

From: Chao, Ming-tai
To: "[Joan C. Snider](#)"
Cc: [Shackelford, Dennis](#); [Hare, Wes](#); [Tim Rogers](#); [Randy Rogers](#)
Subject: RE: Wayne Co. LF - 96-01 - Plans for shingles, concrete, and yard waste
Date: Monday, July 29, 2013 8:46:00 AM
Attachments: [Yard Waste Guidance 3-11.pdf](#)

Hey Joany:

The temperature monitoring requirement on the yard waste piles is according to the "Yard Waste Guidance." Passive Composting approaches and monitoring requirement are described on Page 3 of the "Yard Waste Guidance." It is not rule or statutory requirement at this time; however, I would like to point out that the elevated temperatures may be built up inside the yard waste pile (it all depend on the pile sizes and density, moisture, ambient temperature and air flow conditions) and potentially cause fire. In the past, several fire incidents occurred in stump dumps & LCIDLFs. To me, these facilities/units operate as some types of passive composting. The County has the option not to conduct the temperature monitoring for this case, but I, as a permit reviewer have to remind you any potential consequence. Have a nice day or vacation.

Ming Chao

From: Joan C. Snider [mailto:joan.snider@waynegov.com]
Sent: Friday, July 26, 2013 5:33 PM
To: Chao, Ming-tai
Cc: Shackelford, Dennis; Hare, Wes; Tim Rogers; Randy Rogers
Subject: RE: Wayne Co. LF - 96-01 - Plans for shingles, concrete, and yard waste

Thanks for the quick review Ming. We really appreciate it!

I have responded in RED text below each comment, and we plan to make many of the changes you have requested. However, on the last comment, you have left us a little confused. We were under the impression that since the mulch/compost is not going to be sold or used off-site, temperature monitoring would NOT be required. If you could provide some additional clarification we would really appreciate it.

Talk to you soon!

Sincerely,

Joany Snider @ Wayne County Landfill

P.S. – I'll be back in the office on Thursday, August 1st.

Operation Plan for Sorting Tear-off Asphalt Shingles for Recycling

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1. (Waste Acceptance) Please add the waste service area – Wayne County only to this section.

WC – Changes made.

2. (Stockpile Details) The Operation Plan describes" the stockpile area has dimensions of approximately 20' X 20' X 10', which is 4,000 square feet." According to the described sizes, it is evidently the stockpile area is 400 square feet. Please correct the typo.

WC – Changes made.

3. (Contracting Company) To avoid any confusion, please describe that landfill facility will not engage activities of sorting, processing, or grinding the collected recyclable asphalt shingles. The

off-site contractor and/or the facility that process or grind the recyclable asphalt shingles are responsible for conducting required asbestos sampling and testing prior to processing or grinding the recyclable shingles.

WC – Changes made.

4. The proposed single recycle unit will be located on the top of the closed MSWLF, which is a portion of the planned C&D waste disposal area. This Operation Plan needs to address the following issues to prevent the recycling operation from interference of the C&D waste disposal operation:
 - i. Control of traffic volume and flow direction. It is unlikely an issue right now due to business downturn and slow recovery; however, the housing and construction projects are slowly coming back. To prevent any traffic accident at the landfill facility, it is imperative that the County plans the traffic flow pattern – egress / ingress the two adjacent units on top of the closed MSWLF. Please provide a flexible traffic control plan including a sketch to show the planned traffic flow pattern. (traffic cones and/or portable signs or flag man are good tools)

WC – Changes have been made to address some of your concerns. No additional traffic controls are needed because the shingle area is adjacent to the existing C&D working face. Vehicles, regardless of whether they have C&D or shingles, are all directed to follow the signage to the C&D landfill. We have added language specifying that signage will be placed at the shingle stockpile.

- ii. Will the shingle recycling unit be relocated to other places when the C&D waste footprints extend to the area where the shingle recycling unit is seated? If so, how often? (It is advised that the unit is seated a location w/o moving until the permit renewal cycle – 5 years or 10 years periods)

WC – Yes, the shingle stockpile area will be relocated as phases are filled. We have added additional language to clarify our intent.

- iii. The active landfill gas wells and collection piping may be located in the recycling unit; therefore, please identify if any gas well and piping (lateral and header piping) are located in or adjacent to the shingle recycling unit (a map shows the locations of gas wells and piping relative to the location of the proposed recycling unit), and provide a plan to protect the landfill gas collection system if the well and piping are existing in or adjacent to the unit.

WC – Section 1.5 was added to the C&D Landfill Operation Plan to address your concerns previously. We have referenced this plan and added additional language regarding protecting GCCS components to the shingle plan.

Operation Plan for Passive Composting in Former Borrow Pit #1

5. (Fire Prevention and Control) To ensure that the stockpiled material will not have excessive temperatures (>160 degrees F) which could lead to spontaneous combustion, the Solid Waste Section recommends the County conducts a regular monitoring of the passive compost piles and document the activities in the operating record. Should any excessive temperature be detected and confirmed, the County must take a necessary action such as turning or wetting the stockpile to eliminate any potential spontaneous combustion. The proceeded action(s) must be documented in the operating record. If the County agrees this recommendation, please add the above-mentioned statements to the operation plan.

WC – Questions.

Please contact me if you have any questions or require further clarification of the above-mentioned comments. Have a nice weekend.

Ming-Tai Chao, P.E.
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From: Joan C. Snider [<mailto:joan.snider@waynegov.com>]
Sent: Monday, July 22, 2013 4:07 PM
To: Chao, Ming-tai
Cc: Hare, Wes
Subject: RE: Wayne Co. LF - 96-01 - Plans for shingles, concrete, and yard waste

Ouuuu thank you Ming! My bosses will be very happy with your response!

Very good – I'm glad you kept them together as one document.

Have a great day!!!!

~Joany

From: Chao, Ming-tai [<mailto:ming.chao@ncdenr.gov>]
Sent: Monday, July 22, 2013 4:05 PM
To: Joan C. Snider; Hare, Wes
Cc: Mussler, Ed; Tim Rogers
Subject: RE: Wayne Co. LF - 96-01 - Plans for shingles, concrete, and yard waste

Hey Joany:

The Solid Waste Section (SWS) received your application for operating the following miscellaneous waste management units at the Wayne County C&DLF (Permit # 96-01):

- Tear-off asphalt shingle unit.
- Passive composting unit (in Former Borrow Pit #1).
- Inert debris storage & processing unit (in Former Borrow Pit #1).

For document tracking purpose, the above-referenced documentations are combined into a single document with the assigned document tracking number (Doc ID) 19359 and will be reviewed by the SWS shortly.

The SWS will gladly assist Wayne County to obtain authorization for operating these waste management units in proper and environmental friendly manners. Additionally, to respond the County's request, the SWS waves the permit modification fee at this time (Please be advised that this is a case-by-case decision which should not be considered or construed as a precedence for future permit activities). Upon completion of the permit-reviewing processes for these proposed waste management units, the SWS will issue the County an operation authorization letter, in lieu of a permit - Permit to Operate. The approved documents must be placed in the Operating Record and incorporated into the future Permit

Amendment Application.

Please contact me if you have any questions on this matter. Have a wonderful day.

Ming-Tai Chao, P.E.
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Division of Waste Management
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From: Joan C. Snider [<mailto:joan.snider@waynegov.com>]
Sent: Monday, July 22, 2013 2:04 PM
To: Chao, Ming-tai; Hare, Wes
Subject: Wayne Co. LF - 96-01 - Plans for shingles, concrete, and yard waste

Hi Ming and Wes,

I have attached a document to this email that contains the operation plans for:

- Sorting Tear-off Asphalt Shingles for Recycling
- Passive Compositing in Borrow Pit #1
- Inert Debris Storage and Processing in Borrow Pit #1

If you prefer to make comments in a Word document using the track changes tool, I can send a Word file of the plan narrative as well. Hopefully we are on the right track! As you know, we'd really rather not have to go through the permit modification process and pay the modification fee to conduct these recycling activities.

Thanks so much!

Joany Snider
Wayne County Landfill
(919) 689-2994, ex. 304

P.S. – Sorry if you got this email twice!