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North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

December 7, 2005

Mr. W. Michael Brinchek, PE
Camp Dresser & McKee
5400 Glenwood Ave., Ste. 300
Raleigh NC 27612

Dear Mr. Brinchek:

The Division of Waste Management, Solid Waste Section, has reviewed the application you submitted for the Treatment and Processing Permit referred to as Cumberland County's Wilkes Road Yard Waste Facility. This is the second submittal for this facility.

This draft of the application does not appear to adequately address the following issues mentioned in our December 2004 letter.

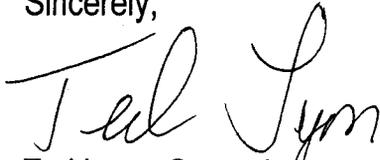
1. The application indicates that material may remain unprocessed for 45 to 60 days. There does not appear to be an indication of the length of time "each of the materials are expected to remain on site prior to processing and removal to market or disposal".
2. The site plan still does not indicate where wood chips are proposed to be colored and coloring wood chips is not included in the operations plan. The fact that the dye is non hazardous does not mean a contingency plan is not necessary for spills of the dye in liquid or powdered form.
3. Record keeping forms were not found in Appendix D and the operation plan does not indicate when annual reports are due.
4. The product screen is not located on the site plan.
5. Wetlands have been delineated on the site plan. However, the permitting guidelines included in the application, as appendix A, indicate that a facility not be located where seasonal wetness is within 12 inches of the soil surface. This is not necessarily consistent with wetlands.

Additionally the application should address the following:

- A. Low carbon nitrogen wastes such as grass clippings are not to be managed at a treatment and processing facility. This should be specified in the operation plan.
- B. Section 2.1 of the operations plan indicates that there are five units of the facility. These five units are not consistent with the labels on the site plan and the site plan does not indicate an area for processed materials or product.
- C. The application indicates that the facility could receive as much as 200 tons of material per day, but does not indicate how long this amount of waste may be received without exceeding capacity. Facility capacity should be given in cubic yards as well as tons.
- D. The operation plan should address operation the household drop off area since it will be part of the permitted area.

Should you have any questions concerning these comments please feel free to contact me at 919.508.8508.

Sincerely,



Ted Lyon, Supervisor
Composting & Land Application Branch

Cc: Dennis Shackleford
B. Howard