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Backus	10/21/2015	25137	32I-LCID-

North Carolina Department of Environment Quality

Pat McCrory
Governor

Donald R. van der Vaart
Secretary

October 21, 2015

Mr. Allen Currin
Currin Bros. Inc.
1610 Wolfpack Lane
Raleigh, NC 27609

Subject: Permit Amendment Application Review
Currin Landfill #2
Permit No. 32I-LCID-, Durham County, Document ID No. 25137

Dear Mr. Currin:

The Division of Waste Management, Solid Waste Section (Section) received an application for a LCID Landfill for the Currin Landfill #2 (DIN 24934). A technical review of the application has been conducted. Please address the following comments and questions concerning the application. Modify the application where appropriate.

1. Page 2, Siting and Design Standards, Buffers – Text states that development buffers are shown on Figure 1. I believe you may have meant to reference Figure 2 in Attachment D – Operation Manual. Please check.
2. In the “Nationwide Permit” of Attachment C, there is a letter dated October 12, 1988 from the State of North Carolina, Department of Natural Resource and Community Development. The letter is stated to include a copy of a General Water Quality Certification No. 2176. It appears that page(s) of the certification is missing. Please review your records to find the missing page(s).
3. Section 1.6.1 Open Burning in the Operation Manual - The paragraph has been used in other applications, but is confusing because it is contradictory and states something that might only be allowed under very unusual circumstances rather than normal operations.

The first sentence implies that controlled burning of land-clearing debris generated on-site or from emergency clean-up operation is allowed as an exception at the facility, but then states in the next sentence that controlled burning will occur only if permitted or approved by the DWM, the Division of Air (DAQ), and the local fire department.

Open burning of solid waste is clearly not allowed at an LCID landfill per 15A NCAC 13B .0566(12). Please revise so it is clear that there is no exception at this facility for open burning under the LCID landfill permit.

Open burning can be conducting using an air curtain burner at an approved temporary disaster debris management sites according to the Section’s guidance (see emergency/disaster

vegetative and landing clearing debris guidance on the Solid Waste web site). However, the landfill isn't a designated emergency debris disaster site. The facility would have to pursue this designation. For land-clearing debris generated on-site, the facility could need to be permitted by both DWM and DAQ.

4. Section 2. Materials Recovery - Use of processed mulch has been allowed, but is limited to less than six inches. Please make this change.
5. Attachment F - Attachment F is a soil and sub-surface investigation. The report references the site as Permit 32-D, however, the map and property information seem to indicate that the report is for the property of Permit 32-I. To prevent future confusion, I would suggest adding a note at the beginning of the attachment explain that there is an error in the permit reference.
6. Incorrect Permit No. – In Figures 1 and 2 of the Operation Plan and in all the drawings of Attachment H, the permit is referenced as 32-1 rather than 32-I.
7. It is my understanding that the facility has a land disturbing permit (No. 3179) issued by Durham County (5/14/02). Please include a copy in Attachment C.

If you have any questions, please contact me at (919) 707-8257 or by email at pat.backus@ncdenr.gov.

Sincerely,



Digitally signed by Patricia M. Backus,
P.E.
DN: cn=Patricia M. Backus, P.E.,
o=Solid Waste Section, ou=DWM,
email=pat.backus@ncdenr.gov, c=US
Date: 2015.10.21 10:44:52 -04'00'

Patricia M. Backus, P.E., Permitting Engineer
NCDEQ, Division of Waste Management

cc: Madeline German, P.G., Smith Gardner
Ed Mussler, P.E., Permitting Branch Supervisor
Dennis Shackelford, Western District Supervisor
Mary Whaley, Environmental Senior Specialist