



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

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July 30, 2013

Mr. Gary Hayes, Environmental Services Director
Yadkin County
P.O. Box 1298
Yadkinville, North Carolina 27055

Subject: Technical Review
Yadkin County Transfer Facility
Yadkin County, Permit # 9903T-TRANSFER-1994, Document ID 19315

Mr. Hayes:

The Division of Waste Management, Solid Waste Section (Section) has completed a review of the document titled *Yadkin County Solid Waste Permit Renewal Request* (DIN 18965). The document was received in the Asheville Regional Office on May 31, 2013.

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

Operations Plan

1. Section III, Facility Owner states Mr. Gary Hayes, Environmental Services Director, is the key person associated with facility operations. It is the understanding of the Section Mr. Hayes is not at the facility on a regular basis. We recommend adding the name and contact information for a person on site at all times during operating hours.
2. Section IV, Facility description states the wastewater holding tanks are *pumped out once per week*. Section VI, Operation Plan, Part E, Wastewater Management states the wastewater holding tanks are *pumped out monthly*. Please revise the language to eliminate the inconsistency.
3. Section VI, Operation Plan, Part A, General states white goods are *stored in a designated area until the Freon is removed*. The Facility Plan drawing included with the submittal seems to show two locations for white goods and these locations appear inaccurate relative to current operations. Please revise the Facility Plan drawing to clearly and accurately show the location for white goods handling.
4. The Plan makes no mention of the LCID area. A description of the management of LCID wastes should be included in the Plan and the area of management should be shown on the Facility Plan drawing.
5. The Plan makes no mention of electronics recycling. A description of the management of electronics recycling activities should be included in the Plan and the area of management should be shown on the Facility Plan drawing.

6. The Plan makes no mention of contract operations at the facility. If contract operations are utilized, the details of the arrangement should be provided to the Section as the contract operator will be listed on the Permit.
7. Section VI, Operation Plan, Part F, Hazard and Nuisance Control states *windblown material, if any, will be picked up and discarded as needed*. Rule .0402(7) requires all windblown material resulting from the operation shall be collected and returned to the area by the owner or operator at the conclusion of each day of operation. The language in the Plan should agree with the Rule requirement.
8. Section VI, Operation Plan, Part F, Hazard and Nuisance Control states *the access roads and the areas adjacent to the MSW Transfer Station are paved to help lessen the problems associated with dust*. It is the understanding of the Section these areas are not paved and are covered with gravel. If this is the case, the language should be corrected and a dust control strategy should be included in the Plan.
9. It is the understanding of the Section the facility would like to store empty trailers on the closed C&D landfill cap located adjacent to the Transfer Station. If this is true, the Plan should reflect this information and the area should be identified on the Facility Plan drawing. In addition, a description of how the County will ensure/maintain cap integrity should also be included for review and approval.

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

Sincerely,



Allen Gaither
Environmental Engineer

Cc: Mr. Charles Gerstell – SWS/MRO
Mr. John Murray – SWS/MRO