



North Carolina Department of Environment and Natural Resources

Division of Waste Management

Dexter R. Matthews

Director

Beverly Eaves Perdue
Governor

Dee Freeman
Secretary

May 4, 2010

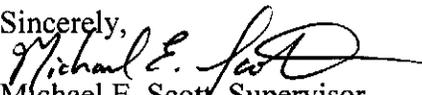
Steve Pendry, Manager
City of High Point Ingleside Solid Waste Composting Facilities
3001 Ingleside Drive
High Point, NC 27265

Subject: City of High Point
Ingleside Large Type-1 Solid Waste Composting Facility
Permit Renewal Application and Operation Plan
Facility Permit No.: SWC-41-10

Dear Mr. Pendry:

The Division of Waste Management Solid Waste Section has completed its technical review of the subject Permit Renewal Application and Operation Plan. A copy of the comments resulting from the review is attached for your reference. These comments are also being sent to your engineer, Pieter K. Scheer, P.E. of Richardson Smith Gardner & Associates Engineering & Geological Services by copy of this letter. A revised Permit Application and Operation Plan of that incorporates responses to these comments should be submitted for our review and approval as soon as possible. Providing thorough and complete responses to these comments in a timely manner is necessary to avoid delays of the Division's decision on the Permit Application.

If you or your engineer have any question or need assistance in resolving the technical review issues, please contact Mr. Zi-Qiang Chen, PhD, at (919)-508-8523. Also, you may contact me at (919)-508-8508.

Sincerely,

Michael E. Scott, Supervisor
Composting & Land Application Branch

ZQC:dr

Attachment (all cc's)

cc: Pieter K. Scheer, P.E. , Richardson & Asso., 14 N Boylan Ave, Raleigh, NC 17603
Hugh Jernigan, NCDWM Field Operations Branch
Zi-Qiang Chen, Ph.D., Environmental Engineer II
DWM/SWS/CLA/PERMIT

**CITY OF HIGH POINT
Ingleside Compost Facility**

**Technical Review Comments
for
Large Type-1 Solid Waste Composting Facility Permit Application
and the Operation Plan
Facility Permit No.: SWC-41-10**

May 4, 2010

NOTE: Please provide a response to all of the comments on a “comment for comment” basis. Where appropriate, add or revise narrative in the text of the Permit Application that addresses the issues discussed in the comments. In addition, the comments and responses may be included as a part of the revised Permit Application and Operations Manual (e.g. in an appendix).

I. General

1. In accordance with NCGS 130A-295.8(c), a large composting facility shall pay a fee of \$1,250 for its permit renewal.

II. Permit Renewal Application (§)

1. Page 4, §4.2: Provide an updated local zoning letter from City of High Point Planning & Development Department to replace the existing letter which was issued more than 10 years ago (in 1999).
2. Page 4, §4.4: Clarify if there are seasonal variations in the incoming wastes in the facility. If so, provide a chart to show the monthly or seasonal variations of the incoming wastes.
3. Page 4, §4.4: Provide the tonnage of incinerated ash received at the facility during the FY 2008-2009.
4. Page 4, §4.4: Provide a copy of the latest analytical result of the incinerated municipal sludge ash.
5. Page 6, §7.6: Provide a copy of the chemical analyticals, nutrient levels, and pH level(s) of the “engineered soil”.
6. Page 6, §8.1: Provide a preliminary engineering calculation to demonstrate that the active windrow area can accommodate the design capacity of 25,000 tpy at the proposed production

pace (9-12 weeks for windrowing plus 3-4 weeks for stabilizing.) and windrowing dimension.

7. Page 6, §8.2, and Appendix A: Insert the 25,000 TPY process capacity at the top/beginning of the flow diagram, and demonstrate how much end products are produced at each of the processing boxes and at the end/bottom boxes of the flow diagram.
8. Page 9: Provide an update of the City's application for the facility's storm-water permit at NCDWQ, and a copy of the permit if available.

III. Operations Plan (§§)

1. Page 4, §§ Windrow Method: Specify the windrow dimension.
2. Page 8, §§ Acceptable Materials: Change the word of "biodegradable" to "compostable".
3. Pages 8-9, §§ Preparation of Materials: Provide a typical composting mixing receipt the ICF facility utilizes to mix wood wastes and yard/silvicultural wastes to achieve an ideal initial C:N ratio of 40:1 to 20:1.
4. Page 10, §§ Windrow Construction: Specify what testing procedures are used to determine proper moisture level in the windrow.
5. Page 14, §§ Odor, Dust, and Vector Control: detailed discussion in this section to address what kinds of corrective actions would be taken if an offensive odor occurs and/or crosses the property boundary.
6. Page 16: Clarify how and how often monitoring equipment, such as temperature probes, are calibrated at ICF.