

Wake County, North Carolina

Transfer Facility Permit Renewal Application

East Wake Transfer Station Permit No. 92-33T

January 2013

Revised Dec. 2013

APPROVED DOCUMENT
Division of Waste Management
Solid Waste Section
Approved February 17, 2014
By D. Wilson
Doc ID 20516 (permit)
Doc ID 20518 (applic)

PERMIT APPLICATION

EAST WAKE TRANSFER STATION PERMIT RENEWAL APPLICATION

INTRODUCTION

The purpose of this permit renewal application is to renew the permit issued by the North Carolina Department of Environment and Natural Resources (NCDENR) on May 29, 2008, for operation of the East Wake Transfer Station (EWTS) (Permit No. 92-33T) through May 29, 2013. Under Part IV of the General Permit Conditions and pursuant to 15A NCAC 13B .0201(e), the owner or operator must submit a request to the NCDENR, Division of Waste Management, Solid Waste Section for permit review and must update pertinent facility plans including, but not limited to, the facility operation and waste screening plans no later than January 29, 2013. This permit renewal application will provide the updated documentation for continued operation of the EWTS for the next 5-year renewal period or until May 29, 2018. This permit renewal application has been prepared in accordance with the North Carolina Solid Waste Section Rules 15A NCAC 13B .0402 and will address any changes that have occurred in the operational status of the EWTS since the original (prior) permit issue date of May 29, 2008. This permit renewal application, in addition, addresses the following operational requirements as presented in an updated Operations Plan and Procedures Manual attached to this document:

- Waste Acceptance Criteria
- Facility Operations
- Disease and Vector Control
- Signage and Safety Requirements
- Access and Security Requirements

The East Wake Transfer Station, permitted to transfer municipal solid waste to the South Wake Subtitle D Landfill on May 29, 2008, is to continue operating in accordance with the original permit conditions and operational criteria established in the original permit application approved by NCDENR on May 29, 2008. The original permit application submitted in conjunction with the Permit to Construct application for the East Wake Transfer Station (dated August 2002) was not approved until May 29, 2008, subsequent to the North Wake Subtitle D Landfill ceasing landfill operations, requiring that all MSW waste be disposed of at the new South Wake Subtitle D (MSW) Landfill.

The current permit is held jointly by the City of Raleigh as the property owner and Wake County as the transfer station operator. Wake County as the transfer station operator currently contracts with Stafford Transport of NC, Inc. (Stafford) to operate the transfer facility. Although the City of Raleigh and Wake County are joint permit holders, only Wake County is to continue managing the operation of the EWTS transfer facility. The City of Raleigh and Wake County will continue to serve as joint permit holders for the next 5-year renewal period.

The permit renewal application is being submitted jointly by the City of Raleigh and Wake County. However, because Wake County manages the transfer facility it is the County's responsibility to prepare the permit renewal application. The permit renewal application is subject to review by the City of Raleigh before being submitted to the NCDENR Solid Waste Section.

Hazen & Sawyer, on behalf of the City of Raleigh, prepared the Operating Plan and Procedures Manual (2002) that was submitted with the original permit application. The 2002 Operating Plan was updated in 2008. Stafford has prepared and is currently operating under their own Operating Plan and Procedures Manual dated July 1, 2013. However, the original Operating Plan and Procedures Manual prepared by Hazen & Sawyer and updated in 2008 still takes precedence should there be a conflict with the Stafford Operating Plan. The updated Operating Plan being submitted with this permit renewal incorporates the procedures presented in the 2008 updated Hazen & Sawyer Operating Plan along with any changes that have occurred in the operational status of the EWTS since the original (prior) permit issue date of May 29, 2008.

The following information is presented in accordance with the MSW Transfer Station Permit Renewal Guidance Document provided by the NCDENR Solid Waste Section. Wake County is required to submit the following updated information as requested in Sections 1, 3 and 7 of the above referenced Guidance Document for the East Wake Transfer Station permit renewal application. Section 2 of the guidance document dealing with property information and maps, as submitted in the original August 2002 permit application, remains unchanged and as a result has not been included or updated in this permit renewal application. It is the intent of the permit renewal to continue only accepting waste from within Wake County and to dispose of the MSW waste in the South Wake Subtitle D Landfill. No waste will be accepted from outside Wake County or disposed of outside of the Wake County limits.

Section 1 - General Information

1. Name of proposed or existing transfer station.
East Wake Transfer Station (EWTS)
2. Name, address, telephone number and email address of the applicant and contact person.

Wake County is the EWTS operator.

Wake County Solid Waste Management
Wake County Office Building 7th floor
P.O. Box 550
Raleigh, NC 27602

Contact Person: Mr. John Roberson, Director
Wake County Solid Waste Management Division
P.O. Box 550
Raleigh, NC, 27602-0550
(919) 856-6365
john.roberson@wakegov.com

3. Name, address, telephone number and email address of the contract operator and contact person. Stafford Transport of NC, Inc. operates the EWTS on behalf of Wake County and is under contract with Wake County to operate the facility.

Mr. Tommy Smith, General Manager
Stafford Transport of NC, Inc.
East Wake Transfer Station
830 Corporation Parkway
Raleigh, NC 27610
(919) 212-8080
Tommy.smith@staffordlogistics.com

Stafford Transport of NC, Inc. (Stafford) is currently under contract with Wake County to operate the EWTS through June 30, 2021 with an option for a 4 year extension. Wake County will notify the NCDENR Solid Waste Section should there be a change in the transfer station operator.

4. Name, address, telephone number and email address of the landowner.

The City of Raleigh is the landowner.

Mr. Fred Battle, Director
City of Raleigh Solid Waste Services Department
PO Box 590
Raleigh, NC 27602
(919) 996-6867
Frederick.Battle@raleighnc.gov

5. Name, address, telephone number and email address of the consultant preparing this permit renewal application.

BRS Consulting, LLC
5300 Willow Cry Ln
Raleigh, NC 27613
Contact Person: Mr. Robert Brossoie, P.G., C.P.G.
(919) 601-4339
rbrossoie804@gmail.com

6. Name, address, telephone number and email address of person to receive permit fee invoices and annual fee invoices.

Wake County Solid Waste Management
Wake County Office Building 7th floor
P.O. Box 550
Raleigh, NC 27602
Contact Person: Mr. John Roberson, P.E., Solid Waste Director
(919) 856-6365
john.roberson@wakegov.com

Section 2 – Property Information and Maps

Please refer to the original East Wake Transfer Station permit application dated August 2002 (updated in 2008), as this information remains unchanged. As a result, Questions #7 through #13 regarding property information and maps have not been updated or addressed in this permit renewal application.

Section 3 – Operations Plan

14. Description of the wastes to be accepted (e.g. municipal solid waste, commercial waste, industrial waste).

Only municipal solid waste will be accepted at the EWTS as currently stipulated in Part I: Operating Conditions, Item 3 of the permit conditions, wherein it is stated that the EWTS is permitted to receive municipal solid waste generated within Wake County. No changes to this existing permit condition are being proposed for the next 5-year renewal period. Hazardous waste, yard trash, liquid wastes, regulated medical waste, sharps not properly packaged, regulated-asbestos containing material as defined in 40 CFR 61, PCB waste as defined in 40 CFR 761, and wastes banned from disposal in North Carolina by G.S. 130A-309.10(f) will not be accepted for disposal at the East Wake transfer facility.

Additional information is presented in the attached Operations Plan document.

15. Estimate in tons per day expected to be managed at the transfer station.

The average daily tonnage of MSW waste received at the EWTS is 850 tons/day, with a range in tonnage of 600 to 1400 tons/day. The estimated tonnage for the 5-year renewal period is expected to remain at its current average daily tonnage of 850 tons/day.

16. List the service area for the facility (a list of the county or counties from which the site will receive waste).

The EWTS will continue to receive MSW waste generated within Wake County as stated in Part I, Operating Conditions, Item 3. MSW waste generated outside of Wake County will not be accepted.

17. List the specific disposal facilities where the waste will be transferred.

Waste must only be transported to facilities whose service area includes the generation source (i.e. the service area of the transfer station must match the approved service area of the disposal facilities).

The MSW waste received at the EWTS, will be transported to and disposed of at the South Wake Subtitle D (MSW) Landfill located off the Highway 55 Bypass in Holly Springs, Permit Number 92-22.

18. Description of the equipment, scales, structures, tipping floor, water source for cleaning and compactor and hopper. Waste will be unloaded on a tipping floor, and the operation must be covered in a building. Rain water that has come in contact with wastes must be collected and disposed as leachate.

All inbound waste trucks are weighed in at the scalehouse using two inbound lanes and one outbound lane equipped with Fairbanks scales installed by the City of Raleigh during construction of the EWTS. The EWTS facility operator will be responsible for maintenance of the scales. Wake county staff will continue to operate the scales at the transfer station facility. After weighing, inbound trucks circle around the transfer station facility, unload the waste on the tipping floor, proceed back to the scalehouse, weigh out & receive a ticket. The tipping floor is protected from the elements and located inside the transfer station building. The waste on the tipping floor is then pushed to one of two open pits to transfer trailers below, positioned in the transfer tunnel to accept the waste, using one of two solid rubber tired front end loaders. The front end loaders are required to have minimum 5 CY buckets with quick connects. The loaded waste is then compacted in the transfer trucks using a rubber tired excavator with a minimum 30-foot boom, then covered with a tarp and transported to the South Wake Subtitle D Landfill, where the waste load for disposal is weighed in, unloaded and the empty transfer truck then weighed out and a final weigh ticket issued. No scales, weigh hoppers or compactors are located inside the transfer station building.

The transfer facility uses City water paid by the transfer station operator. Fire hoses are used to wet/wash down the tipping floor at the end of each day's operation. The wash water drains to the transfer tunnel where it is collected in a sewer lift station, where it is then pumped to the City of Raleigh's waste water treatment plant for treatment. Rain water that has come in contact with waste is collected and treated using the same process as the wash water.

Additional information is presented in the attached Operations Plan document.

19. Describe site security and access control. Access roads must be of all weather construction. Also describe hours of operation.

All access roads entering the scalehouse and EWTS facility are paved for all weather operation. Site security and access control are provided by 24-hour monitoring of the facility using Wake County Security Center cameras. The scalehouse is also equipped with a burglar/fire alarm. The transfer station is also monitored by the facility operator. Security Center staff also patrol the site after hours. Gates are open during operating hours and closed/locked after hours. The permitted operating hours are from 6:00 AM to 3:00 PM, Monday through Saturday.

Additional information is presented in the attached Operations Plan document.

20. Description of signs to be posted at the entrance to and within the site to direct traffic.

Signs must provide a description of the types of waste received, the types of waste prohibited, operating hours, permit number, and emergency contact phone numbers. The signage currently posted addresses all the items noted above. Should there be any changes to the operating hours, traffic control, etc.; the signage will be promptly updated.

Additional information is presented in the attached Operations Plan document.

21. Personnel requirements, qualifications, responsibilities.

The plan must indicate that a trained employee must be onsite at all times the site is open, overseeing the loading and unloading of waste. Trained personnel provided by the facility operator will be available onsite at all times while the facility is open. Should there be any changes in transfer facility operations, specific information with regard to any changes in trained personnel, qualifications and responsibilities will be provided to NCDENR.

Additional information is presented in the attached Operations Plan document.

22. A narrative description of the operation from the truck arriving at the site, through all steps of the transfer station operation, to the point of waste removal. Describe the traffic flow and procedures for loading and unloading of waste.

Please refer to Item #18 above where a description of the transfer station operation is presented along with a description of the equipment being used in the daily operation of the transfer facility.

Additional information is presented in the attached Operations Plan document.

23. If the facility will take both MSW waste and C&D waste to be loaded for transport separately, describe record keeping of the type of the load at the scalehouse. Describe how the site operators and truck drivers will ensure that each waste load is unloaded at the correct area (e.g. commercial waste must be unloaded at the area for transport to a MSW landfill, not for transfer to a C&D landfill). Only MSW waste is accepted at the EWTS for transport to and disposal at the South Wake Subtitle D Landfill. C&D waste will not be accepted.

Additional information is presented in the attached Operations Plan document.

24. Describe method for screening loads for unacceptable waste.

Transfer station staff are trained to visually screen waste loads as they come into the facility for any prohibited wastes. Should unpermitted wastes be found in the waste stream, the area where the waste is located on the tipping floor will be coned off and monitored until being collected by the generators of the waste and then properly disposed of at an approved off-site waste facility.

Additional information is presented in the attached Operations Plan document.

25. Describe surface water control features, including run-on and run-off.

Exterior drains around the perimeter of the transfer facility collect storm water runoff that is not contaminated by waste. Rainfall or run-on surface water contaminated by waste, along with run-off or wash water used to clean the tipping floor is collected, stored and treated as explained in Item #18 above.

Additional information is presented in the attached Operations Plan document.

26. Describe the collection, storage, and disposal of leachate, wash water, and contaminated rainfall runoff. Runoff from the tipping floor area should be collected and treated as leachate. Leachate must either be collected in a holding tank, pumped as needed, with disposal at a wastewater treatment plant, or leachate may flow directly to a sanitary sewer system with disposal at a wastewater treatment plant.

Please refer to Item #18 above for a general description of the collection, storage, disposal and treatment of leachate and contaminated rainfall/runoff at the EWTS facility.

Additional information is presented in the attached Operations Plan document.

27. Plan for cleaning and washing down the tipping floor on a daily basis. Plan for maintaining facility property in a sanitary condition and actions to be taken to minimize noise, vectors and odors. The tipping floor is to be clear of waste at the end of each operating day.

No waste will remain on the tipping floor at the end of each day's operation.

Additional information is presented in the attached Operations Plan document.

28. Plan for litter and dust control. Procedures to prevent blowing litter from leaving the onsite management areas and from leaving the property.

This information is presented in the attached Operations Plan document.

29. Description of any special waste handling (waste tires, white goods, yard waste, recyclables, etc.). Description of any processing of waste. If wood waste and/or yard waste is to be processed onsite into mulch, provide documentation of compliance with State rules for compost facilities, 15A NCAC 13B. 1401.

Waste loads including any yard waste, scrap tires, lead acid batteries and/or "white goods" received at the EWTS will be rejected and directed to the proper waste disposal facility. No recyclables will be accepted at the EWTS. However, any plastic bottles or aluminum cans included in the waste will remain in the waste. No special waste handling or processing of waste materials or wood waste will be performed at the EWTS.

Additional information is presented in the attached Operations Plan document.

30. Plan for fire prevention and actions to be taken in the event of an accidental fire.

Heat of rise detectors, from Simplex, are located in the transfer tunnel to detect any increases in temperature for fire prevention purposes. The locations of the heat of rise detectors in the transfer station tunnel were updated as part of the recent rehab project to prevent future damage. The system of detectors is

monitored by an alarm service controlled by Wake County GSA. The City of Raleigh fire department is automatically dispatched to the EWTS when the system is activated. The transfer station operator will assist the fire department whenever possible by helping to separate and/or isolate the source of any fire. The transfer station operator in addition to performing monthly fire extinguisher checks also conducts monthly safety meetings to address any safety or fire related concerns.

Additional information is presented in the attached Operations Plan document.

31. Describe record keeping (daily records of amounts by weight received by County of origin, waste screening, inspection records, training). The facility must also keep a copy of the permit, operations plan, and site drawings onsite at all times.

Waste tonnages, both incoming and outgoing, along with where the waste was generated are tracked daily by Wake County based on the tickets generated at both the transfer station scalehouse and the South Wake landfill scalehouse. The information is then transmitted to Wake County's computer server for processing and reporting.

Additional information is presented in the attached Operations Plan document.

32. Contingency plans for equipment breakdown, non-conforming waste delivered to the facility, spills, vectors, noise, odors, unusual traffic patterns, long-term power outages affecting the compactor and leachate pump station, etc.

This information is presented in the attached Operations Plan document.

Section 7 – Signature Pages

Please refer to the attached signature pages required under this section. The City of Raleigh, as the landowner, and Wake County, as the EWTS operator, are both permit holders and therefore both considered applicants during the permit renewal process. Both the City of Raleigh and Wake County have signed the attached signature pages as required for the submittal of the East Wake Transfer Station permit renewal application.

Certification by Land Owner (if different from Applicant):

I hereby certify that I have read and understand the application submitted by WAKE COUNTY for a permit to operate a C&D transfer station/recycling operation on land owned by the undersigned located at (address) 820 CORPORATION PARKWAY; (city) RALEIGH, NC, in WAKE County, and described in Deed Book and Page(s) Book 8392 PAGE 1370.

I specifically grant permission for the proposed C&D transfer station/recycling operation planned for operation within the confines of the land, as indicated in the permit application. I understand that any permit will be issued in the names of both the operator and the owner of the facility/property. I acknowledge that ownership of land on which a solid waste management facility is located may subject me to cleanup of said property in the event that the operator defaults as well as to liability under the federal Comprehensive Environmental Responsibility, Compensation and Liability Act ("CERCLA"). Without accepting any fault or liability, I recognize that ownership of land on which a solid waste management facility is located may subject me to claims from persons who may be harmed in their persons or property caused by the solid waste management facility.

I am informed that North Carolina General Statute 130A-22 provides for administrative penalties of up to fifteen thousand dollars (\$15,000) per day per each violation of the Solid Waste Management Rules. I understand that the Solid Waste Management Rules may be revised or amended in the future, and that the siting and operation of the facility will be required to comply with any such revisions or amendments.

J. Russell Allen
Signature

1/28/13
Date

J. Russell Allen, City Manager
Print name

NORTH CAROLINA

WAKE County

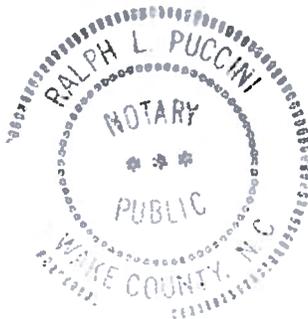
I, RALPH L. PUCCINI, Notary Public for said County and State, do hereby certify that J. RUSSELL ALLEN personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and official seal, this the 28th day of January, 2013.

(Official Seal)

Ralph L. Puccini
Notary Public RALPH L. PUCCINI

My commission expires 9/19/16.



Certification by Operator (if different from Applicant):

Name of facility East Wake Transfer Station

Wake County has an agreement with the transfer station/recycling operation owner to operate a C&D transfer station/recycling operation on the land and the land owner has specifically granted permission for the operation of the facility. I understand that both the operator and owner are jointly and severally liable for improper operations and proper closure of the C&D transfer station/recycling operation.

I understand that North Carolina General Statute 130A-22 provides for administrative penalties of up to fifteen thousand dollars (\$15,000.00) per day per each violation of the Solid Waste Management Rules. I further understand that the Solid Waste Management Rules may be revised or amended in the future and that the facility siting and operations of this solid waste management facility will be required to comply with all such revisions or amendments.

John Roberson
Signature

John Roberson
Print Name

1/24/13
Date

Solid Waste Director
Title

Wake County Government
Business or organization name

NORTH CAROLINA

Wake County

I, DEBORAH A. PETERSON, a Notary Public for said County and State, do hereby certify that John Roberson personally appeared before me this day and

acknowledged the due execution of the foregoing instrument.

Witness my hand and official seal, this the 24th day of January, 2013.

(Official Seal) **DEBORAH A. PETERSON**
NOTARY PUBLIC
Wake County
North Carolina
My Commission Expires 11/9/2013

Notary Public Deborah A. Peterson

My commission expires November 9, 2013

Signature page of applicant -

Name of facility East Wake Transfer Station

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision and that the information provided in this application is true, accurate, and complete to the best of my knowledge.

I understand that North Carolina General Statute 130A-22 provides for administrative penalties of up to fifteen thousand dollars (\$15,000.00) per day per each violation of the Solid Waste Management Rules. I further understand that the Solid Waste Management Rules may be revised or amended in the future and that the facility siting and operations of this solid waste management facility will be required to comply with all such revisions or amendments.


Signature

John Roberson
Print Name

1/24/13
Date

Solid Waste Director
Title

Wake County Government
Business or organization name

OPERATIONS PLAN AND PROCEDURES MANUAL

EAST WAKE TRANSFER STATION

**WAKE COUNTY SOLID WASTE MANGEMENT DIVISION
WAKE COUNTY, NORTH CAROLINA
Permit No. 92-33T**

January 2013

Revised Dec. 2013

OPERATIONS PLAN AND PROCEDURES MANUAL EAST WAKE TRANSFER STATION

TABLE OF CONTENTS

Section 1.0	Introduction	
	1.1 Purpose	1
	1.2 Facility Location	1
	1.3 Facility Description.	2
Section 2.0	Waste Acceptance Criteria	
	2.1 Acceptable Waste	5
	2.2 Prohibited Waste	5
	2.3 Waste Screening Procedures.	6
Section 3.0	Transfer Station Operations	
	3.1 Operating Hours.	7
	3.2 Facility Access.	7
	3.3 Tipping Floor Operations	8
Section 4.0	Disease and Vector Control	
	4.1 Vector Control.	12
	4.2 Rodents and Flies	12
Section 5.0	Signage and Safety Requirements	
	5.1 Signage.	13
	5.2 Open Burning of Waste	13
	5.3 Fire Protection and Prevention	13
	5.4 Notification of Fire	14
	5.5 Safety Equipment	14
Section 6.0	Access and Security Requirements	
	6.1 Transfer Station Access and Security.	16
	6.2 Attendant	16
	6.3 Access Roads.	16

Section 7.0	Miscellaneous	
	7.1 Litter Control	17
	7.2 Dust Control	17
	7.3 Noise Abatement	17
	7.4 Odor Control	18

OPERATIONS PLAN AND PROCEDURES MANUAL EAST WAKE TRANSFER STATION

1.0 INTRODUCTION

1.1 Purpose

The purpose of this updated version of the Operations Plan and Procedures Manual (OPPM) is to renew the Permit to Operate previously issued by the North Carolina Department of Environment and Natural Resources (NCDENR) Solid Waste Section on May 29, 2008, for the inaugural operation of the East Wake Transfer Station (EWTS) (Permit No. 92-33T) through May 29, 2013. This updated OPPM will address the procedural guidelines required for the continued safety, maintenance and operation of the EWTS for the next 5-year renewal period or until May 29, 2018. This OPPM has been prepared in accordance with the North Carolina Solid Waste Section Rules 15A NCAC 13B .0402 – Operational Requirements for Transfer Facilities and also addresses pertinent operational requirements outlined in Rule .0505 – Operational Requirements for Sanitary Landfills. This OPPM also addresses any changes that may have occurred in the operational status of the East Wake Transfer Station since the permit issue date of May 29, 2008. The OPPM, in addition, will address the following operational requirements:

- Waste Acceptance Criteria
- Facility Operations
- Disease and Vector Control
- Signage and Safety Requirements
- Access and Security Requirements

As stated under Part IV of the General Permit Conditions and pursuant to 15A NCAC 13B .0201(e), the owner or operator must submit a request to the NCDENR, Division of Waste Management, Solid Waste Section for permit review and must update pertinent facility plans including, but not limited to, the facility operation and waste screening plans no later than January 29, 2013. It is the intent of this updated document to comply with the General Permit Conditions.

1.2 Facility Location

The East Wake Transfer Station (EWTS), owned by the City of Raleigh Department of Solid Waste Services and operated by the Wake County Solid

Waste Management Division, is located on City of Raleigh property immediately adjacent to the closed Wilders Grove City of Raleigh landfill and directly east of the new City of Raleigh Solid Waste Division offices located at 630 Beacon Lake Drive, Raleigh, NC 27610. The site is bounded by Crabtree Creek, I-440, former soil borrow areas and the closed landfill south of the main disposal unit that closed in 1997. The transfer station facility is situated on a 14.7 acre tract of land at the south end of Corporation Parkway that includes a tipping building, concrete tipping floor, two open pits with metal plated concrete push walls for loading transfer trucks, covered truck loading facilities (lower transfer tunnel) and concrete access roads. The East Wake Transfer Station property is zoned by Wake County as 1-1 (light industrial) and therefore suitable for the operation of public facilities including solid waste transfer stations. The addresses for the East Wake Transfer Station structures are:

Scale House:
840 Corporation Parkway
Raleigh, NC 27610

Offices:
830 Corporation Parkway
Raleigh, NC 27610

Transfer Station Building:
820 Corporation Parkway
Raleigh, NC 27610

1.3 Facility Description

This Operations Plan has been developed for the continued operation of the East Wake Transfer Station (EWTS) for the next 5-year renewal period or until May 29, 2018. The transfer facility is owned by the City of Raleigh and designed to operate as a tipping system under the operational authority of Wake County. The County will control and operate the gates and scale house at the EWTS with Wake County Solid Waste Management Division (SWMD) staff. Wake County has contracted with Stafford Transport of NC, Inc. (Stafford) to operate the transfer facility and serve as waste hauling contractor. The transfer station operator will be responsible for waste acceptance, tipping floor management, loading and hauling of MSW waste, as well as general facility operation and maintenance. The SWMD and transfer facility operator will be required to comply with the provisions outlined in this Operations Plan. The current contract

between Wake County and Stafford is in effect until June 30, 2021, with an option for an additional 4-year extension.

The East Wake Transfer Station consists of a tipping building enclosure, tipping floor, tipping building apron and paved concrete access roads to the apron area on the north side of the building and lower drive-thru truck bays or transfer tunnel on the south side of the building. The tipping floor enclosure consists of a metal building with metal roof, a concrete tipping floor, concrete push walls with metal plating for added wear and two push pits for loading trucks entering the facility on the lower level or transfer tunnel. The transfer trailers are loaded using (2) rubber-tired front end loaders with 5 CY buckets and (1) rubber-track excavator with a 30-foot boom to compact the loaded waste in the transfer trucks. No stand alone compactors or weigh hoppers are used at the transfer facility. Three exhaust fans are located along the south or rear wall of the transfer building for odor control and to maintain air quality within the operating area/tipping floor. The high strength concrete tipping floor, concrete push walls and metal plating used to protect the concrete push walls have been replaced and/or upgraded as part of a recent renovation project. Recent upgrades include renovation of the tipping floor, renovation of the pits, removal of old walls in the tunnel and installation of fencing to allow light into the tunnel while controlling litter, improvements to the facility lighting and fire detection systems, removal of unnecessary rip rap around the structure and installation of turf, improvements to the water collection system around the facility, and upgrades to the lift station.

Wash water from the concrete tipping floor and the two lower drive-thru bays used for loading trucks is collected and directed to an onsite lift station for discharge to the City of Raleigh sewer system and treatment at the City of Raleigh Wastewater Treatment Plant. The same process is used to collect rain water that comes in contact with the waste. The transfer facility will continue to transfer all MSW waste received at the facility to the South Wake Subtitle D Landfill during the 5-year renewal period. Only MSW generated within Wake County will be accepted at the EWTS.

The transfer station operator maintains an office at the facility through which the operator can be contacted. Contact information is provided in the permit renewal application, as well as in this updated Operations Plan. The facility office is equipped with a telephone service and will have a responsible person in charge available at all times while the facility is in operation. The operator will also provide an on-call service seven days per week so that the County can contact

the operator in the event of an emergency or in the case of unexpected or special waste disposal activities at the transfer facility. The operator will keep the County informed at all times as to the name and contact information for the employee on-call. The operator will also designate an employee as safety officer for the transfer facility. The transfer facility operator currently conducts monthly onsite safety and/or training meetings.

The operator will maintain detailed records of all transfer station operations and make such records available for inspection by the County or any authorized representative of the County and/or the City of Raleigh. All dealings, contacts, etc. between the County and the transfer station operator will be directed to the primary contact person designated by each party. The primary contact persons for issues concerning operation of the East Wake Transfer Station are:

Wake County – Mr. Johnny Beal, Solid Waste Facilities Manager
Wake County Solid Waste Management Division
P.O. Box 550
Raleigh, NC 27602
(919) 518-0272
jbeal@wakegov.com

EWTS Operator – Mr. Tommy Smith, General Manager
Stafford Transport of NC, Inc.
830 Corporation Parkway
Raleigh, NC 27610
(919) 212-8080
Tommy.smith@staffordlogistics.com

2.0 WASTE ACCEPTANCE CRITERIA

2.1 Acceptable Waste

The transfer station will accept only those wastes for which the facility is permitted, namely the municipal solid waste (MSW) to be disposed of in the permitted South Wake Subtitle D Landfill. The East Wake Transfer Station will accept only MSW waste (i.e. residential, commercial and industrial waste) generated within the Wake County service area. No waste will be accepted from outside of Wake County.

2.2 Prohibited Waste

No C&D waste will be accepted at the East Wake Transfer Station. In addition, barrels and drums will not be accepted unless they are empty and perforated sufficiently to ensure that they contain no liquids or hazardous wastes. Yard wastes or any other recyclable materials will not be accepted, along with infectious waste, medical waste, animal waste, animal carcasses, sludge or radioactive waste. Aluminum cans and plastic bottles, if encountered within the waste stream, are approved by the NCDENR as being acceptable for disposal given the stringent nature of the recycling process. A report will be prepared by the transfer station operator to document any attempted delivery of waste which the transfer facility is not permitted to accept, including waste from outside the permitted transfer station service area. Reports will be presented to Wake County for reporting to the NCDENR Solid Waste Section.

Scrap tires, lead acid batteries, wooden pallets and/or “white goods” will not be accepted at the EWTS. However, any plastic bottles or aluminum cans included in the waste will remain in the waste. Otherwise, no recyclables are accepted at the East Wake Transfer Station. Regulated medical waste/sharps, hazardous or liquid wastes will not be accepted at EWTS. No special waste handling or processing of waste materials or wood waste will be performed at the EWTS.

2.3 Waste Screening Procedures

Transfer station staff are trained to visually screen waste loads as they come into the facility for any prohibited wastes. Should unpermitted wastes be found within the waste stream, the area where the waste is located on the tipping floor will be coned off and monitored until being collected by the generators of the waste or properly disposed of at approved solid waste facilities by contracted vendors. Random inspections of incoming loads will be conducted at the transfer facility at a rate to be determined by the transfer station operator, but will be

conducted at least on a bi-weekly basis. Haulers will be asked to describe the origin and contents of their waste load as part of the random screening.

For any attempted unacceptable wastes delivered to the transfer facility, the facility operator is to record the following.

- Date, time and name of inspector
- Hauler name, driver name and type of truck
- Source of load
- Description of load
- Record estimated quantity
- Provide photos and/or videos as appropriate
- Final disposition of waste load when appropriate

Waste that is not acceptable will be reloaded onto the waste truck that brought it to the transfer station and removed from the facility. Where this is not practical or safe, a properly trained and equipped hauling contractor will be contacted to properly handle and dispose of the waste load.

3.0 TRANSFER STATION OPERATIONS

3.1 Operating Hours

The East Wake Transfer Station operating hours are from 6:00 AM to 3:00 PM, Monday through Saturday. Any changes in the operating hours will be updated on facility signage before going into effect. In addition, all vendors currently using the facility will be notified prior to any change in operating hours should new operating hours go into effect. In the event of an emergency or for needed maintenance the transfer facility may, in addition, be open on Sundays and/or outside of regular work hours, as needed, to address unexpected or unplanned events. For planned operations the transfer station will be closed New Year's Day, Memorial Day, Fourth of July, Labor Day, Thanksgiving Day and Christmas Day. Signage has been posted at the entrance to the transfer station facility identifying the days and hours of operation.

3.2 Facility Access

Vehicle access is restricted to the access road at the southern end of Corporation Parkway at the location of the transfer station scale house. There are no other access roads into the transfer station facility. All waste haulers are directed to pass over one of two inbound weigh scales. All other vehicles are directed to the bypass lane, which is controlled by a remote gate. Access to the transfer facility during operating hours is controlled by scale house personnel. Only those with business at the transfer facility, including customers, staff, maintenance personnel, etc. are allowed access into the facility. The transfer facility is not open to the public. Gates at the entrance to the scale house will be locked to restrict vehicle access when the transfer facility is closed. The entire perimeter of the transfer facility is fenced to restrict pedestrian access. The perimeter fencing is visually checked on a regular basis to identify any breaches in the fencing and to make repairs as needed. The transfer station operator's main office building and adjacent buildings are locked when the facility is closed. Surveillance cameras have been installed to monitor the facility after hours. Any unauthorized facility access or illegal dumping will be reported to the Wake County Solid Waste Management Division, City of Raleigh, the NCDENR Solid Waste Section and the City of Raleigh Police Department. An incident report will be kept on file by the transfer station operator.

3.2 Tipping Floor Operations

Collection vehicles delivering residential, commercial and/or industrial waste to the transfer facility will first proceed to the new East Wake Transfer Station scale house to be weighed in using one of the two inbound weigh scales. Waste delivery vehicles are then directed via signage and concrete access roads to circle around the south side of the transfer building to then enter the transfer building on the north side to discharge their waste load within the enclosed transfer building on the concrete tipping floor. Waste delivery vehicles will be directed onto the concrete tipping floor by the transfer station attendant to an area designated by the attendant. Once the waste vehicle is in position and the waste has been inspected by the attendant the waste load will be discharged directly onto the tipping floor. The waste delivery vehicle will then be given the OK to leave the tipping floor by the transfer station attendant once the area to depart is clear of any personnel or obstructions. Unloaded waste vehicles are then directed back to the scale house to weigh out empty so as to determine the waste tonnage delivered to the transfer facility by each waste vehicle.

Operators using one of the two available front end loaders with protective hard rubber padding on the underside of the front bucket and specially designed hard rubber tires will then push the discharged waste along the concrete tipping floor to either one of two open pits located at the south end of the upper level tipping floor. Open top transfer trailers will pull into the lower drive-thru truck bay or transfer tunnel to align themselves beneath the open pits. Once the transfer trailer is in position the operator will load and compact the waste into the transfer trailer by pushing the waste from the tipping floor into either one of the two open pits ready to accept waste. Once the transfer trailer(s) are completely loaded, they are compacted in place using a rubber-tracked excavator with a 30-foot boom. Each load is then driven directly to the permitted South Wake Subtitle D Landfill for disposal. All loads will be covered with tie-down tarps during transport to control wind-blown trash.

The loaded transfer trailers are first weighed in at the South Wake landfill scale house prior to unloading at the working face and then weighed in again at the scale house when empty to determine the waste tonnage delivered to the landfill. Weigh tickets generated at both the transfer station scale house and the landfill scale house are provided to Wake County to determine the tonnages delivered to each waste facility for reporting to the NCDENR Solid Waste Section and for invoicing the waste generators.

The tipping floor and two lower drive-thru bays will be washed down periodically during daily operations and at the end of each work day to remove

accumulations of waste residue, which otherwise could become a safety hazard. The wash water drains to the transfer tunnel where it is collected in a sewer lift station and then discharged to the City of Raleigh sewer system for treatment at the City of Raleigh Wastewater Treatment Plant. Rain water or run on water into the facility that has come in contact with waste is also considered leachate and collected and treated using the same process as the wash water.

The transfer station operator will have the right to reject materials or reject unacceptable loads in accordance with the permit conditions that would cause a violation of the Solid Waste Section standards, rules or regulations. The transfer station operator will take title of the waste when accepted at the East Wake Transfer Station and will retain title until the waste is disposed of in the permitted South Wake Subtitle D Landfill. As stated above, the County limits the delivery of waste to the transfer station to waste generated within Wake County.

The transfer station operator will provide all the equipment and labor needed to receive and process waste deliveries in a reasonable and efficient manner, including having backup equipment and additional labor on-call as needed to address transfer station operations. The transfer station operator will operate the East Wake Transfer Station in accordance with all prescribed permit conditions, applicable laws and permits, standards, rules and regulations. The transfer station operator will make reasonable efforts to accommodate delivery of waste during other than regular work hours following reasonable notice from the County. No waste is to remain on the tipping floor at the end of each work day.

The transfer station operator will provide traffic control while equipment is operating on the tipping floor and while waste vehicles are entering and departing from the transfer facility. Any equipment that becomes inoperable while the transfer station is operational will be removed so as not to obstruct the traffic flow. The transfer station operator will be required to have back up equipment available at all times so as not to delay daily operations should equipment breakdowns occur.

The transfer station operator will be required to comply with Rule .0505(8)(c) of the North Carolina Solid Waste Management Rules by obtaining and maintaining a valid Wake County Solid Waste Collectors License. The transfer station operator will be responsible for all utility expenses associated with the operation of the East Wake Transfer Station. The operator will also be responsible for the protection of existing transfer station infrastructure including buildings, paved access roads and drainage ways at the

transfer station facility, within the City of Raleigh property limits, associated with operation of the transfer station. Any damage to the City of Raleigh property resulting from actions of the transfer station operator or the operator's employees will be restored or repaired to a condition satisfactory to the County and City of Raleigh at the operator's expense. Failure of the operator to make repairs as a result of damage to the existing facilities will result in Wake County making the necessary repairs and deducting the costs for repairs from payments due the transfer station operator. The transfer station operator will not be held responsible for any property damage caused by the City, County or other outside parties using the transfer facility, including independent waste haulers.

The transfer station operator will be responsible for meeting all health, environmental and safety standards applicable to operation of the East Wake Transfer Station together with any ancillary facilities. If any unacceptable waste is detected in a delivery, the waste load and vehicle will be isolated from all other transfer station operations and the waste screening protocol implemented by the transfer station operator to include notifying the appropriate authorities and contacting the generators of the waste. Records will be maintained by the transfer station operator as to the designated disposal location for unacceptable waste.

A certified transfer station operator will be required to be onsite at all times. All transfer station employees are to be certified in hazardous waste identification. All vehicles, containers, trailers and other equipment are required to be maintained in good repair, appearance and sanitary condition at all times. Each vehicle operating at the transfer station is to be clearly identified with vendor identification and contact numbers. The transfer station operator will be responsible for daily cleanup of the work site including picking up refuse and other items (e.g. refuse spilled while loading transfer trailers or other daily operations).

In transporting the waste to and from the transfer station facility the transfer station operator will be responsible for enforcing that all waste vehicles cover, contain, tie down or by some other method enclose all solid waste such that leaking, spillage and blowing of waste is prevented. The transfer station operator will also be responsible for compliance with all local, state and federal rules, regulations and laws concerning the transportation of waste materials and equipment associated with the operation of the East Wake Transfer Station, including but not limited to OSHA, DOT and DMV requirements.

All solid waste collected at the transfer station will be transported to and disposed of at the permitted South Wake Subtitle D Landfill solid waste facility. The transfer station operator will not be charged for the disposal of solid waste at the South Wake landfill.

4.0 DISEASE AND VECTOR CONTROL

4.1 Vector Control

In accordance with Rule .0505(12)(a), Wake County will be responsible for providing effective vector control measures for the protection of human health and the environment. Vector control at the transfer facility includes air borne or water borne sources. Disease vectors are defined as any rodent, flies, mosquitoes or other animals, including insects, capable of transmitting disease to humans.

Control of disease vectors will be maintained by implementing a daily cleaning program, which will include but not be limited to the removal of waste, leachate and ponded water from the transfer station tipping floor and other operating areas within the facility. The removal of waste from the tipping floor at the end of each day's operation will protect against the migration of vectors into and from the transfer station. Stagnant or ponded water will be prevented from occurring to control mosquito breeding.

4.2 Rodents and Flies

To control potential disease vectors the County may retain the services of a licensed exterminator or other professionals to abate the problem. However, vectors such as flies and rodents are not expected to be of concern with removal of the waste and wash down of the tipping floor at the end of each day's operation.

5.0 SIGNAGE AND SAFETY REQUIREMENTS

5.1 Signage

Signage at the East Wake Transfer Station has been posted to comply with Rule .0505(9)(a)(b)(c) addressing the hours of operation, contact information for both the County and the transfer station operator, a description of the types of waste accepted at the facility, what wastes are prohibited from being accepted at the facility, the facility permit number, emergency contact numbers and other warnings or restrictions associated with delivering MSW waste to the transfer facility. Signs have also been posted at the entrance to the facility and within the facility grounds to direct traffic. Signage directing all waste haulers to the weigh scales and all visitors and work staff to the bypass lane and the transfer station offices has been posted at the entrance to the scale house at the end of Corporation Parkway. Inside the facility signage has been posted directing the waste haulers to the tipping floor apron area and transfer trailers to the lower truck bay. The signage currently posted addresses all the items noted above. Should there be any changes to the operating hours, traffic control, etc.; the signage will be promptly updated.

5.2 Open Burning of Waste

In accordance with Rule .0505(10)(a), the open burning of waste will not be permitted at the East Wake Transfer Station.

5.3 Fire Protection and Prevention

In accordance with Rule .0505(10)(b), the transfer station operator will be responsible for providing equipment to control accidental fires and will also be responsible for arranging with the local fire protection agency to provide fire-fighting services when needed. In addition, the transfer station building will be equipped with the required number of fire extinguishers and one fire hydrant, to effectively control accidental fires. Rate of rise type heat detectors, from Simplex, are located in the transfer tunnel to detect any increases in temperature for fire prevention purposes. The system of detectors is monitored by an alarm service controlled by Wake County GSA. The City of Raleigh fire department is automatically dispatched to the EWTS when the system is activated. Audible and visual alarms located on the tipping floor level will also be activated. The transfer station operator will assist the fire department wherever possible by helping to separate and/or isolate the source of any fire.

All transfer facility buildings will be equipped with the number and type of fire extinguishers required by the City of Raleigh Fire Department and applicable fire codes. The transfer station operator and fire department staff will conduct periodic inspections of fire suppression equipment and promptly service or replace equipment as needed. The transfer station operator in addition to performing monthly fire extinguisher checks also conducts monthly safety meetings to address any safety or fire related concerns.

Should a “hot load” be delivered to the transfer facility the load will be discharged on the tipping floor away from other waste so the fire cannot spread and to allow sufficient clearance for fire fighters to extinguish the fire.

For any “hot loads” discharged on the tipping floor, the nature of the waste in the load is to be visually checked for any hazardous or toxic materials. Should the potential for any toxic or hazardous materials be observed the Fire Department is to be contacted immediately. If needed, the area around the waste load can be contained by placing loads of soil around the waste in question. Vehicles, personnel and other waste are to be kept a safe distance until the situation is resolved. Once the “hot load” has been extinguished and it has been determined that no hazardous or toxic materials are present, the waste can be loaded into a transfer trailer for transport to the landfill.

5.4 Notification of Fire

The transfer station operator will be required to contact Wake County directly by phone or in person to report fires that accidentally occur at the East Wake Transfer Station. The County is to be notified as soon as possible, but no later than the end of the work day that the fire occurred. The transfer station operator will be required to document such events as part of their required daily record keeping.

5.5 Safety Equipment

All operations staff and visitors working on the tipping floor will be required to wear proper safety equipment, including steel toe shoes, safety vests, as well as eye and hearing protection. In addition, all workers will be required to wear gloves, hard hats or harnesses, as appropriate, for added safety protection. All personnel will be properly trained in the proper use of safety equipment and safety procedures.

All heavy equipment, including waste trucks, are to be equipped with back-up alarms. Restricted areas for equipment and personnel are to be clearly marked and cordoned off. Portable safety barriers are to be placed at the leading edge of the loading pits when the pits are inactive. Barriers are to be of sufficient size to prevent work staff from falling into the openings.

6.0 ACCESS AND SECURITY REQUIREMENTS

6.1 Transfer Station Access and Security

All vehicles delivering waste to the transfer station will be required to enter and exit through the access control gate at the entrance to the transfer station scale house. Unauthorized vehicle access to the transfer facility will not be permitted and will be monitored by the scale house and transfer station operators throughout each day's operation. Unauthorized vehicles will be redirected to the appropriate waste disposal facilities.

6.2 Attendant

Wake County will provide a full-time scale operator located in the scale house at the entrance to the East Wake Transfer Station during transfer station operating hours to weigh incoming waste loads and outgoing empty waste vehicles. Both the scale operator and the transfer station operator will work together to verify that all waste vehicles delivering waste to the East Wake Transfer Station comply with the permitted transfer station operations.

6.3 Access Roads

The transfer station operator will be responsible for maintaining and cleaning all paved access roads on a daily basis, including but not limited to the paved access roads located between the transfer station scale house the transfer station tipping building. Wake County is to be contacted for authorization of any repairs to the transfer facility access roads associated with operation of the East Wake Transfer Station.

Operation of the transfer facility will require strict adherence to traffic controls and the traffic routes identified by signage at the facility. Portions of the access road around the tipping building are one way to maintain traffic flow. Incoming waste trucks and transfer trailers are restricted to their designated routes and are to be kept separated from one another wherever practical. Empty transfer trailers will be limited to a designated staging/storage area at the transfer facility.

7.0 MISCELLANEOUS

7.1 Litter Control

The operator will also be responsible for cleanup of wind-blown debris resulting from daily transfer station operations. At the end of each day's operation, wind-blown debris resulting from operation of the transfer station will be collected and returned to the transfer facility by the transfer station operator for proper disposal. Litter may be generated by uncovered or secured loads, from transfer trailer loading operations in the lower bay, as well as from the tipping floor itself. Cleanup will include all areas within the transfer station site limits, as well as other areas on adjacent City of Raleigh property that can reasonably be attributed to transfer station operations. The spillage of refuse from transfer trailers is to be minimized by requiring that all loads be covered with tie-down tarps, as well as requiring all transfer trailer operators to reduce their speed between the scales and the tipping floor. The transfer station operator will also be required to discharge all incoming loads on the tipping floor well within the covered transfer building. Maintenance of the skirts around the transfer pits and proper staging of the transfer trailers while loading waste in the lower bay area is to be part of the daily transfer station operation to control debris. Litter fencing is to also be used by the transfer station operator to control wind-blown debris.

7.2 Dust Control

The transfer station operator in addition to removing debris from all paved access roads is to use a water truck to apply water to road surfaces when needed to control dust. Road surfaces will also be kept clean by removing any mud tracked into the transfer facility to reduce creating dust when access roads are used by the transfer trucks.

7.3 Noise Abatement

Noise is a normal part of facility operations at the transfer facility both inside and outside the transfer building and is therefore considered acceptable during operating hours. Given the isolated location of the transfer station, the impact of higher noise levels at the facility is less likely to have an impact on surrounding businesses. Operation of the transfer station will however comply with all noise ordinances in effect within the City of Raleigh limits.

Generally noise levels are greatest within the transfer station building during the unloading of waste trucks onto the tipping floor and while loading waste into the transfer trailers. As a result, facility staff will be provided with hearing protection while working in high noise level areas.

Haulers using waste vehicles with excessively loud exhaust systems will be directed to make repairs before continuing to use the transfer facility.

7.4 Odor Control

The transfer station operator will also be responsible for odor control. Three exhaust fans are located along the south or rear wall of the transfer building for odor control and to maintain air quality within the operating area/tipping floor. Wash down of the tipping floor on a daily basis will also help to reduce odors. In addition, loaded transfer trailers will be covered immediately after loading and before transport to the landfill for disposal to help control odors. Filled trailers will not remain at the transfer facility for more than 24 hours before being transported to the landfill, except under emergency conditions.



**Environmental
Services**

TEL 919 856 7400
FAX 919 743 4772

Solid Waste Management Division
P.O. Box 550 • Raleigh, NC 27602
www.wakegov.com/recycling

December 18, 2013

Donna J. Wilson
Environmental Engineer
North Carolina Department of Environment and Natural Resources
Solid Waste Section/Division of Waste Management
1646 Mail Service Center
Raleigh, NC 27699-1646

**Subject: East Wake Transfer Station Permit 92-33T; 2013 Permit Renewal
Application**

Dear Ms. Wilson,

On behalf of Wake County attached please find the revised Application for Permit Renewal for the East Wake Transfer Station, Permit Number 92-33T. The Permit Renewal Application and updated Operations Plan and Procedures Manual were prepared in accordance with the North Carolina Solid Waste Rules 15A NCAC 13B .0402 and the Application Guidance for a MSW Transfer Stations provided by the Solid Waste Section of the Division of Waste Management for NC DENR.

As requested, we have addressed your review comments and we have revised the documents accordingly. Included below are your comments and information on the revisions we made.

1. Please update the application regarding the change in contract operator.

The new contract operator of East Wake Transfer Station (EWTS) is Stafford Transport of NC, Inc. (Stafford). This information has been updated on pages 2 and 3 of the Permit Renewal Application and on pages 2 and 4 of the Operations Plan and Procedures Manual.

2. The address for the transfer station is listed as 830 Corporation Pkwy in the application, but the yellow pages address is 840 Corporation Pkwy, and the Raleigh Solid Waste Services website lists the address as 820 Corporation Pkwy. Please clarify.

The correct street addresses for the buildings are:

East Wake Transfer Station
820 Corporation Parkway
Raleigh, NC 27610

Stafford Transport of NC, Inc. Office
830 Corporation Parkway
Raleigh, NC 27610

East Wake Transfer Station Scale House
840 Corporation Parkway
Raleigh, NC 27610

The addresses have been revised on page 2 of the Operations Plan and Procedures Manual. Street addresses are posted on the buildings in accordance with local regulations.

3. Please provide an update on the rehab and repair work.

Extensive repairs were made to East Wake Transfer Station in the past year. Engineering services for the project were provided by CDM Smith and Scotia Construction Company completed the renovation project. Work included improvements to the structural slab, tipping floor wear surface, additional armoring of the push walls, renovation of the pit area, improvements to the tunnel area, improvements to the electrical system and fire detection system, renovation of pumps, and improvements to building drainage and landscaping. Project cost (including design, construction and various equipment was just under \$1.7 M and substantial completion occurred in late February 2013.

4. Section 2.2 of the operating plan states that yard waste will not be accepted, and that yard waste will be accepted. Please clarify.

Yard waste is not accepted at the facility. Section 2.2 of the Operations Plan and Procedures Manual has been revised to reflect that yard waste is not accepted at the facility.

5. Section 2.2 states that the facility will not accept recyclables, but it also states that scrap tires, batteries, white goods, yard waste, and pallets will be separated for recycling. Please clarify.

Section 2.2 of the Operations Plan and Procedures Manual has been revised to reflect that scrap tires, white goods, wooden pallets, lead acid batteries and yard waste are not accepted at the facility.

6. Section 2.2 – Separating out scrap tires, lead acid batteries, white goods, pallets, and yard waste from the waste stream to store and transport separately offsite is considered special waste handling. The last sentence in Section 2.2 and the next to last sentence in #29 of the first section should be modified.

Revisions to Section 2.2 of the Operations Plan and Procedures Manual and to #29 of the Permit Renewal Application have been made to clarify that no special waste handling or processing of waste materials or wood waste will be performed at East Wake Transfer Station and that unacceptable materials will be rejected upon arrival and the transporter will be directed to the proper waste disposal facility.

7. **Section 2.2 - How are the special wastes and recyclables stored and how often are they removed from the site? Please clarify if the other buildings on the transfer station property are used for solid waste management activities, such as storage of recyclables, as indicated in the original permit application.**

Special wastes and recyclables will not be stored at the site. Revisions to Section 2.2 of the Operations Plan and Procedures Manual have been made to clarify that no recyclables will be stored on site. Other buildings on the site are not used for storage of recyclables.

8. **The operating plan should address how the facility will address the current problem of large amounts of liquid spilling from the filled trailers awaiting transportation offsite.**

Wake County and City of Raleigh are working toward a resolution of the issue. Representatives of both agencies met with Dennis Shackelford and Shawn McKee of the Solid Waste Section to review a proposal from Stafford to construct a large concrete pad where trailers would be stored while waiting to be transported to the landfill. Any leakage would be collected in sumps that would drain into the sanitary sewer system. Unfortunately, we recently learned that City of Raleigh regulations concerning structures within flood areas will create issues for the plan.

City of Raleigh brought in their consulting firm, Hazen & Sawyer and Wake County brought in Smith+Gardner to provide consulting services to assist us in developing and implementing a plan to resolve the issue. We are scheduled to meet with Dennis Shackelford and Shawn McKee on January 14, 2014 at the site. We will update you on the outcome of that meeting and we will keep you informed as we move forward on a resolution to the issue.

Please contact me if you have additional comments or concerns.

Sincerely,



John Roberson, PE
Solid Waste Management Director

cc: Johnny Beal, WCSWM
Tommy Smith, ECR
Bob Brossoie, BRS Consulting, LLC

January 31, 2014

Ms. Shawn McKee
Environmental Senior Specialist
NCDENR Division of Waste Management Solid Waste Section
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

**RE: Transfer Trailer Leakage Inspection and Control
East Wake Transfer Station - Permit No. 92-33T
Raleigh, North Carolina**

Dear Ms. McKee:

On behalf of Wake County, Smith Gardner, Inc. (S+G) has prepared this response to a Notice of Deficiency (NOD) (**Attached**) regarding leaking transfer trailers. As a follow up to our recent site meeting on January 14th, we agreed that site personnel may resolve this issue through operational changes and increased monitoring which is also consistent with the conditions of the NOD repeated below as follows:

- *All transfer trailers need to be inspected to insure that they are leakproof¹; and*
- *A contingency plan must be developed to address times of inclement weather which results in unusually high precipitation to insure that leachate draining from the waste is contained within the leachate collection system.*

Therefore, we offer the recommended revisions to the Operations Plan and Procedures Manual (OPPM) that is currently under review for permit renewal.

Proposed Revisions

S+G and Wake County have jointly determined that an additional section be included and entitled "**Transfer Trailer Maintenance Procedures**" in the OPPM. The proposed section is as follows:

¹ Please note that the Regulatory Reform Act of 2013 (House Bill74/S.L 2013-413) signed into law on August 23, 2013, states the following:

"SECTION 59.2(b) Collection and Transport Rule. – Until the effective date of the revised permanent rule that the Commission for Public Health is required to adopt pursuant to Section 59.2(d) of this act, the Commission and the Department of Environment and Natural Resources shall implement the Collection and Transport Rule, as provided in Section 59.2(c) of this act.

SECTION 59.2(c) Implementation. – Notwithstanding any provision of the Collection and Transport Rule, the Commission shall not require vehicles or containers used for the collection and transportation of solid waste to be leak-proof; however, they may require that these containers be designed and maintained to be leak-resistant in accordance with industry standards"

“3.4 Transfer Trailer Maintenance Procedures

The proper maintenance of incoming and outgoing transfer trailers shall be monitored to insure compliance with solid waste management regulations. Each trailer shall be maintained and monitored in accordance with trailer manufacturer’s recommendations. This process must be maintained by the facility personnel including the operator, drivers, and support personnel.

3.4.1 Pre-Loading Inspections

Prior to all transfer trailers being pulled in to the transfer station pit area (ie. “the tunnel”), the following visual inspection will be performed by the driver or site personnel:

1. Check to see if current trailer is marked for maintenance. If so, the trailer will be taken out of service until the proper repairs can be made;
2. Ensure that the rear door seal is clear of any debris or obstructions;
3. Check that trailer seal is intact and adequate to contain potential leakage (ie. No chips, rips, or premature cracking or degradation);
4. Ensure that trailer door is jacked or ratched closed; and
5. Perform a visual inspection (walk around) of the trailer to look for holes, cracks, missing bolts, or other integrity issues associated with the body of the trailer.

If any deficiencies are noted, site personnel shall report any issues to the site manager. In the event, the site manager determines the trailer may need repair, it will be marked for maintenance and taken out of service until the proper repairs are completed.

3.4.2 Loaded Inspections

Once the transfer trailer has been loaded and compacted, site personnel shall inspect the trailer inside the pit (the containment area) for signs of leakage. If leakage is observed, the following steps will be followed:

1. Pull trailer forward to the front of the pit so additional trailers can be filled;
2. Observe the location of the leakage and note any deficiency in trailer integrity causing the leak. If a deficiency in trailer integrity is present, site personnel shall report any issues to the site manager. In the event, the site manager determines the trailer may need repair, it will be marked for maintenance, unloaded, and taken out of duty until the proper repairs are completed;
3. Trailers will be allowed to sit inside the pit as time allows and as necessary to allow leakage to subside. If the leakage does not subside, the trailer will be pulled around to the back (entrance) of the pit area or to a designated transfer trailer storage area where the leakage can be observed and collected; and

4. Once no leakage is observed, the trailer will be pulled out of the pit and prepared for transfer to the South Wake Landfill.

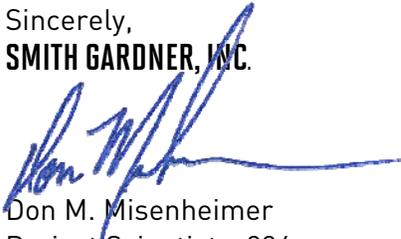
3.4.3 Pre-Transport Inspections

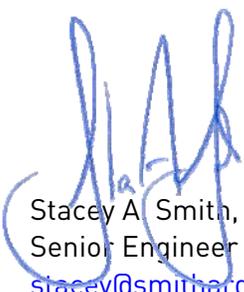
Once each trailer has been moved from the pit area and is placed in the staging area, the potential of leakage may occur. Therefore, site personnel and or drivers will perform the following tasks upon staging each trailer and prior to leaving the site:

1. Position the trailer so that any liquids present inside the trailer will drain toward the rear;
2. If it is raining or rain is expected, the trailer shall be immediately covered;
3. The trailer will be observed periodically for any potential leakage that may develop. If a deficiency in trailer integrity is present, site personnel shall report any issues to the site manager. In the event, the site manager determines the trailer may need repair, it will be marked for maintenance, unloaded, and taken out of service until the proper repairs are completed; and
4. In the event leakage is identified at the end of the day, loaded transfer trailers shall be stored undercover in the pit area or on the transfer floor (within the containment areas)."

Wake County is prepared to revise the Operations Plan and Procedures Manual as proposed above upon NCDENR review and approval. We appreciate your assistance in this matter and hope that this will satisfactorily resolve the current NOD. If you have any questions or require additional information, please contact us at (919) 828-0577 or by email below.

Sincerely,
SMITH GARDNER, INC.


Don M. Misenheimer
Project Scientist x 224
don@smithgardnerinc.com


Stacey A. Smith, P.E.
Senior Engineer x 127
stacey@smithgardnerinc.com

Attachment – Notice of Deficiency (7/24/13)

cc: Dennis Shackelford, NCDENR
Donna Wilson, NCDENR
John Roberson, P.E., Wake County
Johnny Beal, Wake County
Lee Squires, P.E., Wake County
Fred Battle, City of Raleigh
Tommy Smith, Stafford Transport
File



North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management

Pat McCrory, Governor
John E. Skvarla, III, Secretary

July 24, 2013

CERTIFIED MAIL 7010 3090 0001 4226 0201 and 7010 3090 0001 4226 0591
RETURN RECEIPT REQUESTED

Mr. Frederick Battle, Director
City of Raleigh Solid Waste Services Department
400 W Peace St
Raleigh, NC 27603

Mr. John Roberson
Wake County Solid Waste Management Director
P.O. Box 550
Raleigh, NC 27602

SUBJECT: **Notice of Deficiency**
Compliance Inspection Report
City of Raleigh/Wake County - Raleigh MSW Transfer Station
9233T-TRANSFER-
Wake County

Dear Mr. Battle and Mr. Roberson:

On July 10, 2013, Shawn McKee and Dennis Shackelford, representing the State of North Carolina, Division of Waste Management Solid Waste Section ("Section"), inspected the above referenced facility for compliance with North Carolina Solid Waste Statues and Rules. [List facility contacts present] were present representing [Facility Name]. During this inspection, the following items were noted and/or observed:

15A NCAC 13B .0105 (c) *Vehicles or containers used for the collection and transportation by whatever means, including but not limited to, highway, rail, and navigable waterway, of garbage, or refuse containing garbage, shall be covered, leakproof, durable, and of easily cleanable construction. These shall be cleaned as often as necessary to prevent a nuisance or insect breeding and shall be maintained in good repair.*

The above deficiency may have or can compromise the facility's ability to ensure protection of the public health and the environment and thus require remedial action on behalf of the facility in order to be in compliance with 15A NCAC 13B .0105 (c). **Within 30 days of receipt of this Inspection Report or Notice of Deficiency, the facility must complete the following:**

- All transfer trailers need to be inspected to insure that they are leakproof; and

- A contingency plan must be developed to address times of inclement weather which results in unusually high precipitation to insure that leachate draining from the waste is contained within the leachate collection system.

Failure to comply with this schedule may subject the facility and/or all responsible parties to enforcement actions including a notice of violation, civil penalty, injunction from operation of a solid waste management facility or a solid waste collection service and any such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules. Pursuant to N.C.G.S. 130A-22(a) and 15A NCAC 13B .0701-.0707, an administrative penalty of up to \$15,000.00 per day may be assessed for each violation of the Solid Waste Laws, Regulations, Conditions of a Permit, or an Order issued under Article 9 of Chapter 130A of the N.C. General Statutes.

If you have any questions, please contact me at 919-707-8284 or shawn.mckee@ncdenr.gov.

Sincerely,



Shawn McKee
Environmental Senior Specialist
Solid Waste Section

copies: Ellen Lorscheider, Planning and Programs Branch Head – Solid Waste Section
Dennis Shackelford, Eastern District Supervisor – Solid Waste Section
Jessica Montie, Compliance Officer – Solid Waste Section
Johnny Beal, Wake County Solid Waste Management Division
Tommy Smith, General Manager – CEI, East Wake Transfer Station