



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

Pat McCrory
Governor

Donald R. van der Vaart
Secretary

August 13, 2015

Mr. Jon Creighton
Planning & Development Director
46 Valley Street
Asheville, North Carolina 28801

Subject: Engineering Technical Review
Buncombe County C&D Unit
Buncombe County, Permit # 1107-CDLF-1998, Document ID 24857

Mr. Creighton:

The Division of Waste Management, Solid Waste Section (Section) has completed the technical review of the *Permit to Construct CDLF Phase 5 Expansion Area* application (DIN's 24316-24320). The document was submitted on your behalf by McGill Associates and was received in the Asheville Regional Office on May 14, 2015.

Based on this review, the Section requires clarification or additional information in order to complete the permitting activity. Please provide a response to each of the items listed below:
Facility Plan

1. The application cover letter states Section 2.2.8, Table 2-4 of the Facility Plan was updated to include lateral expansion final cover and effect on net soils. However, unlike updated Tables 2-2 and 2-3, there is no row for the Phase 5 Expansion in Table 2-4.

Engineering Plan

2. The application cover letter states Section 2.3 of the Engineering Plan had a paragraph added referencing Ditch 11.3 and Sediment Basin 11. Neither the referenced ditch nor the sediment basin is readily apparent on either Sheet No. EP-2, Erosion and Sedimentation Control Plan, or Sheet No. EP-3, Grading Plan.
3. Rule .0539(d)(3) requires an engineering report that contains a *copy of the Design Hydrogeologic Report prepared in accordance with Paragraph (b) of Rule .0538*. A copy of the Design Hydrogeologic Report was not included in the engineering report.
4. Rule .0539(e)(2) requires the engineering drawings to illustrate *grading plans: proposed limits of excavation, subgrade elevations*. Subgrade elevations were not readily apparent on Sheet No. EP-3, Grading Plan.
5. Rule .0539(e)(4) requires the engineering drawings to illustrate the *cap system: base and top elevations, landfill gas devices, infiltration barrier, surface water removal, protective and vegetative cover, and details*. Base elevations and landfill gas devices were not illustrated on either Sheet No. EP-6, Closure Grading Plan, or Sheet No. EP-9, Closure Details.
6. Cross section drawings that meet the requirements of Rules .0539(e)(6)(A) and (B) were not included with the engineering drawings.

Operations Plan

7. There was nothing found in the Operations Plan indicating the facility will meet the requirements of Rule .0542(1)(5).

Closure/Post-closure Plan

8. The Potential Assessment and Corrective Action (PACA) costs as required by N.C.G.S. 130A-295.2(h1) are not discussed or included in the cost estimates provided.

Review of the Hydrgeologic sections of the application are under review by Mr. Perry Sugg. Additional information regarding these sections will follow under separate cover.

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: Ms. Kristy Smith – Buncombe County
Mr. Mark Cathey – McGill Associates
Mr. Joe Wiseman – Petra Engineering
Mr. Perry Sugg – SWS/RCO