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

Beverly Eaves Perdue  
Governor

Dexter R. Matthews  
Director

Dee Freeman  
Secretary

April 11, 2012

Mr. John Pflieger  
Environmental & DOT Compliance Specialist  
3301 Benson Drive, Suite 601  
Raleigh, NC 27609

Subject: Permit Amendment Application Review  
Weldon Waste Transfer Facility  
Permit 42-05T, Halifax County, Document ID No. 16426

Dear Mr. Pflieger:

I have reviewed your permit amendment application for the continued operation of the Weldon Waste Transfer Facility (Permit No. 42-05T).

I have some comments and questions concerning the operation plan. Please note that in my review I also referred to the comments and observations in the Facility Compliance Inspection Report issued after the February 29, 2012, site inspection. Some questions relate to that comparison.

Please address the following comments and questions concerning the operation plan.

1. The operation plan states that operation of the facility is currently contracted to First Tee Transport, LLC. The site inspection report implied that First Tee hauls the waste. Please confirm that they do both.
2. At the end of the first sentence under "I. Introduction", "Section" should be removed because you do not reference a section of the rules in this sentence.
3. Please modify the first sentence of the second paragraph to indicate that the waste is municipal solid waste. This can be done by changing the beginning of the sentence to read "Collection vehicles delivering municipal solid waste from the operation of residential, commercial, industrial, governmental, or institutional establishments and recyclable materials to the facility ...." This would be more consistent with the statutory definition.
4. According to NC General Statutes, "recycling" is a process and "recyclables" are materials. Therefore, it would be best to state "recyclable" materials rather than "recycling" materials. (See comment 3.) Again, this is more consistent with the statutory definition.
5. In the last sentence on page 3, it is stated that all trailers are required to weigh using the above ground scales prior to leaving the facility. However, near the end of the first paragraph on page 4, it is stated that vehicles that do not have tare weights previously recorded are required to exit via the outbound scale. Please explain if there is a difference or make consistent.

6. Under “B. Receivable Waste”, it is stated that some wastes are prohibited unless a separate waste determination is made and applied for. Doesn’t this also have to be approved by the receiving facility? Is this done prior to acceptance of the material?
7. The Division of Waste Management recently moved. Please change the phone numbers listed in sections II.B and II.D to (919) 707-8200.
8. The Solid Waste Section (Section) has a Fire Occurrence Report that is available on our portal site, <http://portal.ncdenr.org/web/wm/sw/forms>. Please include a copy of the form in the operation plan.
9. The hours of operation listed in section IV, Hours of Operation, are different from the hours of operation shown on the Facility Compliance Inspection Report. The report listed the hours of operation as 8:00 AM to 4:30 PM Monday through Friday and 8:00 AM to 12:00 PM on Saturday, while the operation plan states 6:00 AM to 8:00 PM Monday through Friday and 7:00 AM until 12:00 pm on Saturday. Please check and confirm the operation plan has the correct information.
10. The operation plan should address random screening including the frequency and procedure. Add this procedure to the operation plan and include any forms that you use to document this.
11. Please provide more information on how recyclables are handled and managed? Are they received source separated, or comingled? Are they separated at the facility? Are they stored on site? Etc.
12. Check the use of the word “should” in the plan. It tends to be interpreted as something that may not be required so I would prefer to state that important activities “are” or “will” or “shall” be done. For example, under Fire Control, “fire extinguishers are routinely inspected” and under Disease and Vector Control, “The transfer station concrete floor will be cleaned at the end of operations each day”.
13. In the last sentence of “M. Access Roads”, I believe you meant to say the roads shall be re-graded rather than regarded.
14. Please indicate what is included in the “normal bookkeeping”. Somewhere the plan should address all the information that the scale house records. I want to make sure that you are documenting information such as the county of origin of the waste received and the destination of the waste/recyclables/etc. This is required for the annual report.
15. Please include a site plan drawing or aerial photo with areas of operation indicated.

If you have any questions or can be of further assistance, please contact me a (919) 707-8257 or by email at [pat.backus@ncdenr.gov](mailto:pat.backus@ncdenr.gov).

Sincerely,



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

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