limited to, the facility name, permit number, and physical address) of the alternative disposal sites if the designated disposal facility cannot accept the wastes leaving the transfer facility for certain unexpected and unforeseeable reasons.
11. Please provide the information of the proposed maximum daily tonnage to be received at this MSW transfer facility.
12. (Section 2.2) According to the standard practice of the waste industry and recommendations from the advocacy groups (such as SWANA), the prohibited wastes also include PCB wastes defined in 40 CFR 761, fluorescent and high-intensity discharged lamps, ashes, and incinerator residuals. Please add these wastes to the prohibited waste list in Section 2.2.
13. What provisions are there to manage/handle the containerized wastes (wastes in container, drum, or barrel) that come to the facility?
14. How many employees will be at the transfer facility at all times during operating hours? Please clarify.

Section 3 - Leachate Management

15. On Figure 3 please add the gravity drainage system layout (floor slopes, floor drains, a grease trap, and a holding tank) to the MSW transfer facility.

16. Is there a secondary containment system in place to prevent any potential spill/leaking or overflow the 5000-gallon leachate holding tank? The Division's Facility Compliance audit Report dated July 21 2006 noted the observation of potential spill/overflow problem of the holding tank. Please describe how this problem been properly resolved since then?
17. Are there any routine practices at the facility to remove sediment/residual trapped or deposited in the bottom of floor drains, sumps, or grease traps? At what frequency? Has the practices been documented and placed in the operating record? Please clarify.

Section 4 – Fire Control

18. What provisions are there to prohibit an open burning of waste at the facility? Please clarify.

Section 6 – Facility Cleaning

19. The tipping floor, hopper, walls around tipping floor, and loading bay - transfer trailer loading area shall be washed down at the end of each operating day and any time as needed to maintain the facility in a clean, sanitary condition. Please revise the Section accordingly.

Section 8 - Access and Signs

20. The emergency contact and phone number need be shown on the posted sign at the facility entrance. Please add this requirement to the Section 8.4.

Signature pages

Please sign the attached "Signature Page of Applicant." The completed and signed forms need to be submitted the Division along with the responses to the above-referenced comments.

Please incorporate requested information, document, revisions, and responses to a new submittal including a written hard copy and an electronic copy (including figures) of the revised Application. The Solid Waste Section appreciates your efforts and cooperation in this matter. If you have any questions or would like to schedule a meeting to discuss this matter further, please contact me at (919) 508- 8507.

Sincerely,



Ming-Tai Chao, P.E.
Environmental Engineer II
Solid Waste Section

Enclosure

cc: John A. Moody, P.E., S&ME, Inc.
Donna Wilson, DWM
Ben Barnes, DWM

Ed Mussler, Permitting Branch Supervisor
Dennis Shackelford, DWM
Central Files

Signature page of applicant –

Name of facility _____

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision and that the information provided in this application is true, accurate, and complete to the best of my knowledge.

I understand that North Carolina General Statute 130A-22 provides for administrative penalties of up to fifteen thousand dollars (\$15,000.00) per day per each violation of the Solid Waste Management Rules. I further understand that the Solid Waste Management Rules may be revised or amended in the future and that the facility siting and operations of this solid waste management facility will be required to comply with all such revisions or amendments.

Signature

Print Name

Date

Title

Business or organization name