CRAVEN LCID
(A Land Clearing and Inert Debris Landfill)
PERMIT NUMBER _____

Permit Application Data and Operation Plan

356 Sanders Lane
Number 8 Township
Craven County
New Bern, N.C.

For

Craven LCID, LLC
Mr. Terry D. Morris, Agent
109 Swift Creek Road
Vanceboro, NC 28586
(252) 670-6749

Prepared By

Michael L. Rice, P.E.
ROBERT M. CHILES, P.E.
P.O. Box 3496
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May 31, 2013
Revised August 23, 2013

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INDEX

Section 1 - General Information
Section 2 - Property Information and Maps
Section 3 -Operation Plan
- General
- Groundwater Data
- Types of Waste Accepted/Prohibited
- Sources of Waste
- Volume of Waste
- Equipment
- Site Security and Access Control
- Hours of Operation
- Signs
- Road Maintenance
- Surface Water Control
- Wet Weather Operation
- Fire Prevention
- File Management
- Cover Material
- Permit Renewal
- Site Closure

Section 4 - Sedimentation and Erosion Control Plan
Section 5 -Application for 5-Year Permit
Section 6 - Signature Page
Appendix
Section 7 - Drawings
- Proposed Expansion to a 4.1 Acre LCID Landfill Site for Craven LCID, LLC, prepared by Robert M. Chiles, PE.
- Section and Isometric Views of the Proposed LCID Topographic Contours for Craven LCID, LLC, prepared by Robert M. Chiles, PE.
- Area Within 1/4 Mile of the 4.1 Acre LCID Landfill Site for Craven LCID, LLC, prepared by Robert M. Chiles, PE.

Section 1 - General Information

Craven LCID is the name of this proposed land clearing and inert debris (LCID) landfill.

R.J. Bushhogging, Inc. previously operated a notification LCID on site. On January 11, 2011, the NCDENR, DWM, Solid Waste Section issued a closure letter bearing notification number N0634 for the RJ Bushhogging LCID. The closure was recorded in Craven County Register of Deeds book 2989 at page 507.

Landowner / LCID Owner / LCID Operator:

Craven LCID, LLC.
109 Swift Creek Road
Vanceboro, NC 28586
Mr. Terry D. Morris, Agent

Mr. Terry D. Morris is the individual in responsible charge of the LCID daily operations. Mr. Morris will receive permit fee and annual fee invoices at the LLC address, and can be reached via telephone at (252) 670-6749

Applicant's Consulting Engineer:

Robert M. Chiles, PE
Engineers and Consultants
P.O. Box 3496
New Bern, NC 28564-3496
(252)637-4702

Section 2 - Property Information

The property containing the LCID is located on NCSR 1243 and the physical address is 356 Sanders Lane. The property is between 340 and 370 Sanders Lane and directly across the street from 355, 365, and 379 Sanders Lane. The Craven Co GIS website indicates that the current tax parcel number is 8-225-15000.

Sanders Lane extends from NCSR 1005 to NC HWY 55, west of New Bern and north of the Craven County Industrial Park. Sanders Road intersects with NC HWY 55 approximately 3.2 miles west of the intersection of NC HWY 55 and NC HWY 43 Connector, at Washington Post Road. The property driveway is approximately seven-tenths of a mile north along Sanders Lane from the intersection at NCSR 1005.

As mentioned in section one, a notification LCID was previously operated onsite by R.J. Bushhogging, Inc. On January 11, 2011, the NCDENR, DWM, Solid Waste Section issued a closure letter bearing notification number N0634 for the RJ Bushhogging LCID. The closure was recorded in Craven County Register of Deeds book 2989 at page 507.

The property contains a total of 10.01 acres, the existing boundary of the LCID fill material covers approximately 4.05 acres and the proposed boundary of the LCID fill material covers approximately 3.60 acres. There are approximately 0.70 acres of existing roads within the property. The road surface materials include asphalt and gravel. (paragraph revised, 8/6/13 revision)

As there are no archaeological or historic sites, state parks, recreation or scenic areas, or any other lands in the state nature and historic preserve located on the project site, or within one-quarter mile of the project site, it is presumed that the proposed facility shall not damage or destroy any such site, and that it complies with 15A NCAC 13B.0564 (4) and (5). (paragraph added, 8/6/13 revision)

The following enclosures are provided in the Appendix for additional information:

- Craven County Deed Book 3193, Pages 218-221.
- Road Map with Approximate Location Indicated.
- Portion of USGS Quadsheet "JASPER" with Approximate Location indicated.
- Copy, Zoning Consistency Letter from Craven County Office of Planning and Community Development.
- Portion of FEMA FIRM Community Panel Number 372 554000J with approximate location indicated.
- Copy, USFWS Internet generated National Wetlands Inventory Map for site.
- Copy, Cover letter to US Fish and Wildlife Service regarding endangered species.
- Copy, Response from US Fish and Wildlife Service .
- Copy, Cover letter to NC Wildlife Resources Commission regarding endangered species.
- Copy, Response from NC Wildlife Resources Commission
- Copy, 2005 Response from NCDENR Natural Heritage Program regarding endangered species, natural and historic sites.
- Copy, Cover letter to NCDENR Natural Heritage Program regarding endangered species, natural and historic sites.
- Copy, 2013 Response from NCDENR Natural Heritage Program regarding endangered species, natural and historic sites

(paragraph added, 8/6/13 revision)

Section 3 -Operation Plan

General

The proposed landfill will incorporate and reactivate an existing land clearing and inert debris landfill that is located on the site. The landfill will be operated entirely above the original ground surface. The facility will operate in accordance with 15A NCAC 13B.0564 and 15A NCAC 13B.0566. (paragraph revised, 8/6/13 revision)

If existing material is removed for screening, consolidation, and replacement in order to regain storage capacity, excavation will be limited to a depth approximately equal to that of the original ground surface. In the event that deeper excavation is necessary, then only uncontaminated soil will be used to restore the excavation to the original grade.

Groundwater Data

On August 8, 2005 the ground water table elevation was measured directly in a test pit excavated to a depth of 8 feet below the original grade. At 9AM the top of the ground water was located 7.4 feet below the original ground surface elevation of the proposed site. At 12PM the top of the ground water was located 7 feet below the original ground surface elevation of the proposed site. The top layer of wet soil was observed in the test pit at a depth of 5 feet below the existing grade.

The original ground at the project site is approximately at elevation 20 NAVD88. Bachelor Creek is located approximately 1400 feet away from the proposed LCID boundary, and a number of ditches are located between the site and the creek.

Observations were made during April and May, 2005 site visits to identify the possible elevation of the ground water table. During all site visits, the property line ditch adjacent to the site and those between the site and creek were dry. The invert of the property line ditch is approximately 6 feet below the existing ground elevation of the site. The water surface elevation in Bachelor Creek is estimated to be 15 feet below the existing ground elevation of the site.

Electronic data retrieved from the NCDENR Division of Water Resources identifies two surficial aquifer wells near the project site. Wells Q 21T1 - Vanceboro and S 22J4 - Clarks are located 8.8 and 1.5 miles from the site, respectively. These wells are located at similar ground elevations as the LCID site and both indicate mean depths to the surficial aquifer of 8 to 10 feet below existing ground.

The currently existing site (2013) contains approximately 10 feet of fill above the original ground elevation. Given that operations are proposed to remain entirely above the original ground elevation, the provided separation distance

between the bottom of landfilled material and the seasonal high groundwater table elevation will exceed the required four feet minimum.

Types of Waste Accepted/Prohibited

Craven LCID will only accept land clearing waste, yard trash, yard waste, untreated and unpainted wood, and inert debris.

The following definitions contained within North Carolina General Statutes and the North Carolina Administrative Code are provided for reference:

Land clearing waste	means solid waste which is generated solely from land clearing activities such as stumps, trees, limbs, brush, grass, and other naturally occurring vegetative material.
Yard trash, yard waste	means solid waste resulting from landscaping and yard maintenance such as brush, grass, tree limbs, and similar vegetative material.
Inert debris	means solid waste which consists solely of material that is virtually inert and that is likely to retain its physical and chemical structure under expected conditions of disposal, such as concrete, brick, concrete block, uncontaminated soil, rock and gravel.

Prohibited waste includes, but Is not limited to tires, appliances, petroleum products, automobiles, household garbage, treated lumber, insulation, and medical waste. Prohibited items that are discovered among otherwise acceptable incoming waste material shall be removed from the site by the transporter attempting delivery. Prohibited items discovered onsite shall be separated from surrounding acceptable material, removed from the disposal area of the LCID upon discovery, and transported to an appropriate waste facility during the next convenient operating hours of the receiving facility.

The owner's agent, or in his absence, the facility's assigned operator, is responsible for screening all received waste. In accordance with 15A NCAC 13B.0566 (8):

> The facility shall be adequately secured by means of gates, chains, berms, fences, etc., to prevent unauthorized access except when an operator is on duty. An attendant shall be on duty at all times while the landfill is open for public use to assure compliance with operational requirements and to prevent acceptance of unauthorized wastes. (paragraph added, 8/6/13 revision)

Sources of Waste

The primary source for waste received at the site is a general contracting company with which Mr. Morris is affiliated. There are no plans to operate the LCID as an "open to the public" facility, however, waste material from sources other than Mr. Morris's company will be considered on a case-by-case basis.

Waste material received by the site is likely to originate in Craven, Carteret, Pamlico, Beaufort, Pitt, Lenoir, and/or Jones Counties.

Volume of Waste

The proposed LCID has an approximate total capacity of 107,500 cubic yards. The volume of material contained in the existing LCID is approximately 52,500 cubic yards, or one-half of the available capacity. Without further consolidation, the remaining capacity of the proposed LCID is approximately 55,000 cubic yards. (paragraph revised, 8/23/13 revision)

The average over-the-road dump truck is estimated to contain 10 cubic yards of material. Based upon 10 cubic yards per truck, the remaining 55,000 cubic-yard capacity will serve an additional 5,500 truckloads.
(paragraph revised, 8/23/13 revision)

If no activity is performed to extend the useful capacity of the site, the remaining capacity will be depleted in 5 years assuming an average of twenty-one 10 cubic yard truckloads per work week are transported to the proposed LCID.
(paragraph revised, 8/6/13 revision)

The usable capacity of the LCID can effectively be increased by employing the use of a screening device to remove soil from and further consolidate the solid wastes already deposited in the LCID. Screening incoming debris to provide clean soil for reuse as topsoil or cover material, and chipping woody debris for reuse as mulch or fuel for the local wood-energy plant can also help reduce the volume of material eventually stored in the disposal area.
(paragraph revised, 8/6/13 revision)

Stockpiles of material prepared for reuse shall not be located on finalized exterior slopes, but can be located within the active portion of the proposed disposal area, and/or outside of the disposal area when located 50-feet away from property boundaries and surface waters, and 25-feet away from any drainage features including ditches. Stockpiles are limited to a size(s) that will not interfere with facility ingress/egress, handling and placement of landfill material. Remaining stockpiles shall be transferred to the disposal area prior to final site closure.
(paragraph added 8/23/13)

Equipment

At a minimum, it is anticipated that an excavator and/or bull-dozer will be used onsite to place, shape, and cover solid waste deposited onsite.

The use of mechanical screening, crushing, chipping, and drying equipment, based upon the receipt of any necessary additional permits, can be employed onsite to prepare materials such as topsoil, concrete, for re-purposed use by landscaping or paving companies, thereby reducing the volume of material ultimately landfilled onsite.

Site Security and Access Control

The LCID property has one road-front entrance accessible by the general public, and a private rear entrance. Both entrances are gated and locked.

(paragraph revised, 8/6/13 revision)

Hours of Operation

As this LCID is not proposed to be operated as an "open to the public" facility, generally speaking, there are no "normal" hours of operation. Mr. Morris will typically require access to the LCID during standard daytime business hours. For other waste generators, the LCID will probably operate on a "by appointment" method to accommodate waste disposal on a case-by-case basis.

(paragraph revised, 8/23/13 revision)

Signs

Signs will be posted at the facility entrances to indicate the facility name, address, permit number, emergency contact phone number and to prohibit trespassing. If public operation is considered, signs indicating the types of waste accepted, types of waste prohibited, hours of operation, and necessary instructions will also be posted.

Road Maintenance

The entrance road is paved with asphalt. Other roads within the LCID site are paved with gravel, while others still are compacted dirt. Maintenance will be performed on all roads as needed to provide safe passage into, through, and away from the site.

Surface Water Control (section revised, 8/6/13 revision)

The original ground surface of the property containing the LCID was relatively flat, at approximately elevation 20. The property and surrounding area sloped downward from east to west, with Sanders Lane immediately to the east and Bachelors Creek approximately 1,400 feet to the west.

The existing and proposed LCID disposal areas are located entirely above ground and constructed in that manner, stormwater run-on will not be an issue.

The LCID disposal area has the potential to discharge two forms of water; stormwater runoff and leachate.

Stormwater runoff will occur whenever rainfall volumes exceed the infiltration capacity of the LCID property. Deposition of waste material is proposed to occur above ground and in a method that prevents standing water. Given the requirements for cover placement, stormwater runoff generated by the waste material stockpile will typically occur after the vegetatively stabilized cover material is saturated. Stormwater runoff generated in this circumstance will flow overland, across the vegetated side slopes and buffers before reaching existing/proposed ditches. Fifty feet-wide vegetated buffers are provided between the proposed disposal area and onsite ditches to provide additional opportunity for infiltration and for sediment removal before runoff reaches the ditches. The existing system of ditches discharges in the southwest corner of the project site and continues westward approximately 1,400 feet before reaching Bachelor Creek.

Leachate, is defined in 15A NCAC 13B.0101 (24) as any liquid, including any suspended components in liquid, that has percolated through or drained from solid waste. By regulatory definition, and as expanded upon in the "types of waste accepted" section of this operation plan, the material allowed to be received by this LCID is divided into two categories; land clearing debris, and inert debris, neither of which pose a threat of contamination to stormwater beyond that of sedimentation. This is supported by 15A NCAC 13B.0103 (i) which reads "after January 1, 1998, all active sanitary landfills (<u>except land clearing and inert debris landfills</u>) shall be equipped with liners, leachate collection systems and final cover systems as required in Sections .0500 and .1600 of this Subchapter," emphasis added. Accordingly, no leachate collection system is proposed at this LCID.

15A NCAC 13B.0566 (14) states that leachate shall be properly managed on site through the use of current best management practices. Because the disposal area is above the original ground surface, stormwater that infiltrates the disposal area can potentially collect above the original ground surface and travel horizontally until it discharges through the surface of the fill slopes. This "leachate" can erode the vegetated earthen material used to cover the disposal area, creating an increased possibility of sediment being transported away from the disposal area within the leachate and stormwater runoff. In order to manage and reduce the effects of this possibility, the operator will inspect the perimeter slopes of the disposal area weekly during active LCID operations (monthly during inactive periods), and after any significant runoff producing rainfall for slope face erosion. Slope failures shall be repaired using uncontaminated earthen material (soil) placed in six to eight inch-thick lifts, compacted, and seeded in accordance with the erosion and sediment control plan. Any sedimentation that has occurred beyond the perimeter of the disposal area shall be removed and returned to the disposal area. Repaired areas shall be inspected weekly until vegetation stabilization is fully developed.

General stormwater permit number SW7050818 was issued to RJ Bushhogging in October 2005 for operation of the LCID. By letter dated July 22, 2013, the Washington Regional Office of NCDENR DWQ transferred that permit to Craven LCID, LLC. A copy of the name/ownership change form and issued permit is provided in the Appendix for additional information.

Wet Weather Operation

(section isolated, 8/6/13 revision)

Under normal conditions, LCID operation is dependant upon the operation of the other companies with which the owner/operator is affiliated. As those companies typically cease operations during inclement weather, it is likely that the LCID will not operate during inclement weather.

Fire Prevention

In accordance with 15A NCAC 13B.0566 (12), open burning of solid waste is prohibited at the LCID.

In accordance with 15A NCAC 13B.0566 (13), the concentration of explosive gases generated by the facility shall not exceed:

a. Twenty-five percent of the lower explosive limit for the gases in facility structures.
b. The lower explosive limit for the gases at the property boundary.

The primary explosive gas produced by an LCID landfill is methane. Methane production occurs as a result of anaerobic decomposition of organic waste. The lower explosive limit of methane is a concentration of five (5) percent by volume in the atmosphere.

Monitoring frequency does not appear to be specifically addressed in the NCAC. The introduction of the NCDENR, DWM, Solid Waste Section, Landfill Gas Monitoring Guidance document, dated November 2010, indicates that 15A NCAC 13B requires "quarterly monitoring of methane and other explosive landfill gases at C&D and other landfills." In accordance with the guidance document, quarterly testing will be performed at the property boundary and within any facility structures (if proposed and constructed in the future) for the presence and level of landfill gases. A record of the date, time and result of the tests shall be maintained with the LCID documents for the life of the facility or the time mandated by permit conditions, if different. A copy of the landfill gas monitoring guidance document is provided in the appendix for reference.

Wet and/or green vegetation should be placed in a manner that promotes drying before landfilling to reduce the possibility of auto-ignition from the heat of decomposition as is common with large mulch stockpiles. A copy of the NCDENR,

DWM, Solid Waste Section issued spontaneous combustion guidance document for disaster debris management is provided in the appendix for reference.

The facility is located in a community that is served by volunteer fire, rescue, EMS, and the County Sheriff's Department all of which can be contacted as needed.

In the event of a fire that exceeds the extinguishing capabilities of the equipment or staff onsite, evacuate the site and call 911 to report the fire.

Earthen material received by the facility that is suitable for future use as cover material should be stockpiled within the footprint of the landfill waste area (see following section "cover material"). Earthen material stockpiled onsite also provides a readily accessible smothering agent for use during firefighting.

(paragraph added, 8/6/13 revision)

File Management

Originals of LCID related permits, inspection reports, correspondence, and operation plans will be maintained at a location chosen by the agent of Craven LCID, LLC.

A copy of all current permits and plans applicable to the LCID operation will be kept onsite for reference.

Cover Material

In accordance with 15A NCAC 13B.0566 (4), adequate soil cover shall be applied monthly, or when the active area reaches one acre in size, whichever occurs first.

Periodic cover placed in compliance with the 0566(4) at an average lift thickness of six (6) inches will require approximately 800 cubic yards of material for every acre being covered.

In accordance with 15A NCAC 13B.0566 (5), 120 calendar days after completion of any phase of disposal operations, or upon revocation of a permit, the disposal area shall be covered with a minimum of one foot of suitable soil cover sloped to allow surface runoff in a controlled manner. The Division may require further action in order to correct any condition which is or may become injurious to the public health, or nuisance to the community.

Final cover placed in compliance with the 0566(5) at an average lift thickness of one (1) foot will require approximately 1,600 cubic yards of material for every acre being covered.

In accordance with 15A NCAC 13B.0566 (7), provisions for a ground cover sufficient to restrain erosion must be accomplished within 30 working days or 120 calendar days upon completion of any phase of landfill development. If requirements contained in the erosion and sediment control or National Pollution Discharge Elimination System (NPDES) permits differ, the permit indicating the shortest time governs. (paragraph revised, 8/6/13 revision)

To avoid the undesired loss of storage capacity within the LCID disposal area, it is recommended to maintain an active area that is less than one acre, with exterior side slopes adjacent to the active area covered and stabilized as completed.

Craven LCID, LLC is affiliated with another company that performs land clearing, grading, excavation, and other site preparation work, and operates surface mines that produce topsoil, sand, and gravel. If insufficient quantities of suitable cover material are generated by the land clearing, grading, and site preparation work, then sufficient cover soils for the LCID can be provided by the mining operations.

Site Closure (section revised, 8/6/13 revision)

Portions of the previously closed notification LCID are located within the 100 feet of the property line. These areas are hatched and labeled on the proposed LCID plan drawing. These areas cannot be part of the new waste disposal area. Vegetatively stabilized soil cover, at the approved slopes, must be maintained on these areas throughout the life of the permitted LCID. Damage and/or erosion of cover material or vegetative stabilization within these areas shall be repaired upon discovery in accordance with the provisions of the issued erosion control plan.

When it is desired to terminate all operations of the LCID, cover material will be installed on all remaining exposed surfaces of the disposal site, with surfaces and slopes graded to promote overland runoff of stormwater. Vegetative ground cover sufficient to restrain erosion will be installed, and allowed to establish. Contact will be made with representatives of the Division of Waste Management, Solid Waste Section to schedule a final inspection and arrange for issuance of a notice of closure.

After a notice of closure is received and the appropriate form (if any) is filed with the Register of Deeds, operation of the LCID is terminated. No additional waste shall be received after closure without applying for and receipt of a permit renewal and/or a new permit. Following closure, the property containing the LCID will be allowed to establish woody and other naturally occurring vegetation.

Unless less stringent requirements are allowed by the issued LCID operation permit or closure notice, post-closure inspections shall be performed of the LCID disposal area for damage and/or erosion of cover material and vegetative stabilization, formation of sinkholes, and slope failures upon the following schedule:

- For the first calendar year following closure, the facility shall be inspected monthly. Beginning the second calendar year following closure, or after two consecutive monthly inspections yield no damages/erosion, whichever occurs last.
- After two consecutive quarterly inspections yield no damages/erosion, the facility shall be inspected semi-annually.
- After two consecutive semi-annual inspections yield no damages/erosion, the facility shall be inspected annually for the remainder of the first five years following closure.

Note: replace missing cover material and/or vegetation, fill sinkholes using uncontaminated earthen fill material, repair slope failures, and remove any sediment deposited downslope resulting from slope failures, upon discovery. Following discovery of sinkholes or slope failures, resume monthly inspections of repaired areas until two consecutive monthly inspections indicate the repairs are stabilized.

Section 4 - Sedimentation and Erosion Control Plan

(section revised, 8/6/13 revision)

The primary sedimentation and erosion control measure proposed for use at the LCID site is fill slopes that change one foot or less vertically for every three feet of horizontal distance (1V:3H, or flatter), stabilized vegetatively with temporary and permanent seeding. As perimeter fill slopes are constructed within the LCID, cover soils will be placed and vegetation planted/seeded to stabilize those slopes.

Check dams are proposed for use in the access ramp ditch. These will be installed as the access ramp is constructed.

An existing paved entrance road will serve to reduce/eliminate any offsite transportation of sediment on vehicle wheels. Any dirt/debris carried onto and deposited on the public roads from the LCID site will be swept and removed from the road as discovered. If necessary, a gravel construction entrance will be constructed on the gravel portion of the entrance road to supplement the tire cleaning capacity of the paved entrance road.

A copy of the financial responsibility/ownership, sedimentation pollution control act form is provided in the Appendix. A copy of the erosion and sedimentation control plan and letter of approval will be provided upon issuance.

Section 5 -Application for 5-Year Permit

Each five-year period of operation requires an application for permit amendment. The following information must be submitted to the Solid Waste Section no less than six (6) months prior to the expiration date of the previous permit to operate to maintain continuous operation of the LCID landfill.

- The general information indicated at the beginning of this document.
- A minimum of two cross sections along each major axis per operational area that shows the current elevations, the proposed excavation, the proposed elevation at the end of the five-year phase of operation and the proposed final elevations. The excavation drawing must show the separation to groundwater and bedrock is at least 4 feet.
- Any updates to the operation plan.
- Letter from local government stating that the LCID complies with local land use and zoning ordinances.

Section 6 - Applicant Signature Page

Name of Facility: CRAVEN LCID

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

Terry D. Morris
Print Name Date

Agent
Title

Craven LCID, LLC
Business or organization name

Appendix (revised, 8/6/13)

- Copy, 15A NCAC 13B.0564 and 13B.0566.
- Copy, NC Department of the Secretary of State website corporation information cover page for Craven LCID, LLC.
- Craven County Deed Book 3193, Pages 218-221.
- Road Map with Approximate Location Indicated.
- Portion of USGS Quadsheet "JASPER" with Approximate Location indicated.
- Copy, Zoning Consistency Letter from Craven County Office of Planning and Community Development.
- Portion of FEMA FIRM Community Panel Number 372 554000J with approximate location indicated.
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- Copy, 2005 Response from NCDENR Natural Heritage Program regarding endangered species, natural and historic sites.
- Copy, Cover letter to NCDENR Natural Heritage Program regarding endangered species, natural and historic sites.
- Copy, 2013 Response from NCDENR Natural Heritage Program regarding endangered species, natural and historic sites.
- Copy, State Stormwater Permit Name/Ownership Change Form for stormwater management permit number SW7050818
- Copy, DWQ Exemption letter, dated July 8, 2013
- Copy, State Stormwater Permit number SW7050818
- Copy, NCDENR, DWM, Solid Waste Section, Landfill Gas Monitoring Guidance, November 2010
- Copy, NCDENR, DWM, Solid Waste Section, Emergency Site/Disaster Management Spontaneous Combustion Guidance Document
- Copy, Financial Responsibility/Ownership Form from erosion and sedimentation control approval submission
- Copy, Erosion and sedimentation control plan and approval (provided after approval is received)

Section 7 - Drawings

- Craven LCID, A Proposed Land Clearing and Inert Debris Landfill located at 356 Sanders Lane for Craven LCID, LLC, prepared by Robert M. Chiles, PE., Rev. 1, 08-06-13

- Section and Isometric Views of the Proposed LCID Topographic Contours for Craven LCID, prepared by Robert M. Chiles, PE., Rev. 1, 08-06-13

- Area Within 1/4 Mile of the LCID Disposal Area Boundary for Craven LCID, prepared by Robert M. Chiles, PE.

From:	Mike Rice
To:	Chao, Ming-tai
Subject:	Re: Permit Application for Craven LCIDLF
Date:	Friday, August 23, 2013 10:39:15 AM
Attachments:	2013030 LCID App Data and Op Plan Rev 8-23-13.pdf

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Dear Mr. Chao:

Apparently I overlooked the remaining capacity when revising the "volume of waste" section during the August 6 revisions. I have corrected the remaining capacity volume to read 55,000 cubic yards.

As suggested, I have added a paragraph to the "volumes of waste" section which discusses the possible locations for stockpiles, and generically limit the size(s) of stockpiles. If the buffers that you indicate are applied, there are locations outside of the disposal area footprint that will accommodate stockpiles. In order to address stockpile duration, I included a requirement that remaining stockpiles shall be incorporated into the disposal area prior to final site closure. Given the solid nature of the material that might be stockpiled, it is not likely that a stockpile will "spoil." If located according to the operation plan, stockpiles will not pose an environmental threat, so any time limit to their duration other than to the working life of the landfill appears to be arbitrary.

By making a few format changes, I was able to limit to two, the number of pages of the operation plan effected by the revisions and added information. The changes occur only on pages 5 and 6 of the document. As the changes are noted with today's date, this effectively changes the revision date on the cover page to August 23, 2013.

I have created and attached a revised pdf of the application data and operation plan for your use. Please print pages 5 and 6, and use them to replace the corresponding pages in the latest hard copies that we submitted to you. As for the revision date on the signed cover, please line through August 6, 2012 and write August 23, 2013.

On a related note, we do not provide copies to the client until after permit approval. Therefore, documents issued to the client will display the correct revision date and include all revisions that are prompted by the regulatory review process.

With respect to your comment about the compliance offer (officer?) - is that something internal to your office, or are you still waiting for information from the project owner or my office?

I spoke with Mr. McClain this morning regarding approval of the erosion control plan. He advised that he has not yet reviewed the revisions submitted to him, but assured me that he would do so and call me later today. Again, we will forward copies of the approved plan and issued approval from the Land Quality Section as soon as we receive it.

Michael

Michael L. Rice, P.E., P.L.S.

ROBERT M. CHILES, P.E.
PO Box 3496
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(252) 637-4702 (ofc)
(252) 637-3100 (fax)

----- Original Message -----
From: Chao, Ming-tai
To: mikerice@robertmchilespe.com
Sent: Wednesday, August 21, 2013 3:04 PM
Subject: FW: Permit Application for Craven LCIDLF

Dear Mr. Rice:

I am sorry to hit the wrong key and sent out the previously e-mail message without my signature.

I am still waiting the Compliance Offer to approve the compliance history review for the site, and after that I can work on the permit. The permit can't be issued until the Erosion and Sediment Control Plan is approved by the NC LQS. Please contact me if you have any questions of the permitting processes.

Best regards,

Ming-Tai Chao, P.E.
Environmental Engineer
Permitting Branch, Solid Waste Section
Division of Waste Management
(Mailing Address)
1646 Mail Service Center
Raleigh, NC 27699-1646
(Street Address)
Green Square, 217 West Jones Street
Raleigh, NC 27603
Tel. 919-707-8251
ming.chao@ncdenr.gov
http://portal.ncdenr.org/web/wm/sw

E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.

From: Chao, Ming-tai
Sent: Wednesday, August 21, 2013 2:57 PM
To: 'Mike Rice'
Subject: RE: Permit Application for Craven LCIDLF

Dear Mr. Rice:

I have found a discrepancy of the "Volume of Waste" (on Page 5 of the Permit Application). The total capacity of the LCIDLF is 107,500 cubic yards (cy) which including the in-place waste volume of 52,500 cy [consistent with the original submittal) and the remaining capacity of the proposed Craven LCIDLF – **54,500** cy. I think this remaining volume is likely 55,000 cy. Please confirm the

remaining volume of the landfill.

After reviewing your responses dated 08/19/2013 I would like point out my purposes for my pervious comments/concerns:

Comment 1.
The recyclables can be stockpiled in the working faces as long as the duration is not violate the cover requirements stated in Rules .0566(4) & (5). I agreed with your approach that the stockpiles can be seated in the location within the permitted waste footprints (about 3.6 acres) but not inside the working faces, and relocate as necessary when the waste fill in progress.

The record of recyclable is optional; your client may use the record to ask for tax or grant if they are available. The record will be the official document for grant or tax deduction applications (However, I can't guaranty anything).

According to previously court ruling, the permit conditions can't be enforceable if the permit conditions don't incorporate the written statements, descriptions, methods, approaches, or measurements in the approved operations plan or if the permit conditions are not required by State, Federal, or local Rules, Laws, or Regulations. If you provide the maximum stockpile amount and duration in the operations plan, as long as it is reasonable, the Solid Waste Section will approved them which will be incorporated into the permit conditions and become a legal-bounding document. So, any responses you think is necessary for the waste operation please put them in the written operations plan.

I have no further comments on your responses 2 & 3.

After you receiving the approval of the Erosion and Sediment Control Plan & permit issued by the NC Land Quality Section, please provide me a copy of the approve letter and permit and any revised portions of the Permit Application.