



North Carolina Department of Environment and Natural Resources

Division of Waste Management

Dexter R. Matthews  
Director

Beverly Eaves Perdue  
Governor

Dee Freeman  
Secretary

**SOLID WASTE SECTION**

November 09, 2012

Mr. Jerry Blanchard, Director  
Harnett County General Services  
P. O. Box 940  
Lillington, NC 27546

Subject: Comments on Permit Amendment Application – 5-year Permit Review  
Dunn/Erwin Solid Waste Transfer Facility  
Harnett County, North Carolina  
Permit No. 43-07T, Document ID No. (Doc ID) 17610

Dear Mr. Blanchard:

The Division of Waste Management (DWM), Solid Waste Section (SWS) received the following documents:

- “*Dunn-Erwin Landfill, Corrective Action Projects: Project 1 – Sanitary Sewer Pump Station, Force Main, & Groundwater Extraction System; Project 2 – Convenience Center and Transfer Station Improvements. Project Manual,*” dated September 2012 and prepared Clayton, Sr., P.E., Inc. The document (Doc ID 17302) was received by the SWS on September 25, 2012.
- “*Dunn-Erwin Landfill, Transfer Station Permit Renewal Application, Permit 43-07T,*” (Permit Application) dated November 02, 2012 and prepared Clayton, Sr., P.E., Inc. The document (Doc ID 17585) was received by the SWS on November 02, 2012.

After conducting a review, the SWS has comments on the Permit Application and stated below:

General

1. Please complete and sign the attached Application Signature page.

Section 3.0

2. (Section A) The Permit Application proposes that the facility receives approximately 105 tons per day. However, the Facility Compliance Audit Report dated January 20, 2011 indicated the facility receives approximately 145 tons per day. Please confirm the daily waste rate to be handled at this facility.
3. (Sections D & E) The described notifications and/or reports shall be sent to the new address below:

1646 Mail Service Center, Raleigh, North Carolina 27699-1646  
Phone: 919-707-8200\ Internet: <http://portal.ncdenr.org/web/wm/sw>

Department of Environment and Natural Resources  
Division of Waste Management, Solid Waste Section  
1646 Mail Service Center  
Raleigh, NC 27699-1646  
(919)707-8200

Please make a necessary correction.

4. (Section D) Please address the following concerns of waste screening or segregation:
  - i. Have wastes been sorted and segregated in the convenience centers prior to shipping to the transfer facility? Please clarify.
  - ii. Will the waste sorting and segregating (including removal of recyclable material out of waste stream) be conducted at the transfer facility? If so, please describe the waste sorting and separating processes in this Section.
  - iii. Since asbestos waste or asbestos containing material (ACM) are not listed as prohibited wastes in the Operations Plan. If the facility conducts sorting or segregating wastes in the facility, the personnel will potentially be exposed to asbestos; therefore, the County must submit a work plan to the Health Hazards Control Unit of the Division of Public Health, Department of Health & Human Services for a review and approval. For preparing the work plan, please contact Mr. Jeff Dellinger, at phone 919-707-5950, or [jeff.dellinger@ncmail.net](mailto:jeff.dellinger@ncmail.net) for the details and requirements. If the above-mentioned condition is applicable to the facility, please add the requirement to this Section. A copy of correspondence/approval document issued by the Health Hazards Control Unit of the Division of Public Health needs to append to the Permit Application.
  - iv. Should the recyclable material that are retrieved from the wastes stream be conducted at the facility, please describe how the recyclable is managed, such as the type and maximum amount- either cubic yards or tonnage that are allowed to be stored on-site, the locations of on-site storage areas, the contact info of the contractors who transport, treat, and or process the recyclable. Please be advised that Waste and recyclable shall not be stored on the tipping floor after the operating hours. If the collected recyclable must be temporary stored on the tipping floor or other areas at the transfer facility, the maximum duration for storage shall not be more than 48 hours.
  - v. This Section needs to provide the clear time frame (said 24 hours) for reporting any attempted delivery of wastes of which the facility is not permitted to receive.
5. (Section E) Please address the following concerns:
  - i. The Facility Compliance Audit Report dated January 20, 2011 indicated that wash-down liquid waste/leachate will be pumped, hauled, and treated at the City of Lillington's WWTP. If the facility will continue this practice please add the specific information to this Section.
  - ii. Please describe the pump & haul practice at the facility being approved by the NC DWQ on August 24, 2010 and add the copy of the approval document to the Section 9.0- Appendix Documents.

- iii. It is necessary to describe the constructed measures and structures on the tipping floor (such as berms and sloped floor to drains) to prevent wash-down liquid from leaving the building and to facilitate wash-down liquid draining into sumps (drainage receptors).
  - iv. Please describe the conditions of the loading bay, apron, and/or tipping floor which will properly function to prevent or limit any leachate and wash-down liquid from penetrating into the soil underneath the building floor.
6. (Section F) Please address the following concerns associated with Fire Control and Prevention:
- i. Please provide the protocols and measures (such as piles of earthen material stockpiled adjacent to the building) to handle/manage incoming hot/burning loads under various scenarios – prior to entering the facility, prior to unloading wastes on tipping floor, and after unloaded to the tipping floor.
  - ii. Is a fire extinguisher placed on equipment that is described in Section H? Please clarify.
  - iii. Have the equipment operators been trained to know how to use firefighting tools / equipment? Please clarify.
  - iv. Please add that open burning is prohibited at the transfer facility.
  - v. Please append the fire notification form to the Permit Application. The DWM “Solid Waste Management Facility Fire Occurrence Notification” form can be used if the County pleases. The form can be found and downloaded from the DWM web site at [http://portal.ncdenr.org/c/document\\_library/get\\_file?uuid=18760b57-0f71-464e-b89f-cf4790caa65f&groupId=38361](http://portal.ncdenr.org/c/document_library/get_file?uuid=18760b57-0f71-464e-b89f-cf4790caa65f&groupId=38361).
7. (Section G) According to the “*Project Manual*” for the transfer station improvement project, the new drainage receptors will be installed on the east and west sides of the building to convey wash-down liquid to the new holding tanks. The drainage receptors must be inspected at the end of each working day to ensure that wash-down wastes piled on top of the bar screens will be removed and properly disposed of. Please add the requirement to the Section.
8. (Section I) Please provide the measures to control windblown litters for the loaded truck in and out of the facility such as using a tarp over the wastes while in transportation.
9. (Section K) The approved permit application including the Operations Plan and all completed documents related to operation including, but not limited to, random waste screening / inspection forms, non-conforming waste form, fire notifications, etc. must be placed in the operating record at the facility. Please add the requirements to this Section.
10. (Section L) Please address the following concerns:
- i. Will all waste loads be subjected to screening at the tipping floor? Or, the waste screening is conducted randomly. If random waste screening is conducted at this facility please provide the screening frequency and random sampling protocol in the Section. In the course of screening/inspection, the wastes must be unloaded at an area isolate from other incoming waste loads so that any cross contamination will not occur at the tipping floor.

- ii. Please provide a copy of the typical waste screening form to the Permit Application.
  - iii. According to the Facility Compliance Audit Report dated January 20, 2011, waste screening or sorting activities are conducting at tipping floor. Recyclable (tires, batteries, plastic bottles, etc.) shall not be stored or stockpiled on the tipping floor after the operating hours. Please properly address the concerns (also refer Comment No. 4).
  - iv. Unacceptable wastes that are potentially hazardous or PCB wastes and left on the tipping floor can't be loaded back to the truck and must be properly isolated and separated from other incoming wastes and on-site personnel. The wastes must be contained and confined prior to properly disposal off by personnel or contractor who pertains properly training, knowledge, credential, and machine, equipment & tool. It is recommended that the Section N - Contingency Plan address approaches, protocols and reporting requirements to properly manage and handle the above-mentioned unacceptable wastes in detail.
11. (Section N) An alternative MSWLF must be identified in the Section if the designated disposal facility – WI-Sampson County Disposal Inc. (Solid Waste Permit No. 82-02) is temporary closed down for a reason. The alternative MSWLF will allow to receive the waste streams for disposal because its approved service areas allow such disposal,
12. (Section M) Please address the following concerns:
- i. The employees that have completed operator's training courses will also have to review the approved Operations Plan in order to maintain the facility in compliance with all applicable requirements.
  - ii. Change "Division of Solid Waste Management" to "Division of Waste Management."
13. Please describe the dust control measures in the Operations Plan.
14. Please describe the routine inspections conducted at the facility. In a minimum the Section needs to discuss:
- i. The personnel conducts routine inspection – training and credential;
  - ii. The inspection frequency;
  - iii. The inspection items listed and follow-up actions on the nonconformance items;
  - iv. The retention of inspection records.
  - v. Provide a typical copy of the inspection form appended to the Permit Application.

Please timely respond the above-referenced comments and submit the SWS a revised Permit Application (one hard copy and an electronic copy), which incorporates the requested information. If you have questions about the comments and permitting processes, please contact please contact me at (919) 707-8251 or [ming.chao@ncdenr.gov](mailto:ming.chao@ncdenr.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Ming-Tai Chao', written in a cursive style.

Ming-Tai Chao, P.E.  
Environmental Engineer  
Solid Waste Section

Enclosure - Application Signature Page

Cc:

C. Tyrus Clayton, Jr., P.E.  
Ed Mussler, Permitting Branch Supervisor  
Robert Hearn, DWM

Amanda L. Bader, P.E., LEED  
Dennis Shackelford, DWM  
Central Files