



## North Carolina Department of Environment and Natural Resources

### Division of Waste Management

Beverly Eaves Perdue  
Governor

Dexter R. Matthews  
Director

Dee Freeman  
Secretary

June 2, 2010

Mr. J.V. Potter  
Operations Services Director  
336 Landfill Road  
Boone, North Carolina 28607

Subject: Completeness & Technical Review Letter  
Watauga County Transfer Facility  
Watauga County, Permit # 95-03, Document ID No. 10711

Mr. Potter:

The Division of Waste Management, Solid Waste Section (Section) has completed the technical review of the Operation Plan (DIN9934) submitted in support of the five-year renewal of the Permit to Operate. The document was submitted on your behalf by Ms. Donna Watson and was received in the Asheville Regional Office on March 4, 2010.

The submittal has been reviewed for completeness in accordance with General Statute 130A-295.8(e). A determination of completeness means that the application includes all required components but does not mean that the required components provide all of the information that is required for the Section to make a decision on the application. The permitting activity fee in addition to the components required by 15A NCAC 13B.0401 have been submitted so the application is deemed complete.

It has been determined the Section requires clarification or additional information in order to approve the Operation Plan. Please revise the Plan to provide a response for each of the following items:

1. Section 4.3 needs to include a discussion of proposed mobile home and thermostat (mercury switch) recycling processes. The thermostat discussion should cover all State and Federal guidelines for management of "Universal Waste Mercury Containing Equipment". The guidelines can be found using the following links:
  - a. <http://www.wastenotnc.org/hwhome/guidance/pdf/UNIVERS.pdf> ;
  - b. <http://www.epa.gov/osw/hazard/wastetypes/universal/mce.htm> ;
  - c. <http://www.epa.gov/mercury/spills/#whatnever> .
2. The Section 4.4, New Transfer Facility list of materials not accepted at the facility should include all items expressly prohibited from disposal by N.C.G.S. 130A-309.10(f).
3. Section 4.4, New Transfer Facility states the *goal of the County is to remove all waste from the tipping floor at the end of the day* (pg. 13). A standard permit condition will prohibit storage of waste on the tipping floor after operating hours.

4. Section 4.10.2, Gas Monitoring should be updated to include a discussion of the operation of the Landfill Gas to Energy (LFGTE) equipment. In addition, the discussion should include contingency plans for failures or emergencies of either the blower or LFGTE systems.
5. Section 4.11, Animal Shelter states *carcasses are buried on site in a designated area*. This designated area must be indicated on the Overall Site Layout Map.
6. Section 4.12, Convenience Center states *plastics (#1 and #2) are collected*. As a reminder, N.C.G.S. 130A-309.10(f) prohibits disposal of all recyclable rigid plastic containers.
7. The last eight pages of the Operation Plan include title pages for eight separate Appendices. However, none of the items indicated on the title pages are actually contained in the Plan. Please add copies of each item to the Operation Plan as indicated.

In addition to the Operation Plan revisions, the following conditions must be met in order to receive a solid waste Permit:

1. Complete an Environmental Compliance Review according to NCGS 130A-295.3

Ms. Shawn McKee, Compliance Officer, will be contacting you, under separate cover, regarding any further information that may be needed to satisfy these two requirements.

If you should have any questions regarding this matter please contact me at (828) 296-4703, or by email at [allen.gaither@ncdenr.gov](mailto:allen.gaither@ncdenr.gov).

Sincerely,



Allen Gaither  
Environmental Engineer

Cc: Donna Watson – Watauga County  
John Patrone – SWS/WSRO  
Shawn McKee – SWS/RCO