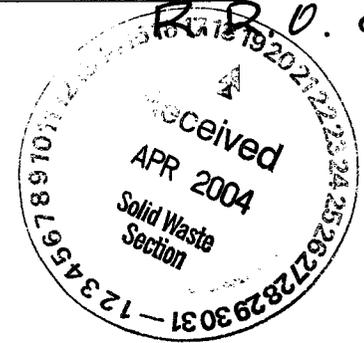


MRR Southern, LLC
2005 Rolling Road
Greensboro, NC 27403
Phone (336) 230-0896 Fax (336) 378-1945

92-31
PERMIT
MOD. #1
PTU 2/18/05
WOOD WASTE AREA
ONLY
R.D. copy

April 16, 2004

Mr. Jim Barber, Head
Permitting Branch
Solid Waste Section
DENR-Division of Waste Management
1614 Mail Service Center
Raleigh, NC 27699-1646



**RE: Material Recovery, LLC C&D Landfill
Wake County, NC, Permit No. 92-31
Proposed Wood Debris Handling Area**

Dear Jim,

The purpose of this letter is to request the Section's approval of a wood debris handling area at our Wake County facility. The primary purpose of the specified area is for staging, grinding, and temporary storage of yard waste, and storm-related and other untreated/unpainted wood debris.

In order to facilitate your review of this proposal we have attached a site plan defining the limits of our proposed wood debris handling area (Drawing No. 1), and an addendum to the facility's Operations Plan which addresses such issues as fire control, ingress/egress, stockpile/storage capacities, equipment to be utilized, schedule for grinding of debris, and potential markets for the debris.

Upon approval of this proposal, the attached Table of Contents page, Operations Plan addendum pages and associated drawing should be added to the existing permit documents. The 'Plan' should be added as Appendix 6 to the existing *Volume 2 - Construction Plan Application*. Also, with this letter we are requesting that, upon approval of the plan, the Solid Waste Section add our facility to the list of sites pre-approved for handling of storm debris, i.e., storm debris staging sites.

In closing we would like to thank you for your assistance with this project. Please contact Chris Roof (919-835-3655) or me (336-230-0896) if you have any questions or concerns related to this request.

Sincerely,
MRR Southern, LLC

Daniel R. Moore, P.G.
Environmental Manager

Attachment: *Appendix 6, Wood Debris Handling Area - Operations Plan Addendum*

c: F. Norbert Hector, Jr., Managing Member (w/o attachments)
Christopher T. Roof, General Manager
Wilbert Carter, Landfill Manager

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APPENDICES

Appendix 1	Property Boundary Survey and Legal Description
Appendix 2	Random Waste Screening Forms <ol style="list-style-type: none">1. Waste Inspection Form2. Refuse/Unidentified Waste Inspection Form3. USEPA Hazardous Waste Inspection Decision Tree
Appendix 3	Seeding Specifications
Appendix 4	Erosion and Sediment Control Plan
Appendix 5	Post Closure Inspection Forms <ol style="list-style-type: none">1. Post Closure Maintenance Record2. Groundwater Monitoring Well Maintenance Record
Appendix 6	Wood Debris Handling Area-Operations Plan Addendum

APPENDIX 6
Wood Debris Handling Area
(Operations Plan Addendum)

Rev 0, April 16, 2004

APPENDIX 6

Wood Debris Handling Area

(Operations Plan Addendum)

Contents

- 1.0 Overview
 - 2.0 Area Location and Description
 - 3.0 Ingress/Egress and Working Surface Descriptions
 - 4.0 Stockpile and Storage Capacities
 - 5.0 Operational Equipment and Debris Disposal
 - 6.0 Fire and Safety
-

1.0 Overview

The purpose of this *Wood Debris Handling Area-Operations Plan Addendum* is to address the primary operational and safety issues associated with the site. Discussed in the following paragraphs are such issues as fire control, specification of the ingress/egress route, stockpile/storage area capacities, equipment to be utilized, schedule for grinding of debris, and potential markets for the debris.

The primary purpose of the wood debris handling area is for staging, grinding, and temporary storage of yard waste, and storm-related and other untreated/unpainted wood debris. The area will serve all commercial, private, and public entities within the facility service area.

All physical features discussed in the plan are displayed on Drawing No. 1 found at the conclusion of this text.

2.0 Area Location and Description

The wood debris handling area is located on the eastern end of the southern disposal area. This area of the site will not be utilized for disposal activities for at least 10 or more years. The handling area is approximately 2 acres in size and is conveniently located within a reasonable distance of the site scales/office and an existing all-weather haul road leading to the northern disposal area. The area is buffered from Brown-Field Road by an

existing earthen/landscaped berm that runs parallel to the road. As noted on the attached drawing, the defined area is within the limits of a future disposal cell and therefore meets all applicable buffer requirements associated with a construction and demolition debris landfill. Descriptions of the access route and the working area pad are provided in the following section.

3.0 Ingress/Egress and Working Surface Descriptions

As located on Drawing No. 1, access to and from the site will be on a gravel/aggregate, all-weather haul road. The access road will be approximately 22 feet wide and will be constructed and maintained with a minimum 0.5-foot thick compacted gravel/aggregate base. Turn-around and unloading/loading will take place within the defined handling area. The access road will be clearly marked with a sign at the intersection of the main haul road so as to differentiate it from the road leading to the northern disposal area.

The wood debris handling area limits are shown on Drawing No. 1. The corners of the area will be clearly identified in the field with iron pins.

4.0 Stockpile and Storage Capacities

The wood debris handling area is approximately 2 acres in size, measuring approximately 200 feet by 400 feet on the ground. No more than 6000 cubic yards of combined unprocessed/processed material will be stored in the area at any given time, without the prior written approval of the Solid Waste Section.

5.0 Operational Equipment and Debris Disposal

The landfill facility currently owns and maintains sufficient equipment to handle all operations associated with the stockpiling, processing, incidental movement, and hauling of wood waste and storm debris. Current applicable site equipment includes an excavator, articulated dump truck, and bulldozer. MRR Southern, LLC also currently owns and operates two wood grinding machines in North Carolina. Both machines are capable of being mobilized to the wood debris handling area at this facility on short notice.

We are currently marketing and selling our processed wood debris at other facilities as boiler fuel, and as a bulking agent for composting operations. We anticipate that much of the processed debris at this facility will also be utilized in these markets and with our existing clients. In the event that stockpiles have reached ultimate capacity (as outlined above in Section 4.0), wood debris with the exception of yard waste will be diverted to the existing landfill cell. Under no circumstances will yard waste be disposed of in the facility waste cells. If such debris cannot be processed for outside markets it will be refused at the facility office/scales.

Any given quantity of processed and/or un-processed wood debris will be removed from the wood debris handling area within 120 days of its arrival on site. In the event that

materials are received on a continuing basis for extended periods of time, stockpiles will be configured such that the oldest material can be efficiently removed from the site in a 'first in-first out' manner.

6.0 Fire and Safety

Fire is an obvious concern at any wood storage location, both from internal combustion and from external ignition sources. The limited allowed storage period of 120 days will significantly reduce the potential risk associated with internal combustion. Further, the limited stockpile quantities will also help prevent such ignition.

The site maintains a 1500-gallon water truck equipped with an external fire hose capable of extinguishing most fires that might occur during routine operations. As a source of water, the facility's potable water system includes a 1,000-gallon water storage tank located adjacent to the office/scalehouse. Additional reserves of water are available from a 2-acre pond located approximately 1200 feet from the wood debris handling area. The site maintains a 3-inch discharge, gasoline powered trash/water pump capable of supplying water from this pond.

In the event of any significant fire, the Eastern Wake Fire and Rescue Department, located in Knightdale, approximately 2.5 miles from the site will be immediately notified. The Solid Waste Section will be notified as soon as practicable, but no more that 24 hours after the discovery of any fire on site.

(End)

