



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

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

May 4, 2012

James Maides
Green Recycling Solutions LLC
166 Center Street
Jacksonville NC 28546

Re: Partial Comments on Site Suitability Report
Green Recycling Solutions C&D Landfill
Jones County, North Carolina
Doc ID No. DIN16563

Dear Mr. Maides:

The following are comments related to a technical review of the Site Suitability Report submitted in support of the above referenced project. These comments will need to be addressed before further action will be taken on the project. Please note that comments relating to the hydrogeologic submittals will be sent to you separately.

1. Comments submitted by the State Clearinghouse agencies are specific to the construction of a 6-inch water line and 1500 lf of new road improvements to the proposed Green Recycling Solutions facility on US Hwy 17, but do not address the construction and operation of the proposed C&D Landfill.

We note that the SEPA Project Name is 'Green Recycling Solutions Water and Road Improvements.' Location maps and some discussion of the project in the SEPA Clearinghouse submittal refer to the proposed Recycling and C&D Landfill facilities, but the Clearinghouse comments do not.

In addition to the other items listed below and in the Hydrogeology review letter, we will need comments from the Clearinghouse stating that the construction and operation of the proposed C&D landfill facility and the associated operations will not have a significant environmental impact before we can complete the review of the Site Suitability Report.

2. We note for future reference that a permit application for the associated material recovery facility would need to be submitted upon completion of the C&D landfill Site Suitability phase.
3. NCGS 130A-295.6 (d) restricts the proximity of the proposed landfill to National Wildlife Refuge [5 miles], State Wildlife Resources Commission gameland [1 mile],

State Parks component [2 miles]. Please provide demonstrations that the proposed site complies with these restrictions.

4. NCGS 130A-295.6 (b) requires wetlands buffer of 200 feet unless special circumstances are demonstrated, but then no less than 100 feet. Please review the statute for requirements that the site must meet to qualify for a buffer of less than 200 feet.
5. The Facility Plan and Report does not appear to anticipate [page 5] a flexible membrane liner or leachate collection system as required under NCGS 130A-295.6 (e) and (h).
6. A Traffic Study as required under NCGS 130A-295.5 will need to be submitted.
7. Following successful completion of the SEPA process, you would then [i] be eligible to submit an application for a Permit to Construct a C&D landfill, [ii] be subsequently invoiced for a permit application fee [\$15,000] for the C&D landfill, and [iii] sent a Compliance History Review questionnaire that you would need to complete and submit.
8. Please note that the N.C. Solid Waste Management Rule 15A NCAC 13B .0201 prohibits land clearing, grading or construction of a solid waste management facility until a permit to construct is issued. Also, the rule prohibits solid waste management activities until issuance of a permit to operate.

Thank you for your cooperation in this matter. If you or Dave have any questions about the above comments or wish to further discuss the project, please contact me at 919.707.8252.

Sincerely,

Geoffrey H. Little
Environmental Engineer II

c: Michael Scott, DWM
Ed Mussler, DWM
Elizabeth Werner, DWM

Dave Wasiela, ERM NC, Inc.
Ray Williams, DWM