



North Carolina Department of Environment and Natural Resources
Division of Waste Management

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Director

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Secretary

July 26, 2013

Mr. Charles Brushwood, Director
Davidson County Integrated Solid Waste Management Department
1242 Old US Highway 29
Thomasville, North Carolina 27360

Subject: Determination of Completeness & Technical Review
Proposed Davidson County Transfer Facility
Davidson County, Document ID 19368

Mr. Brushwood:

The Division of Waste Management, Solid Waste Section (Section) has conducted a completeness review of the document titled *Permit Application – Davidson County Transfer Station* (DIN 19146). The document was submitted on your behalf by Smith+Gardner and received in the Asheville Regional Office on June 14, 2013.

The submittal has been reviewed for completeness in accordance with General Statute 130A-295.8(e). A determination of completeness means that the application includes all required components but does not mean the required components provide all of the information that is required for the Section to make a decision on the application. The permitting activity fee has been paid, and all the components required by 15A NCAC 13B.0401 have been submitted, so the application is deemed **complete**.

Based on this review, it has been determined the Section requires clarification or additional information in order to complete the permitting activity. Please provide a response for each of the followings items:

Compliance Order

1. The Compliance Order issued July 15, 2009 required the daily covering of waste to be documented in the form of a daily cover log with verification of a supervisor. The Condition stated the *revised daily cover procedures, including daily cover log should be included in the facility Operations Plan*. It is the understanding of the Section the facility has a log for the daily cover operations, however, there is no discussion of this activity, or inclusion of a log, in the Operations Manual.

Executive Summary

2. Item 1. on page iii states the *County plans to back-haul processed C&D material from the C&D recycling facility [Abbey Greene Inc., Permit ID 3424-TRANSFER-2010] back to the County's landfill facility for disposal in the C&D and/or MSW landfill units*. However, it appears the C&D recycling facility has a service area much larger than the service are currently approved for Davidson County.

Operations Manual

3. It is the understanding of the Section there are currently mattress and upholstered item deconstruction operations as well as extruded polystyrene foam densification operations at the facility. These activities are not mentioned in the Manual.
4. Section 1.12, Record Keeping Program states the *County will maintain the following records in an operating record at the facility.* However, it is the understanding of the Section some of the records are maintained at Public Works and Services Office on Main Street in Lexington.
5. Section 2.1.2, C&D Landfill Unit or Transfer Station states *Industrial solid waste that is generated by mobile or modular home manufacturers and asphalt shingle manufacturers in Davidson County.* However, it is the understanding of the Section the facility also receives industrial fiberglass wastes generated within Davidson County.
6. Section 2.3.1, Waste Receiving and Inspection states *At least one vehicle per week, but not less than 1% by weight of the waste stream entering the facility (based on the previous week's total), will be randomly selected by inspection personnel.* It is the understanding of the Section the facility inspects one vehicle per week for the C&D landfill facility and once vehicle per week for the MSW landfill facility. Additionally, there is no discussion regarding random waste screenings at the Transfer Station.

If you should have any questions regarding this matter please contact me at (828) 296-4703, or by email at allen.gaither@ncdenr.gov .

Sincerely,



Allen Gaither
Environmental Engineer

Cc: Mr. Pieter Scheer – Smith+Gardner
Mr. Hugh Jernigan – SWS/WSRO