



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

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

November 28, 2011

CERTIFIED MAIL

Return Receipt Requested

7006010000083445608

Mr. Glen Currin

Currin Brothers, Inc.

PO Box 547

Fuquay-Varina, NC 27526

Re: Additional Information Request -
Application for 5-Year Amendment
Currin Brothers LCID Landfill
Wake County, North Carolina
Permit No. 92-N-LCID
Doc ID No. 15668

Dear Mr. Currin:

As stated in the letter by the Solid Waste Section (SWS) written July 20, 2011 to you, please revise the Operations Plan and drawings accordingly. The July 20, 2011 letter and Facility Compliance Audit Report (December 9, 2010) is attached for reference. On your behalf, please have a designated professional engineer (P.E.) respond to the questions and comments according to the July 20, 2011 letter by January 1, 2012, or enforcement action, which may include injunctive action and/or assessment of administrative penalties may be issued.

Please provide a hard copy and full size drawing(s) and also a pdf version on disc.

Thank you for your attention to and cooperation in this matter. If you have questions about this letter please contact either me at 919-707-8258. Also, my e-mail address is Brian.Wootton@ncdenr.gov

Sincerely,

Brian Wootton
Hydrogeologist

cc: John A.K. Tucker, P.E.
Ed Mussler, DWM
Shawn McKee, DWM
Jason Watkins, DWM



North Carolina Department of Environment and Natural Resources

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July 20, 2011

Mr. Glen Currin
Currin Brothers, Inc.
PO Box 547
Fuquay-Varina, NC 27526

Re: Additional Information Request -
Application for 5-Year Amendment
Currin Brothers LCID Landfill
Wake County, North Carolina
Permit No. 92-N-LCID
Doc ID No. 14436

Dear Mr. Currin:

Thank you for submitting the Operations Plan and site drawings/ profile cross-sections that Mr. John A.K. Tucker, P.E. compiled on your behalf, on June 14, 2010 pertaining to the subject permit application; however, an updated/revised Operations Plan is warranted since additional types of operations and stockpiling (i.e. wood grinding, treatment and processing, etc.) occur at this LCID facility.

As requested in the Solid Waste Section's Facility Compliance Audit Report dated December 9, 2010, please respond to conditions 3, 4, 5, 6, 7, and 9, under "Areas of Concern and Comments" segment of this letter (attached). These conditions can be addressed in an updated/revised Operations Plan and revised site drawing(s).

Please also include in the updated/revised Operations Plan, procedures and conditions pertaining to: wood grinding, mining operations, treatment and processing, storage, LCID, timeframes of grinding operations, etc. The updated/revised plan can be written in similar format as the Operations Plan dated September 16, 2010, associated with Currin Brothers LCID No. 1, 32-D in Durham County, NC.

Also, include revised drawing(s) depicting locations of all infrastructure, such as the grinder, locations of current stockpiles of post processing mulch/boiler fuels material, topsoil piles, concrete piles, current elevation contours reflecting current status of property, etc.

Please provide a hard copy and full size drawing(s) and also a pdf version on disc.

Thank you for your attention to and cooperation in this matter. If you have questions about this letter please contact either me at 919-508-8524. Also, my e-mail address is Brian.Wootton@ncdenr.gov

Sincerely,

A handwritten signature in cursive script that reads "Brian Wootton".

Brian Wootton
Hydrogeologist

cc: Ed Mussler, DWM

Jason Watkins, DWM



FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

| UNIT TYPE: | | | | | | | | | | | |
|--------------|--|-----------------------|---|---------------|--|---------------------|--|---------|---|------|--|
| Lined MSWLF | | LCID | X | YW | | Transfer | | Compost | | SLAS | COUNTY: Wake PERMIT NO.: 92-N FILE TYPE: COMPLIANCE |
| Closed MSWLF | | HHW | | White goods | | Incin | | T&P | X | FIRM | |
| CDFL | | Tire T&P / Collection | | Tire Monofill | | Industrial Landfill | | DEMO | | SDF | |

Date of Audit: December 9, 2010

Date of Last Audit: April 6, 2010

FACILITY NAME AND ADDRESS:

Currin Brothers Landfill
 4525 Sunset Lake Road
 Apex, NC 27539

GPS COORDINATES: N: 35.68388 E: -78.81522

FACILITY CONTACT NAME AND PHONE NUMBER:

Glenn Currin (919) 876-1138, (919) 880-6624 (cell)

FACILITY CONTACT ADDRESS:

Currin Brothers Landfill
 PO Box 547
 Fuquay-Varina, NC 27526

AUDIT PARTICIPANTS:

Jason Watkins, NCDENR – Solid Waste
 Zinith Barbee, NCDENR – Solid Waste
 Allen Currin, owner
 Kenneth Richardson

STATUS OF PERMIT:

81-002 Demolition-Landscape Landfill issued by Wake County on August 4, 1981
 86-001 LCID landfill issued by Wake County on June 18, 1996 (references DEHNR permit 92S)
 86-001 PTC Phases 1-3 modifications issued by Wake County on December 23, 2003
 Permit renewal application submitted to the Solid Waste Section and is under review

PURPOSE OF AUDIT:

Comprehensive Audit

NOTICE OF VIOLATION(S):

None

You are hereby advised that, pursuant to N.C.G.S. 130A-22, an administrative penalty of up to \$15,000 per day may be assessed for each violation of the Solid Waste Statute or Regulations. For the violation(s) noted here, you may be subject to enforcement actions including penalties, injunction from operation of a solid waste management facility or a solid waste collection service and any such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules.

FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

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STATUS OF PAST NOTED VIOLATIONS:

None

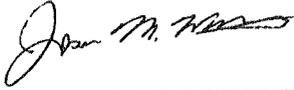
AREAS OF CONCERN AND COMMENTS:

1. Site inspection was conducted by Jason Watkins and Zinith Barbee to determine compliance with NC Solid Waste Rules and to assist with permit renewal review.
2. The facility is permitted to receive land clearing waste, yard trash, untreated and unpainted wood, and inert debris.
3. Upon issuance of permit renewal, the facility should upgrade its signage to indicate the facility permit number and contact information for normal operations and emergencies.
4. The facility is currently not operating as a landfill but rather a treatment and processing facility. Additionally, as operations permit, some of the existing landfill areas are be mined out and processed for topsoil, mulch, etc. Wood waste enters the facility and is taken to a sorting area. Material that can be ground is separated and ground into boiler fuel and/or mulch. Any soils or residuals left after the sorting operation is placed into stockpiles that are left for a period of up to 2 years to allow for the breakdown into topsoil material.
5. Based on the current operations at the facility, the following should be submitted so the permit renewal can move forward:
 - a. The volume(s) and acreage(s) requested by Zinith Barbee on 11/4 and 11/23.
 - b. A map (overview) and operations plan depicting the current state of operations at the Currin LF site. The map submitted with the permit review indicates build out of the landfill and currently little to no landfilling is occurring, rather the treatment and processing of land clearing and inert debris. As such the elevations, etc on the submitted map do not reflect accurately the state of the property. The map should include at a minimum the location of all infrastructure such as the grinder, as well as locations of the current stockpiles of post processing mulch/boiler fuels material, topsoil piles, etc. The update to the operations plan should include language that details how the site accepts and processes all material, including the stockpiling of concrete waste on the closed portion of the landfill for future grinding (with timeframes of grinding dates).
6. The existing landfill areas, especially perimeter slopes and areas should be maintained free of trees and other woody vegetation so that inspections by both facility and Section staff can occur. Edge of landfill markers should be put in place and maintained so that required buffers are visible upon inspection.
7. Perimeter slopes of the landfill should be maintained at a slope no greater than 3:1 with adequate soil and vegetative (grass) cover.
8. As noted in the April 6, 2010 audit report, the facility is required to monitor landfill gas in on-site structures and at the property boundaries, therefore a gas monitoring plan is needed. To date, no such plan has been submitted. Please contact Zinith (919) 508-8401 or Ed Mussler (919) 508-8495 as soon as practical to determine the requirements for this plan.
9. Concrete is being stockpiled on top of the inactive Phase 2 portion of the landfill until a grinder can be purchased or brought in to process. There was a pile of rebar and other metal material in close proximity to the concrete that could have come from the previous processing of concrete material. This material should be kept in a covered container rather than on the ground and hauled off site when the contained is full.

FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

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Please contact me if you have any questions or concerns regarding this audit report.



Jason M. Watkins
Central District Supervisor
Regional Representative

Phone: 336-771-5092

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|-----------------------------------|--|---------------|-------------------------------------|---------|--|-------------------|
| Delivered on : <u>12-16-10</u> by | | Hand delivery | <input checked="" type="checkbox"/> | US Mail | | Certified No. [] |
|-----------------------------------|--|---------------|-------------------------------------|---------|--|-------------------|

Cc (via email): Mark Poindexter, Field Operations Branch Head
Donald Herndon, Compliance Officer
Zinith Barbee, Hydrogeologist
Ed Mussler, Permitting Branch Head