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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

March 11, 2009

Mr. Melvin R. Nichols
Hertford County Rural Public Works
P.O. Box 116
Winton, NC 27986

Re: Permit Amendment Application Review
Hertford County Transfer Station
Hertford County, Permit No. 46-02T, DIN 6998

Dear Mr. Nichols:

The Division of Waste Management, Solid Waste Section has completed a technical review of the application submitted by Municipal Engineering Services Company for the continued operation of the Hertford County Transfer Station. Comments and questions are provided below and organized based on the section headings in the application.

Application Format

1. Please add a title at the beginning of the application, number the pages, and include a submittal or revision date on the pages.
2. Please add the following contact information for the Division of Waste Management to the document.

North Carolina Department of Environment and Natural Resources
Division of Waste Management
401 Oberlin Road, Suite 150
Raleigh, NC 27605
1646 Mail Service Center
Raleigh, NC 27699-1646

Phone: (919) 508-8400
Fax: (919) 733-4810

Division of Waste Management – Solid Waste Section
Field Operations Branch Head: Mark Poindexter
Eastern Regional Supervisor: Dennis Shackelford
Waste Management Specialist: Chuck Boyette

3. Please provide a site plan that is up-to-date and includes buildings, scales, storage areas, roads, fences, gates, etc. that support the waste management activities stated in the application. Also include the facility boundaries.

Section I. Introduction and Background

4. The last sentence in this section is confusing (“this plan is to provide guidelines for the operation of the transfer facility on Mt. Moriah Road in accordance with this plan”). The purpose of the operation plan is to describe how the facility will be maintained and operated in accordance with North Carolina Solid Waste Management Rules and sound environmental and waste management practices. Please revise.

Section II. Facility Location

5. The last sentence would be more appropriate as part of the facility description.
6. I believe you meant concrete pads rather than cement pads.

Section IV. Facility Description

7. Please check for the consistent use of the terms “transfer station” and “facility” throughout the application. The name of the facility is “Hertford County Transfer Station” but later the “concrete tipping floor with a single loading area located along the southeastern side of the facility” is called the transfer station. It is confusing. You may use whatever terms you wish as long as the usage is consistent and clear so anyone reading it will know what you are describing.
8. Please review and check the use of “will” when describing buildings, areas, equipment, etc. It should be clear what exists as opposed to something that will be added in the future.
9. The facility description did not include all the items that were listed in Section II as being on site.

Section V. Source, Types and Quantities of Waste

10. Please include waste quantities.
11. Please check the consistent use of “transfer station” in this section.
12. Because your waste is transferred to the East Coast Regional Landfill for disposal, you should review the list of waste banned from their facility and included it in your list. If you have done this, please mention it in the application.
13. I would suggest adding a section or paragraphs in the Operation Plan that consolidates the information concerning waste acceptance. The section/paragraphs should include a list prohibited waste, a description of the inspection and screening processes, and a description of what will be done if unacceptable waste is encountered.

Section IV. Operation Plan, A. General

14. The last sentence of the first paragraph states that an entrance sign “will” be posted. Is there currently an entrance sign? Please list all the information that is included on the sign (e.g., facility name, facility permit number, operating hours, etc.)

15. How is traffic directed? Is a person directing vehicles? Are signs posted on the roads or buildings? Please include this in the operation plan.
16. The Operation Plan should describe the management of all waste accepted at the facility. How are Construction and Demolition Debris waste, tires, white goods, and recyclable waste managed? The areas used for storage of these waste should be noted on the site plan.

Section IV. Operation Plan, B. Equipment

17. Could you describe the use of the open-top transfer boxes and their location at the facility? Are they under roof? If not, how do you contain and treat water that has come into contact with the waste?
18. Again, check the use of “transfer station” in this section. Is this equipment only used at the tipping floor?

Section IV. Operation Plan, C. Personnel

19. This section should list the staff that will be on site during daily operations by their job title and responsibility. Indicate the employee training, certification, or other requirements. If there is required training, is the use of the backup employees limited to specific jobs?

Section IV. Operation Plan, D. Waste Transfer

20. Again, check the use of “transfer station”, “facility”, etc.
21. Include all the information that you collect at the scale house, such as the source of the waste, type, etc.
22. What is done if the facility attendant discovers waste that is unwanted or prohibited?

Section IV, Operation Plan, E. Wastewater Management

23. Are there any locations at the facility, other than the tipping area, that are not covered and may come in contact with water?
24. Water that comes into contact with solid waste must be treated prior to discharge. Your plan says that you empty the holding tank as needed but does not say what you do with the wastewater. Please provide more information. If it is sent to a wastewater treatment facility please provide the facility name.

Section IV. Operation Plan, F. Hazard and Nuisance Control

25. As I previously suggested, I would combining the information on unacceptable waste in this section with other waste acceptance information in the Operation Plan. Provide more information on your randomly checks. How often do you perform them? Do you have a form to record the inspections? Do you document them in the facility operating record? Please be more specific about who should be notified in the event undesirable or prohibited waste is received. You could reference the information I provided in comment 2.
26. Do you washdown the tipping pad? If so, how often? If you don't washdown the tipping pad, what do you do to keep the facility sanitary? Please include this in the Operation Plan.

27. Are the on-site personnel responsible for handling fires with water from the onsite well? What equipment is provided? Are personnel trained on the use of fire extinguishers or fighting fires with the onsite water?
28. Please identify the local volunteer fire department that will be called and their location and distance from the transfer station.
29. The transfer facility rules require that an appropriate method shall be provided to confine material subject to be blown by the wind within the area. The operation plan does not address this. There is a higher probability for this at this facility because the tipping area does not have walls.
30. The transfer facility rules require that at the conclusion of each day of operation, all windblown material resulting from the operation shall be collected and returned to the area by the owner or operator. The operation plan should state this.
31. Do you have contingency plans in case of bad weather, equipment failures, power failures, etc.? Please include them.

Please review the application and operation plan based on these comments and questions and note the revision date. A paper copy plus one electronic copy are needed. Please proofread your submittal carefully.

A timely response would be appreciated. If you have any questions regarding this matter please contact me at (919) 508-8525, or by email at pat.backus@ncmail.net.

Sincerely,



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

cc: Wayne Sullivan, MESCO
Ed Mussler, DWM
Dennis Shackelford, DWM
Chuck Boyette, DWM
Central files