



SOUTH ATLANTIC AREA

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August 30, 2013

Permit No.	Date	DIN
11-04T	September 3, 2013	19532

Allen Gaither
Solid Waste Branch Head
NC DENR – Division of Waste Management
Solid Waste Section
2090 US Highway 70r
Swannanoa, NC 28778

RECEIVED VIA EMAIL
August 30, 2013
Solid Waste Section
Asheville Regional Office

Re: Response to Comments, Determination of Completeness
Waste Management – Asheville Transfer Station
Permit Number 1104-Transfer-1993

Dear Mr. Gaither:

The Waste Management of the Carolinas - Asheville Transfer Station located in Asheville, North Carolina, is currently operating under the Municipal Solid Waste Transfer Facility permit 1104-Transfer-1993. The permit expires on December 31, 2013. In accordance with North Carolina Administrative Code 15A NCAC 13B, the facility submitted a renewal application of the current permit. On July 16, 2013, the Solid Waste Section returned a Determination of Completeness letter (Gaither to McRee) with four comments. Please find the attached revised and updated Operations Plan for the facility and responses to each comment below.

1. The facility understands the restrictions of the individual landfill's service areas. The facility will not transfer waste from a county to a North Carolina facility that is unauthorized to service the area.
2. The Operations Plan was revised and the statement was removed.
3. The Operations Plan was revised and the procedure for dealing with unauthorized waste is included on Page 3.
4. The final version of the plan referenced was submitted to the Solid Waste Section on November 7, 2012. The plan has been revised and is included as part of this submittal.

If you have any questions concerning this submittal or if additional information is needed, please contact me at (704) 853-7862 or at jmccree@wm.com.

Sincerely,
Waste Management – Asheville Transfer Station

A handwritten signature in blue ink, appearing to read "JM", is placed over a light yellow rectangular background.

Jason McRee
Environmental Protection Manager

cc: Mike Nicholson, District Manager

Attachment



WASTE TRANSFER STATION

OPERATIONS PLAN

WASTE MANAGEMENT OF ASHEVILLE 24 POND ROAD

ASHEVILLE, NORTH CAROLINA

2013

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1.0 FACILITY LOCATION AND DESCRIPTION

The Waste Management of Carolinas, Inc. – Asheville Transfer Station (Asheville Transfer Station) is located at 24 Pond Road, approximately .25 miles east of U.S. Highway 26 (Figure 1). The transfer station may serve all Counties located in North Carolina.

The facility includes approximately 4.8 acres of land which is encompassed by a perimeter fence. Existing buildings at the site include an office building, warehouse, materials recovery facility, and a maintenance shop. The site location plan provides the facility layout (Figure 2).

The transfer station will accept municipal waste from residential, commercial, medical, and industrial sources. The facility may handle on average up to 800 tons per day. No sludges, special waste, or hazardous waste will be accepted for disposal at the transfer station. Municipal waste will be consolidated at the transfer station for transport to and disposal at a permitted sanitary landfill. Regulated Medical Waste will be collected and stored on site prior to transfer. The municipal waste will be transported to the Palmetto Sanitary Landfill and Recycling Center (SC Solid Waste Permit# 422401-1101) in Spartanburg, South Carolina; Chamber's R&B Landfill (GA MSWL Permit # 006-009D) in Homer, Georgia; Iris Glen Environmental Center (TN Solid Waste Permit# SNL 901040262) in Johnson City, TN; Buncombe County Landfill (NC Permit# 1107-MSWLF-1996) in Alexander, North Carolina; or Haywood County - White Oak Landfill (NC Permit# 4407-MSWLF-1993) in Waynesville, North Carolina. Regulated Medical Waste will be transported to the Waste Management – Healthcare Solutions facility (GA Solid Waste Handling Permit# 028-042P(BIO)) in Woodstock, Georgia.

Water and sewer service is provided by the local utilities. The sewer connection is directly into the sewer on-site. All process water, leachate or contaminated stormwater is collected in floor drains at the front bay entrance or the loading bay entrances. The process water flows through an oil water separator prior to discharge to the sewer system. No storage other than the collection system and the separator is available at the facility.

Stormwater is routed around the facility and away from transfer station bay doors to prevent contamination. The water flows via the conveyance system to an exterior conveyance ditch prior to discharge.

Signs at the entrance of the site note “Municipal Solid Waste Only. No Hazardous Wastes Accepted. Non-hazardous special wastes (drums, sludges, liquids, etc.) will be refused or returned at the haulers' expense.” The sign will also state hours of operation, permit number, and emergency contact numbers.

2.0 HOURS OF OPERATION

The transfer station will operate 10-12 hours per day, 5.5 days a week. The actual hours of operation will vary; however, it is anticipated that the transfer station will be operated an average of 50-60 hours per week. Trained transfer station personnel are on-site during these periods. The hours stated are for the receipt of waste; other activities pertaining to the transfer station including handling and loading of waste may be conducted beyond these hours.

3.0 EQUIPMENT

Collection vehicles, transfer vehicles, transfer trailers, containers, and bucket loaders will be utilized at the facility for loading, hauling, and managing solid waste.

Collection vehicles, consisting of front load, rear load, roll-off trucks, and/or trailers will transport all waste to the transfer facility.

Refuse will be consolidated on a tipping floor where it will be pushed into open top trailers.

Transfer vehicles will typically consist of a tractor and 53' aluminum body walking floor or tipper type trailer. Transfer trailers will be tarped for over-the-road transport. The loading of waste and transfer trucking operation may be contracted out to a third-party contractor.

A bucket loader will be used to load the trucks and tamp down waste. Trailers will be loaded and weighed to ensure that legal load limits are not exceeded.

4.0 OPERATIONAL PROCEDURES

A trained and certified operator will always be present at the transfer station during operating hours overseeing the loading and unloading of waste. The operator will be responsible for directing all traffic into and out of the transfer station. The operator will also be responsible for the movement of waste from the tipping floor into the trailers. In addition to a State approved certified operator training, the operators will be provided training regarding unauthorized waste.

The operator is responsible for the operations, maintenance, and general housekeeping of the facility. All extraneous solid waste will be swept and removed by broom and/or shovel during the operational day. The floor will be washed down at the end of each day of operation. Wash

water will be collected in floor drain and routed to the sanitary sewer as described above. Litter and waste will be removed from floor drains daily and piping will be flushed as needed. The operator will ensure that wind-blown debris is picked up daily.

Municipal Solid Wastes are to be accepted at the transfer station. Random inspections will be conducted to ensure unacceptable waste is not delivered to the facility. Random inspections will be performed and documented on front-end loaders, commercial rear-end loaders and roll-offs. There will be no less than four (4) random inspections conducted monthly. The drivers/vehicles will be randomly inspected and not inspected consecutively. Loads that fail to meet the municipal solid waste requirements will be rejected, documented and reported in accordance with Waste Management procedures. Unauthorized waste that is identified through normal operations will be reloaded on the vehicle that delivered the material. If the material is of a size that it cannot be reloaded or if the material is identified after the collection vehicle has left the facility, the material will be segregated and staged until it can be removed and disposed of properly. Small items, such as but not limited to scrap tires or electronics, will be staged in a container outside of the transfer station and emptied as necessary.

Recovered, reclaimed, or recycled material including but not limited to cardboard, metal, plastics, etc., may be separated and removed from the waste stream. During operational periods where recyclable material is removed from the waste stream, a transfer trailer or other appropriate containers will be staged to only receive the recovered material. This single stream or potentially commingled recyclable material will be loaded into the trailer or roll-off container using a process specific loader, primarily a skid steer or bobcat style machine. The material loaded into the recyclable trailer will not be contaminated by putrescible waste. Recyclable material will not be stored onsite for a time period greater than the permit allows. Cardboard material may be compacted or bailed to decrease volume prior to shipping to an end user. If a bailer or compactor is located outside of the transfer station bay, the site plan and/or diagram will be amended to reflect the location.

Regulated Medical Waste (RMW) will be collected and stored on site prior to transfer. Properly packaged, labeled, and marked RMW will be delivered to the facility utilizing route trucks or vans and transferred on to a fifty -three (53) foot enclosed transfer trailer. The transfer trailer will be loaded by hand by employees outfitted with proper personal protective equipment (PPE). Proper PPE will include but is not limited to a safety vest, safety boots, work uniform, safety glasses or goggles, suitable work gloves, and hex-armor gloves. Any improperly packaged, unlabeled, or unmarked waste packages inadvertently collected will not be loaded on to the transfer trailer or stored on site and will be returned to the waste generator.

If the waste is to remain on site for more than seven days after collection from the generator, a refrigerated type trailer will be utilized. The loaded or partially loaded trailers will primarily be staged on a concrete pad inside the facility. If necessary, the trailers may be staged outside the covered area directly in front or beside the warehouse bay. The staged trailers will be inspected

during loading, prior to staging outside, and prior to transfer to identify leaks or spills. If leaks or spills are identified, clean up and decontamination procedures will be implemented as outlined in the transportation vehicle's contingency plan. Once completely loaded, the RMW will be transferred and disposed at a permitted facility. RMW will not be mixed with municipal solid waste accepted at the transfer facility or be permitted to place on the tipping floor of the facility.

At the end of each operational day, all solid waste will be placed in the transfer trailers. The site will be locked at the end of each operational day to eliminate unauthorized use. Reconciliation reports are created daily to show the disposal of materials received. The reports are maintained in a corporate level database system and hardcopies will be maintained at the facility according to audit requirements. A copy of the permit, operations plan, and site drawings are available at the facility.

5.0 EMERGENCY RESPONSE PROCEDURE AND EQUIPMENT

The existing operation includes routine emergency equipment such as phones, radios, and first aid kits. CPR trained employees are available on site. The emergency contacts are listed below:

Contact	Telephone Number
National Response Center	800-424-8802
Regional EPA Office	919-541-2258
NC DENR	828-296-4500
Fire Department	911
Police Department	911
WM District Manager	828-210-1120
WM Healthcare Solutions, Inc. Site Manager	770-517-4202
WM Healthcare Solutions, Inc. District Manager	561-216-9178
WM Environmental Protection Manager	803-760-8197

The City of Asheville will provide first response for any fire situations that occur at the transfer station facility. Based on the location of the facility, the response time from the City of Asheville Fire Department should be less than 15 minutes. As a secondary measure, and based on the severity of the incident, fire extinguishers are located in the operations building, in the tipping floor area, in the storage area and in the transfer trailer loading area. Operators will be trained in the use of fire extinguishers. In addition, standard garden type hose connections are located in the tipping floor area, in the storage area, and in the transfer trailer loading area. The purpose of the hose connections is for floor wash downs.

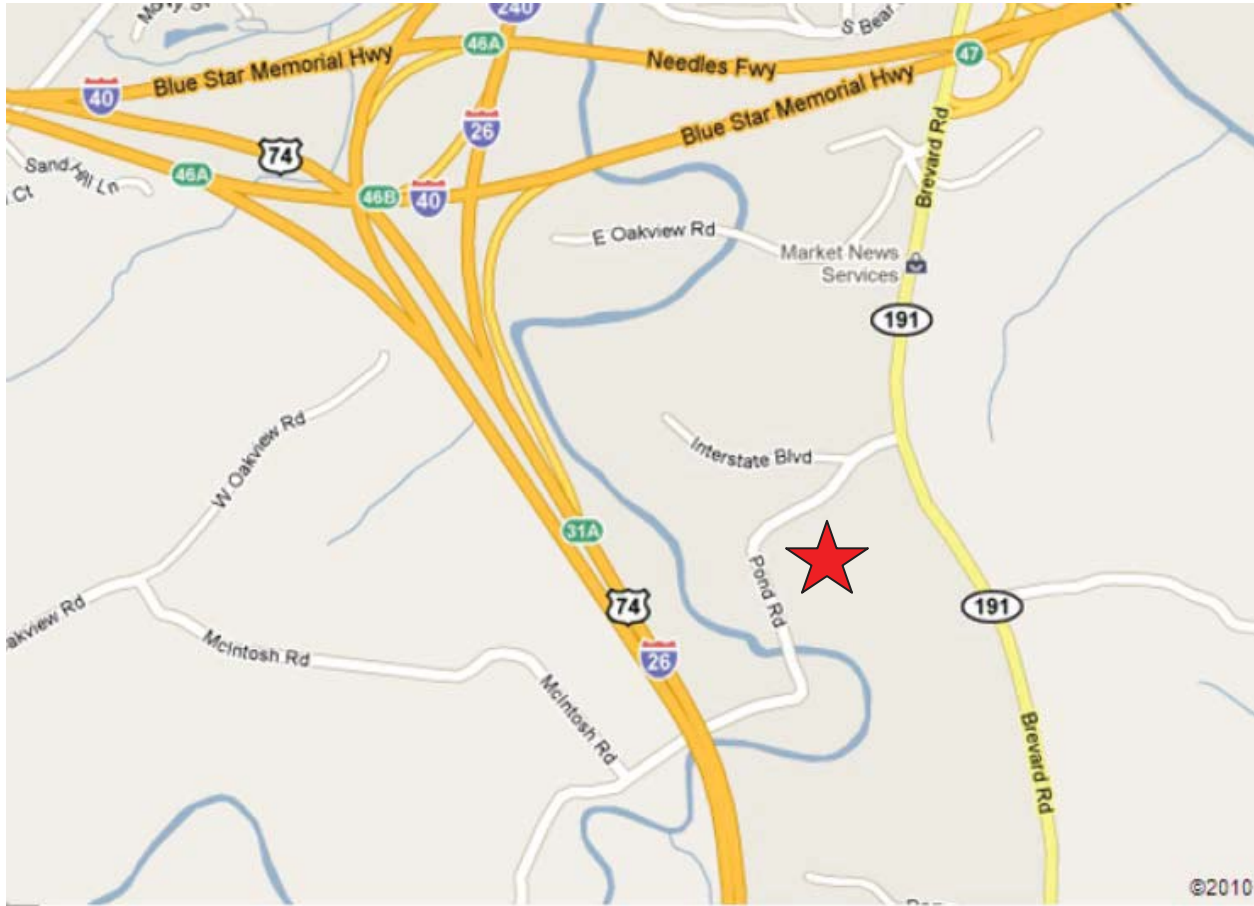
The key to preventing fire hazards at the facility is to remove all solid waste from the site each day. The transfer station is designed and equipped to provide an operation that allows for all waste to be removed from the facility each day, under normal operating conditions.

A total of at least four transfer trailers and a front-end loader will be stationed and or utilized at the transfer station. If equipment failure causes the facility to be unable to transport the entire day's receipts to the approved disposal location, waste will be stored in the transfer trailers. The facility includes a pad capable of storing six loaded transfer trailers in the loading bay. The operation of the front-end loader and transfer trailers will be contracted to a provider who will maintain, repair, or replace the equipment. In the event that repairs will disrupt operation, a rental unit or spare owned by the contractor will be mobilized on site to maintain operations.

In the event of inclement winter weather, the facility will utilize the front-end loader to keep the entrance and turn around area free and clear of ice or snow. If conditions warrant, the facility will be closed to incoming traffic. An onsite back-up generator will be available in the event of loss of power.















ASHEVILLE HAULING AND TRANSFER STATION

FACILITY LOCATION



ASHEVILLE HAULING AND TRANSFER STATION

SITE PLAN

-  SHEET FLOW DIRECTION
-  STORM WATER INLET
-  RECOVERED MATERIAL
-  DRAINAGE BOUNDARY
-  OIL WATER SEPARATOR
-  TRAILER STAGING
-  CONTAINER STAGING
-  TRUCK WASH
-  FUEL ISLAND
-  TRANSFER STATION
-  FUEL/OIL TANKS
-  TRUCK PARKING
-  MAINTENANCE SHOP
-  RMW TRANSFER AREA



**LEACHATE COLLECTION SYSTEM
BEST MANAGEMENT PRACTICES**



**ASHEVILLE TRANSFER STATION
24 POND ROAD
ASHEVILLE, NORTH CAROLINA 28806**

PERMIT NO. 11-04T



August 2013

Prepared By:



1.0 PURPOSE

The purpose of this Leachate Collection System Best Management Practices (BMPs) Plan is to assist in the prevention of environmental impacts due to leachate originating from solid waste transfer station operations and transfer trailers. Leachate not contained within the collection system has the potential to impact site soils and/or surface water.

2.0 REGULATORY AUTHORITY

The following regulations (in part) apply to leachate management at the Asheville Transfer Station:

- 15A North Carolina Administrative Code (NCAC) 13B (solid waste regulations);
- North Carolina Department of Environment and Natural Resources (NCDENR) Solid Waste Section (SWS) Permit No. 11-04T.

3.0 OPERATIONAL AREAS OF CONCERN

The following areas of concern are identified as areas that could lead to the improper handling of leachate:

- 1) Leachate Collection System at the tipping bay doors;
- 2) Leachate Collection System at the loading bay entrance;
- 3) Leachate Collection System piping; and
- 4) Leachate Collection System oil-water separator (OWS).

4.0 ROUTINE OBSERVATIONS

As an aid to insuring that these potential issues are identified and addressed, site employees will conduct routine observations of the four areas of concern in an ongoing, daily basis.

5.0 PREVENTATIVE MEASURES AND MAINTENANCE

In order to prevent the identified sources of leachate from potentially causing environmental impacts, the following preventative measures and maintenance methods will be utilized:

5.1 Tipping Floor Leachate Collection System

The leachate collection system will be maintained to prevent liquids from draining outside the tipping floor bay doors. The drainage conveyance will be observed daily to ensure proper maintenance and operation. The grates will be maintained to prevent the collection of trash but allow for liquid drainage. Damaged or missing grates will be repaired or replaced as soon as possible with covers of similar design

that allow for liquid control. Accumulated waste will be removed from the collection system on a daily basis, or as needed to prevent buildup that impairs the system from proper operation. Sediment and/or grit will be washed from the trench drain and associated piping routinely, as deemed necessary by the operator based on daily observations.

5.2 Loading Bay Leachate Collection System

The leachate collection system will be maintained to prevent liquids from draining outside the loading bay doors. The drainage conveyance will be observed daily to ensure proper maintenance and operation. The grates will be maintained to prevent the collection of trash but allow for liquid drainage. Damaged or missing grates will be repaired or replaced as soon as possible with covers of similar design that allow for liquid control. Accumulated waste will be removed from the collection system on a daily basis, or as needed to prevent buildup that impairs the system from proper operation. Sediment and/or grit will be washed from the trench drain and associated piping routinely, as deemed necessary by the operator based on daily observations.

5.3 Leachate Collection System Piping

The piping associated with collections system will be maintained to prevent liquids from draining outside the loading bay doors. The drainage conveyance will be observed daily to ensure proper maintenance and operation. The piping from the tipping floor will discharge to the loading bay floor drain. Damaged or obstructed piping will be repaired or replaced as soon as possible. Accumulated waste will be removed from the collection system on a daily basis, or as needed to prevent buildup that impairs the system from proper operation. Sediment and/or grit will be washed from the piping routinely, as deemed necessary by the operator based on daily observations.

5.4 Leachate Collection System Oil-Water Separator

The leachate collection system oil-water separator will be maintained to allow for discharge to the sanitary sewer and prevent liquids from draining outside the concrete structure. The exterior of the oil-water separator will be observed daily to ensure proper maintenance and operation. The interior of the oil-water separator will be observed monthly to ensure proper maintenance and operation. The metal cover will be maintained to prevent the collection of debris but allow for internal observation. Damaged or missing covers will be repaired or replaced with covers of similar design. Oil, sediment, and/or grit will be pumped from the structure routinely, as deemed necessary by the operator based on daily observations.

6.0 RECORD KEEPING

This Plan will be maintained onsite with operating records. If routine observation warrant, this plan will be altered or modified to improve operation of the collection system.