

Permit No.	Date	Document ID No.
P1209	June 29, 2010	10971



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North Carolina Department of Health and Human Services
Division of Public Health • Epidemiology Section
Occupational and Environmental Epidemiology Branch
1912 Mail Service Center • Raleigh, North Carolina 27699-1912
Tel 919-707-5950 • Fax 919-870-4808

Beverly Eaves Perdue, Governor
Lanier M. Cansler, Secretary

Jeffrey P. Engel, M.D.
State Health Director

June 24, 2010

VIA FACSIMILE & US MAIL
(336-668-3868)

Mr. Chris Hay, E.I.
Environmental Group Manager
Kleinfelder
313 Gallimore Dairy Road
Greensboro, NC 27409

Subject: Review of Revised Operations Manual
Abbey Green Recycling Center
5030 Overdale Road
Winston-Salem, NC

Dear Mr. Hay:

In response to your request, we have reviewed the Proposed Operations Manual (Manual) for the Abbey Green Recycling Center located in Winston-Salem, NC. The Manual includes many of the items noted in the Health Hazards Control Unit's (HHCU) 2008 Guidelines for Handling Asbestos-Containing Building Materials at C & D Recycling Centers in North Carolina (Guidelines).

Before we can finalize our response, you will need to address each of our comments below and make the necessary revisions to your Manual. After you have made the necessary changes, please submit a copy of your revised Manual for our review.

- 1) Please add a statement in Section 1.1 Overview (General Facility Operations) clarifying what materials the facility plans to accept—i.e., C & D materials only, new construction debris only, or both. This information is not currently found until Section 2 Debris Handling Operations.
- 2) Section 1.5 Signage – Please include a sample of the sign to be posted that list acceptable wastes. The list of acceptable materials should include **unused** drywall, **clean** lumber, **clean** metal, **clean** concrete, **clean** piping, **clean** ductwork, and **new** three-tab single-ply post-consumer roofing shingles.



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- 3) In Section 1.6, you list "Operators" and "Attendants" as two of the personnel categories. In Section 1.10 Litter Control, you state that "Facility operators" will inspect materials entering the facility. In Section 2.4 Debris Screening Program, you state "attendants" are trained to identify unacceptable wastes—including asbestos. Are the "operators" and "attendants" the same people? Will both groups be trained? Please clarify.
- 4) Section 1.7 Health and Safety – All personnel should have at least two-hour asbestos awareness training.
- 5) Section 1.9 Utilities – Water should be available throughout the site in the event that asbestos-containing materials are identified.
- 6) Section 1.13 Record Keeping Program – Add an item for reports of any asbestos testing of suspect materials to include sampling data, analytical results and disposition of the load.
- 7) Section 2.2 Acceptable Debris – The list should include **unused** drywall, **clean** lumber, **clean** metal, **clean** concrete, **clean** piping, **clean** ductwork, and **new** three-tab single-ply post-consumer roofing shingles.
- 8) Section 2.3 Prohibited Wastes – Please add a statement that asbestos-containing materials of any kind, including but not limited to, flat-built-up roofing, flashing, mastic coated shingles or cement shingles, are not acceptable. Suspect materials found to contain greater than 1% asbestos are not acceptable.
- 9) Section 2.4 Debris Screening Program –
 - (a) See Item 3 above for questions about "attendants" versus "operators".
 - (b) Paragraph 4 – Most asbestos inspections are conducted prior to beginning demolition or renovation work. Is this the information that will accompany the load or will someone be sampling the materials as they are loaded into the truck to bring to the recycling center?
 - (c) Will the facility have an accredited inspector and an abatement contractor on call should a suspect load be received?
 - (d) Please add that if a suspect load is received and the staging area or pick line contaminated, all work will stop and the Health Hazards Control Unit will be notified.
- 10) Section 2.6.1 – There is no mention in the General Procedures about inspecting each load for suspect asbestos-containing materials.
- 11) Section 2.6.4 Markets – Will asphalt shingles be ground by Abbey Green or will they be transported to a shingle recycling facility for grinding?

Exposure to asbestos-containing materials can cause serious health effects. It is our hope that by prohibiting these materials from entering the waste streams at the proposed facility, such exposure to employees, downstream recyclers, the general public who use the recycled products, and to the environment can be eliminated.

The Health Hazards Control Unit very much appreciates the opportunity to be a part of the permit review process for this facility. After you have made the necessary changes, please submit a copy of the revised Operations Manual for our review.

Mr. Hay
June 24, 2010
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If you have questions about the information enclosed, please contact me at 919-707-5971.

Sincerely,



Patricia A. Wylie
Industrial Hygiene Consultant
Health Hazards Control Unit

cc: ✓ L. Frost, NCDENR-DWM
R. Gremmell, Forsyth County Environmental Affairs Dept.
M. Giguere, HHCU
J. Dellinger, HHCU

