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From: Chao, Ming-tai
To: scarrol3@wm.com
Cc: [Watkins, Jason](#); [Patrone, John](#)
Subject: Comments on the Operations Plan, WM/Chatham Co. TS, 19-03T
Date: Wednesday, March 05, 2014 2:34:00 PM

Sent via an e-mail
Date: **February 28, 2014**
Solid Waste Section
Raleigh Central Office

Dear Mr. Carroll:

The Solid Waste Section has completed a review of the Operations Plan (Doc ID 20661) for the Chatham County Transfer Station, Permit # 19-03T, which was received on 02/28/2014. The comments on the Operations Plan are stated below:

1. (Section 3.0) Please provide the contact info of the company to:
 - i. Operate/manage transfer vehicles which transport waste from the transfer station to the permitted disposal waste facility. The Facility Compliance Inspection Report dated January 6, 2014 reported that Stafford Logistics, Inc. is the contractor to transport/haul waste for this facility.
 - ii. Recycle/process tires collected at the transfer station.

The contact info includes facility/company name, physical address, point of contact – name & phone number, permit No (for tire facility only), etc. If a change of contactor(s) occurs between the permit review cycles, the new contact info shall be placed to the facility operating record. Please add the above-mentioned requirements to the Operations Plan.

2. (Sections 4.1 & 4.4) Please define “commercial waste.” The Solid Waste Management Rules (Rule), 15A NCAC 13B, Article 9 of the Chapter 130A of the North Carolina General Statutes (NCGS 130A-290, et seq.) has no definition of “commercial waste;” therefore, please either remove the “commercial waste” from the entire Operations Plan or redefine the received waste according to the Rule.
3. (Section 4.1 & Attachment 1 – 6. Other Unacceptable Wastes Types) Please address the following concerns:
 - i. The Transfer Station can only accept solid waste that is permitted at the facility for transfer and subsequent disposal. Therefore, acceptable wastes for landfilling must meet the requirements of the receiving disposal facility. Please add this requirement to the Sections.
 - ii. Does the transfer station accept animal carcasses or asbestos containing material/waste (a C&D waste) for final disposal? If yes, please describe how these wastes are managed and handled in the tipping floor area; if not, please add these wastes to the “Other Unacceptable Wastes Types.”
4. (Section 4.4) If any non-conformance or unacceptable waste load is detected during the waste inspection/ screening processes, the load shall be rejected, segregated/contained, and reported in accordance with Attachment I – Waste Screening Program. Please revise the context accordingly.
5. (Section 4.6) This section described the site will be “locked” at the end of each operational day. Is the property boundaries enclosed by fencing/gate and other

natural barriers? Please describe the security and assess control measures of the facility to prevent or deter any potentially illegal dumping during the non-operating period.

6. (Section 4.8) Please provide the info of the MRF which is receiving single stream recyclable material collected and consolidated at the transfer station. The info includes facility name, physical address, point of contact – name and phone number.
7. (Section 6.2) Please add the following requirements to the section:
 - i. Open burning of wastes is prohibited at the transfer station.
 - ii. Should a fire break out inside the premise of the transfer station, the Operator shall verbally notify the Division of Waste Management (DWM) (at 919-707-8200) within 24 hours of a fire incident, and a written report shall be submitted to DWM within 15 days following the fire occurrence. The written report describes the fire, the action taken to put off the fire, and approaches to prevent future occurrences. The standard form of a fire occurrence notification can be downloaded from the DWM web site http://portal.ncdenr.org/c/document_library/get_file?uuid=18760b57-0f71-464e-b89f-cf4790caa65f&groupId=38361.
8. (Section 6.3) The phone number for NCDENR emergency contact is 800-858-0368, not 877-623-6748. The NCDENR emergency phone number is manned 24/7. Please revise the phone number accordingly.
9. (Section 7.3) Please provide a drawing to show the leachate piping/floor drain layout at tipping floor and loading bay areas and the connection where the floor drain discharges to a sewer line leading to the Siler City POTW.
10. (Attachment I, Appropriate Action For Unacceptable Waste) The third paragraph shall specify which agencies must be notified for the incident. In a minimum, the Operations Plan may add the following requirement - The District Manager/designee will notify officials of the Division of Waste Management (919-707-8200) within 24 hours of attempted disposal of any waste at the transfer station which is not permitted to receive.

Please contact me if you have any question or request a clarification of the above-mentioned comments. Thanks and have a wonderful day.

Ming Chao

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