

Chao, Ming-tai

Permit No.	Date	Document ID No.
26-FH	October 31, 2012	17531

From: Chao, Ming-tai
Sent: Wednesday, October 31, 2012 10:42 AM
To: 'Karen Hall'
Cc: Shackelford, Dennis; Hammonds, Andrew
Subject: Comment on HHW Plans, Cumberland County, 26-FH
Attachments: HHWeventApplication_26FH_Cumberland.doc

Issued via an e-mail
Date: **October 31, 2012**
Solid Waste Section
Raleigh Central Office

Dear Ms. Hall:

I have conducted a review of the Permit Amendment Application for a 5-year review (Doc ID 17471) for Cumberland County Permanent Household Hazardous Waste (HHW) Collection Facility, Permit No. 26-FH. The Permit Application includes the Operational, Contingency, and Closure Plans and Appendices. Based on the review, I have some comments on the Permit Application which are stated below:

1. The year 2011 Facility Annual Report indicated that the following companies had involved disposal and recycling activities at this facility:
Disposer: Clean Harbors, VA and USAG, NC;
Recycler: Winston Watts, SC; P&W Oil Service, NC, Filter Specialty, NC, Piedmont Biofuels, NC; and Fayetteville Waste Oil, NC.

However, according to the Service Agreement between the County and Tradebe Treatment and Recycling, LLC (in the Figure 3 – Current Contract of the Permit Application which will expire June 30, 2015), Tradebe Treatment and Recycling, LLC is current Contractor for bulking, over-packing, transporting and disposal/recycling of the collected HHW. Please complete the attached HHW Collection Facility Application Form (only applicable to the hazardous wastes, not for recyclable) by providing all applicable information, and the completed form will be a portion of the Permit Application. Refer Comment No. 4 for the Generator Identification Number. Since the Contractors involved the activities may be changed from time to time within the permit renewal cycle, please constantly update contactor(s) information on the form which shall be retained in the operating record.

2. (Screening and Collection of Wastes) The third paragraph of this Section indicates that this HHW Collection Facility is also collecting “**yard and garden products.**” If the HHW Collection Facility is collecting yard wastes as defined in the NC Solid Waste Management Rule 15A NCAC 13B .0101(56), the Permit Application must provide the following information in the Permit Application:
 - i. The brief description of collection/storage area (shown the location on the existing facility plan map – Figure 1) such as structure, size/dimension, physical features, etc.
 - ii. The description of waste screening and segregation (sign, label, marking, tagging) approaches.
 - iii. The maximum weight (in tonnage) or volume (in cubic yard) allows being stored at any time at the facility.
 - iv. Fire prevention (isle spacing, access requirement and communication and firefighting equipment).
 - v. The tonnage per month per recyclable waste stream measured by scales needs to be documented in the operating record and annual report.
 - vi. The best management practices to prevent wastes at each unit from contact surface water.

- vii. The contact information of a contractor or recycler to handle off-site transportation and the frequency or schedule to remove the waste off-site.
3. (Waste Identification and Package) In additional to the label shown in Figure 7, the words “Used Oil” must be clearly placed on the containers. Please add the requirement to the Section.
4. (Waste Identification and Package, 2nd paragraph, on Page 9) The Solid Waste Section (NC SWS) record indicates that the Cumberland County Household Hazardous Waste Collection Facility has not received a HHW Generator Identification Number; therefore, the NC SWS issues the NC (HHW) Generator Identification Number (ID) - **NCPH0269201** to the above-mentioned facility. This unique ID number that will be a Permit Condition in the Permit To Operate (PTO) shall be used to ship wastes off site for recycling, treatment, and/or disposal after the new PTO is issued. Please add this Generator Identification Number to this Section.
5. (Accumulation Time) The current PTO for the facility allows the maximum period of accumulation for all HHW stored at the facility no more than 180 days after initial receipt which concurs with the guidance document – “HHW Technical Resource Guide.” Therefore, the NC SWS can’t approve the proposed new accumulation period of one year. Please revise the waste accumulation period to 180 days in this Section.
6. (Use and Management of Containers) The inspection activities are mentioned in this Section. If the inspection logs (Figures 8 or 9) are the ones to be used while the inspection is conducted, please add the reference to the Section; otherwise please provide a typical example of the inspection form to this Permit Application.
7. (Contingency Plan) Please address the following concerns:
 - i. (Purpose and Implementation, on Page 14) The County may need to forward the copy of the Operational and Contingency Plans and the facility PTO to the Cumberland County Department of Emergency Services, the local fire department, county sheriff, and local hospital, and other appropriate emergency agencies. Please add the requirement to this Section.
 - ii. (Spill Response Equipment and Procedures, on Page 15) Please verify and confirm the contact information and/or the title of the “North Carolina Emergency Response Center” which can’t be found by the web search engines; however, there are several related ones: the North Carolina Emergency Response Commission, the North Carolina Emergency Operations Center or the Cumberland County Department of Emergency Services. Should the spill or emergency occur the County may want to use the County’s Hazmat team to control, handle, and disposal of the spillage?
 - iii. (Incident Procedures, Bullet Item 10, on Page 15) Please identify the “appropriate authorities.” For example: the NC SWS’s Solid Waste Environmental Specialist(s), representatives from the County’s Department of Emergency Services, the county sheriff, the fire marshal, and/or etc.
 - iv. (Incident Procedures, Bullet Item 11, on Page 15) The correct name of the agency is Division of Waste Management. Please correct the typo.

- v. (Incident Procedures, Bullet Item 11, on Page 15) Please describe the content of the Incident Report. The Current PTO has listed the minimum report requirements include:
 - a) Name, address, and telephone number of the facility operator,
 - b) Date, time, and type of incident (e.g. fire, explosion, spill),
 - c) Name and quantity of each type of HHW involved,
 - d) The extent of injuries and property damages, if any,
 - e) An assessment of actual or potential hazardous to human health or the environment where this is applicable,
 - f) Estimated quantity and disposition of recovered HHW resulted from the incident, and
 - g) Measures and actions will be immediately taken to avoid or prevent repeating a similar incident again in the future.

Please include the above-referenced info, but not limited to, to the Section.

- vi. (Evacuation Plans, Bullet item 2, on Page 16) Please define/identify the “Emergency Management.”
 - vii. The Contingency Plan may need to describe the procedures while non-project related disasters or incidences occur, such as: the procedures to temporarily shut down the site and to reopen later for operation when a nature disaster (tornado, hurricane, flood, power outage, or bomb threats, etc.) is either unanticipated or forecasted at areas that the facility is located.
8. (Closure Plan) Please provide a time frame of notification of closure the facility – for examples, 30 days prior to starting the planned closure activities, the County will inform the Solid Waste Section a written notification of site closure. In the notification, the County will provide the detail schedule associated with each closure activity including the date of informing the Solid Waste Section in writing in order that a site inspection may be made by the representative to determine compliance with closure procedures described in the Closure Plan.
9. (Figure 2, Deed) Please provide the confirmed acreage of the property. The number of acreage (50.37 acres?) in the property deed is illegible.

Please feel free to contact me if you have any questions of the above-mentioned comments.

Best regards,

Ming-Tai Chao, P.E.
Environmental Engineer
Permitting Branch, Solid Waste Section
Division of Waste Management
(Mailing Address)

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From: Karen Hall [mailto:khall@co.cumberland.nc.us]
Sent: Wednesday, October 17, 2012 4:01 PM
To: Chao, Ming-tai
Subject: RE: HHW Plans

Good Afternoon,

Received and reviewed the permit application. Everything was correct.

Thanks & enjoy your evening!

Karen Hall

Administrative Program Officer
Cumberland County Solid Waste Management
910-321-6929 (telephone)
910-308-6380 (cell)
910-321-6840 (fax)

From: Chao, Ming-tai [mailto:ming.chao@ncdenr.gov]
Sent: Wednesday, October 17, 2012 3:53 PM
To: Karen Hall
Cc: Patterson, Elizabeth; Mussler, Ed; Gaither, Allen
Subject: RE: HHW Plans

Dear Ms. Hall:

I received the permit application and placed in the DWM tracking system with a Doc ID 17471 today. To ensure that DWM database has the current info of this facility, please review the attached "Permit Application Review Form" to see if any info needs to be revised/updated. If everything is correct in the form please don't send back to me. The fee for reviewing the permit application is \$1,250.00 which will bill to the County shortly. Please feel free to contact me if you have any questions of the permitting processes. Thank you and have a wonderful day.

Ming-Tai Chao, P.E.
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From: Karen Hall [<mailto:khall@co.cumberland.nc.us>]

Sent: Wednesday, October 17, 2012 2:20 PM

To: Chao, Ming-tai

Subject: HHW Plans

Hi Ming,

Attached is the HHW Operational, Contingency & Closure Plan for Cumberland County. I will be mailing a hard copy. It's my understanding that we'll receive an invoice from NCDENR for the fee. Our finance dept needs that to cut the check.

If you need any information or have questions about something in the plan please contact me.

Thanks,

Karen Hall

Administrative Program Officer

Cumberland County Solid Waste Management

910-321-6929 (telephone)

910-308-6380 (cell)

910-321-6840 (fax)

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