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Solid Waste Section
Raleigh Central Office

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Subject: Comments on the Operations Plan, Anderson Creek Landfill Facility, 43-03 & 43-09T
Date: Friday, November 22, 2013 9:18:00 AM

Hey Amanda:

The Solid Waste Section completed a review of the Operations Plan (Doc ID 19835) for both C&DLF (43-03) and MSW Transfer Station (43-09T) at the Anderson Creek Landfill Facility. It is a mutual understanding that the County will submit a revised Permit Amendment Application covering all waste management units including C&DLF and MSWTS. The SWS expects the responses to the comments below will be incorporated in the revised permit application. The comments on the Operations Plan stated below:

1. (Section 1.6) This Section must address the fire control and fighting plan if a fire breaks out inside the transfer building or a hot load is unloaded on the tipping floor. The Section 1.6.6 must include the fire incident notification requirements if a fire occurs inside the transfer building.
2. (Section 1.7) Throughout this Section please replace “daily” cover to “weekly” or “periodical” cover.
3. (Section 1.10.6) In 2012 OSHA adopted Globally Harmonized System of Classification and Labeling of Chemicals (GHS) which resulted in mandating the use of a single GHS format for safety data sheets (SDS) to replace the existing MSDS. This Section may be required to revise accordingly.
4. (Section 1.12) Should the open burning request be approved at the C&DLF, the notation of the date approval and the name of DWM personnel who approved the burning must be included in the operating record [Rule .0542(i)(2)].
5. (Section 2.0) Please describe the approved service area mentioned in the Subsections 2.1.1 & 2.1.2.
6. (Sections 2.1.1& 2.2.1) Please address the following concerns:
 - i. The Anderson Creek Transfer Station can only accept municipal solid waste (MSW) that is permitted at the facility for transfer for subsequent disposal. Please add this requirement to this Section.
 - ii. Does the transfer station accept medical wastes, animal carcasses, sludge, and septage 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 “prohibited Wastes” lists.
7. (Section 2.1.2) The bullet item # 2 -“Land Clearing and Inert Debris Landfill” is not “waste” and not associated with this Section titled “Acceptable Wastes.” Please remove/delete this paragraph.
8. (Section 2.4.2) Pursuant to Rule .0542(g), please add the requirement of collecting

windblown waste outside the working face at the conclusion of each working day to this Section.

9. (Section 2.5) Please address the following concerns:

- i. (Section 2.5.3) Please identify the specific disposal facility (the facility name, NC Solid Waste Permit Number) where the waste will be transferred and disposed of.
- ii. Please describe the waste rates (ton per day), both historical and projected ones which have been managed or to be managed at the waste transfer facility.
- iii. Please provide a drawing to show the site layout and detailed floor plan of the transfer station including tipping area, push wall, loading bay, the leachate management system (drain lines and storage tanks), etc.

10. (Section 2.6) An asphalt shingle recycling plan (plan) must be prepared according to "Best Practice Guide for Post-Consumer Reclaimed Asphalt Shingles in Asphalt Pavement" (Guide) prepared by Carolina Asphalt Pavement Association date September 2011. The document can be downloaded from the DWM web page http://portal.ncdenr.org/c/document_library/get_file?uuid=79a33b8b-f2c1-468f-a5cf-ad8995b6b96c&groupId=38361

- i. The "General Operation Plan for Tear-off Asphalt Shingle Sorting at a Solid Waste Permitted Facility," the Appendix A of the Guide can be used as a template for preparing the site-specific plan which should be appended to the Operations Plan.
- ii. No grinding or processing of the accepted source-separated asphalt shingle must be emphasized in the plan.
- iii. The maximum amount of the tear-off asphalt roof shingle can be store at the recycling unit need to be described in the plan.
- iv. The contact info of contractor (s) to transport or process the tear-off asphalt roof shingle must be placed in the operating record.

11. (Section 3.1.1) Please describe the surface water run-on control at the waste transfer station such as the covered tipping area and loading bay areas to minimize the leachate amount by separating precipitation from wash-down liquid, and concrete floor graded toward floor drains/sumps.

12. (Section 3.1.3) Please describe how to dispose of the sediment/fill removed from the sediment basins or traps.

13. (Sections 3.2 & 3.3) Please address the following concerns:

- i. Please identify the wastewater treatment plant that receives the leachate from the Transfer Station and landfill units.
- ii. The County's representative proposed to revise the previously approved leachate management plan in the October 31 2013 site visit. Please submit a revised or modified plan for review and approval. The revised/modified plan shall include the as-built information of the constructed leachate system such as the alignments/lengths of the perforated piping (lateral), the depth/size of each leachate sump, the location of leachate load-out station, etc.

I will be on my vacation from 12/06/13 to 12/23/13. If anything comes up and requires

immediately attention during my absence, please contact Ed Mussler at 919-707-8281. Thank you and I wish your all have a wonderful Thanksgiving & Merry Christmas.

Ming Chao

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