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Backus	02/24/2014	20627	4122T-TRANSFER-2012



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

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February 24, 2014

Mr. David Pepper
Manager
Waste Industries USA, Inc.
3301 Benson Drive, Suite 600
Raleigh, NC 27609

Subject: Permit Application Complete & Application Review
WI Burnt Poplar Transfer, LLC
Permit No. 41-22T, Guilford County, Document ID No. 20627

Dear Mr. Pepper:

The Division of Waste Management, Solid Waste Section, has received your substantial permit amendment application for the WI Burnt Poplar Transfer, LLC (Permit No. 41-22T). This letter is to notify you that the application is considered complete within the context of North Carolina General Statute (NCGS) §130A-295.8(e).

A determination of completeness means that the application includes all required components but does not mean that the required components provide all of the information that is required for the Section to make a decision on the application.

The following list of questions and/or comments is based on a review of the application.

1. On the cover page "Permit to Construct Application", the permit number is shown as 122T. This is incorrect.
2. I found the terminology describing the different operations and areas confusing. I don't think it was consistent.
 - a. The permit will be for one transfer station that can accept and transfer MSW, C&D, and Recyclables. It is not for two independent transfer stations and independent recycling area. See 2.2.1 and 2.2.2, and 2.3.4.
 - b. In Section 2.5.4, an MSW tipping area and a C&D tipping area are described. This doesn't seem consistent with comment 2.
 - c. Is the "Recycling and Recovery" in Section 2.5.5 and "Recovery Operations" in Section 2.6 and "Recovered Material Storage" in Section 2.7 describing the same area? There seems to be a difference in putting the recyclables described in the sections.

3. Where is the recycling area described in Section 2.2.3?
4. Can you provide a drawing(s) that show the separate areas and their use for MSW, C&D, and recyclables?
5. Section 2.2.3 states that pallets can be accepted, while Section 2.3 states wooden pallets will not be accepted. I think there needs to be more clarification on what is accepted or not accepted at the different areas at the facility/site.
6. The permit will contain a condition that you will need to notify the Section if you use landfill other than the ones listed in Section 2.5.2. That is standard.
7. Could you clarify in your list of disposal facility the type of waste accepted by each facility?
8. Section 2.5.5 – by definition, source separation is at the source where the waste is generated. You cannot conduct source separation if it is dumped on the floor. The Section considers any separation other than larger, easily identifiable pieces of that can be pulled from the waste as processing. Please be clearer this separation that you plan to conduct.
9. Section 2.5.5 – Materials must be put in containers at the end of the day. It cannot be left on the floor in the building. Why is this different from Section 2.6 and 2.7?

Please address these questions and comments and make changes where appropriate to the application/operation plan.

If you have any questions regarding this matter, please contact me at (919) 707-8257 or by email at pat.backus@ncdenr.gov.

Sincerely,

Patricia Backus, P.E.
Environmental Engineer
Solid Waste Section

cc: Jeryl W. Covington, P.E., Smith Gardner
Stacey A. Smith, P.E., Smith Gardner
Ed Mussler, P.E., Permitting Branch Head
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