



DELAWARE SOLID WASTE AUTHORITY

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June 20, 2013

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Ms. Nancy C. Marker
Division of Waste and Hazardous Substances
Department of Natural Resources
Environmental Control (DNREC)
89 Kings Highway
Dover, DE 19903

Re: Response to Request for Additional Information/Permit Renewal Application
Route 5 Transfer Station

Dear Ms. Marker:

The Delaware Solid Waste Authority (DSWA) submitted a request for the renewal of the Route 5 Transfer Station, permit SW-03/02. The Department of Natural Resources and Environmental Control (DNREC) requested additional information in your letter dated May 1, 2013. DSWA submits the following information in response to that request. Three print copies and one electronic copy of the following documents are included with this letter.

1. Checklist Item #4 (Plan of Operation)

a. Section 1.) Description of Facility and Waste Handling Procedures:

DNREC Comment:

"The facility also accepts commercial recyclable materials which are loaded into trailers and sent to market."

Please explain in further detail, somewhere in the plan of operation, the process by which the facility will receive, store, process and/or transfer the recyclable material. More specifically, please describe the intended management of the single-stream recyclable materials the facility is currently receiving.

DSWA Response:

A section identified as *2.i Loading and Transferring of Recyclables* is added in the revised Plan of Operation, *Section 2) Method of Operation and Maintenance*.

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b. Section 1.c) Loading, Storing and Transferring of Waste

DNREC Comment:

“Once a trailer is full, it will be pulled from the transfer station building, tarped and either leave the facility or be parked at the designated area for temporary storage. Full trailers routinely leave the property the same day the waste is received.”

This paragraph was modified from its original form by removing the words “sent out for disposal” and replaced with “leave the facility”. Please revise the paragraph to somehow indicate the trailer’s contents will be transported to, or received at, a facility authorized to accept the contents.

DSWA Response:

The requested change has been incorporated.

c. Section 2.b) Waste Handling:

DNREC Comment:

“The transfer station will handle solid waste as stated in the Plan of Operation.”

This statement was modified from its original form replacing “operations permit” with “Plan of Operation”. For further clarity and consistency, and to reference the Plan of Operation, describe in further detail the handling of solid wastes at the facility. Please also include in this section, or another separate section, the handling procedures for recyclable materials, including single-stream recyclables managed at the transfer station, and how the materials will be segregated from the solid waste stream.

DSWA Response:

The original term “operations permit” has been reinstated. The handling of solid wastes is described in *Section 1. Description of Facility and Waste Handling Procedures*. A separate section, 2.i. Recycling, is added in *Section 2) Methods of Operation and Maintenance*.

2. Checklist Item #12 (Conceptual Closure Plan):

DNREC Comment:

a. Please explain in further detail the conceptual closure plan (Revised February 2013) items in section “a” of the closure plan, as required in 7 Del Admin

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Code Section 10.6.3, including detailed descriptions of the items that will be performed upon the cessation of operations.

DSWA Response:

The requested revisions are included in a revised Conceptual Closure Plan.

DNREC Comment:

b. Please also provide in section "b" of the closure plan (Revised February 2013), updated closure cost estimates for closure activities of the facility. The currently listed cost estimates for closure activities indicate little to no change from the 2008 closure cost estimates submitted with the original facility application.

DSWA Response:

The original cost estimate submitted by Malcolm Pirnie in 2003 was \$8,850. A new cost estimate was developed in 2012 and submitted December 21, 2012 with DSWA's annual Financial Assurance Mechanism Certification-GASB 18. The 2012 closure cost is estimated at \$15,540.

Attached is also a revised *Plan of Operation - Attachment B*. The emergency contact for the contractor operating the transfer station has changed.

If you have questions or require additional information, please do not hesitate to contact me at (302) 875-3448 or jv@dswa.com. Thank you for your assistance with the renewal process.

Sincerely,



James Vescovi, P.E., BCEE
Facility Manager

cc: Logan V. Miller, P.E., BCEE
Shawn L. Lovenguth

Attachments
jv:cah
ssw13.030