



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

Pat McCrory
Governor

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Secretary

January 23, 2015

Mr. David Brigman
Director: Air Quality & Solid Waste
81 Panther Branch Road
Alexander, North Carolina 28701

Subject: Engineering Technical Review
Buncombe County MSW Landfill
Buncombe County, Permit # 1107-MSWLF-1996, Document ID 22939

Mr. Brigman:

The Division of Waste Management, Solid Waste Section (Section) has completed the review of the document titled *Subtitle D Landfill, Phase IV (Cell 7) Permit to Construct Application (DIN 13037)*. The document was submitted on your behalf by CDM-Smith and was received in the Asheville Regional Office on April 29, 2014.

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. Rule .1619(e)(4)(C)(ii) requires a description of the leachate management system including *capacity of the storage*. No mention of storage capacity was found in the Leachate Management System description in either the Facility Plan or Engineering Plan.

Engineering Plan

2. Rule .1620(e)(4) requires leachate collection system engineering drawings to illustrate *base elevations, piping system grade and inverts, cleanouts, valves, sumps, top of protective cover elevations, and details*. Piping system grades and top of protective cover elevations were not found in the engineering drawings.

Operations Plan

3. Section 2.5, Prohibited Wastes, and Appendix 5B – Waste Screening Plan Section 3.2, Materials Prohibited from MSW Landfilling, do not include the “banned” wastes identified in N.C.G.S. 130A-309.10(f).
4. Section 4, Disease Vector Control states *stagnant ponding water is prevented to control mosquito breeding*. However, as part of the approved Bioreactor project, leachate can be applied to the working face with the use of berms which could lead to temporary ponding. Is there any concern with the leachate application at the working face reducing the efficacy of disease vector control practices?
5. Sections 9.1 through 9.3 discuss drainage control and water protection requirements regarding surface water over/in waste. The requirements discussed in these sections seem to contradict the planned direct application of leachate at the working face as part of the approved Bioreactor project.
6. Section 12.1, Solid Waste Working Area states *at a maximum, the width of the working face shall not exceed 100 feet*. There is no regulatory requirement to limit the width of the working face to 100 feet. However, as this criteria is established in the Operations Plan, the facility will be responsible for ensuring this limit is continuously met.

7. Drawing OP-1 appears to show structures, possibly private residences, within the facility boundary on the east side of the facility.
8. Drawing OP-1 indicates active versus inactive areas within the MSW disposal footprint. However, the same indication is not provided for the C&D disposal footprint.
9. Appendix 5B – Waste Screening Plan Section 3.3, County Regulations states *Medical Waste as defined above is not accepted at the Buncombe County Solid Waste Management Facility's Landfill*. However, medical waste does not appear to be defined in this section.
10. Appendix 5B – Waste Screening Plan Section 9, Random Inspection of Incoming Loads, makes no mention of inspecting loads from the Buncombe County Transfer Station, Permit number 1108T-TRANSFER-1996. Also, as established in document ID 20853 of the approved plan, there is no waste screening at the Transfer Station and the *transfer trucks from the transfer station are inspected regularly at the Buncombe County landfill to ensure prohibited items are not landfilled*. Therefore, it is recommended the inspections of the Buncombe County transfer trucks be specifically discussed in the Waste Screening Plan for the landfill.
11. Appendix 5D – Methane Monitoring Plan Section 3.4.2, Sampling Procedures discusses procedures for sampling for landfill gas in the landfill gas monitoring wells. However, there is no discussion of the procedures for sampling for landfill gas in structures.
12. Appendix 5D – Methane Monitoring Plan Section 4.1, Actions if Regulatory Limits Detected in Structures provides a list of actions to taken if methane gas is detected at, or above, 25 percent LEL. However, the list of actions does not include immediate notification of the Division as required by 15A N.C.A.C 13B .1626(4)(c)(i).
13. Documentation regarding the MW-3 Gas Issue indicated the relocation of groundwater monitoring wells MW-3 and MW-7 has been approved by the Section. Please update Sheet 1 in Appendix 5D – Methane Monitoring Plan to represent current site conditions (new well locations).

Closure/Post-closure Plan

14. There are no Potential Assessment and Corrective Action (PACA) cost estimate as required by N.C.G.S. 130A-295.2(h).

Additionally, as previously communicated in the Notification of Statute Change letter (DIN 22070), in order to continue with the Cell 7 PTC permitting activity, as currently proposed, Buncombe County will need to submit an environmental impact study in accordance with the new requirements of G.S. 130A-295.6(a).

Review of the Hydrologic 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: Mr. Jon Creighton – Buncombe County
Ms. Kristy Smith – Buncombe County
Mr. Kenton Yang – CDM-Smith
Ms. Andrea Keller – SWS/ARO
Mr. Perry Sugg – SWS/RCO