

Ritter, Christine

From: Ritter, Christine
Sent: Thursday, January 29, 2015 1:40 PM
To: Garrett, David
Cc: Chao, Ming-tai
Subject: RE: Comments on A-1 Sandrock CDLF Phase 2 PTC, 41-17; DIN 23093

Dave-

To expedite my portion of the review for the above referenced facility, I need the following documents:

A figure or figures from the 2002 PTC application Design Hydro Report illustrating the area of Phase 2 included in the Design Hydro Investigation and Report (there are no figures in the copy of the 2002 Design Hydro Report that I have a copy of);

A figure from the current January 2015 PTC application illustrating that what is currently designated as Phase 2 was covered under the 2002 Design Hydro Report; these two figures, the one from 2002 and the one from 2015, need to be compared to each other to determine that all areas have been adequately investigated for all hydrogeological concerns; An electronic copy of the November 2013 final approved Water Quality Monitoring Plan for the PTO issued for continued operations issued in December 2013;

An electronic copy of the November 2013 final approved Landfill Gas Monitoring Plan for the PTO issued for continued operations issued in December 2013.

Thank you,

Christine Ritter (Christine.Ritter@ncdenr.gov)
Hydrogeologist
NC Dept of Environment and Natural Resources
Division of Waste Management/Solid Waste Section
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From: Chao, Ming-tai
Sent: Monday, January 26, 2015 12:53 PM
To: Garrett, David
Cc: Aja, Deborah; Jernigan, Hugh; Ritter, Christine
Subject: Comments on A-1 Sandrock CDLF Phase 2 PTC, 41-17; DIN 23093

Hi Dave:

On January 15, 2015 the Solid Waste Section (the SWS), the Division of Waste Management (DWM) received an electronic copy of the Permit to Construct (PTC) Application for Phase 2 lateral expansion at the above-referenced landfill. According to the cover letter dated January 13, 2015, the PTC Application is a

supplemental document to the approved Permit to Operate (PTO) Application for Phase 1 of the above-referenced landfill, which is titled:

- *Facility and Operations Plan Update, A-1 Sandrock, Inc. C&DLF (Phase 1) and Processing Facility, Guilford County North Carolina, Solid Waste Permit No. 41-17. Prepared by: David Garrett, P.G., P.E. Received September 05, 2013 and approved by the SWS on November 05, 2013 (DIN 20125).*

The received PTC Application (DIN 22964) includes one-page cover letter, two pages of project narrative, and revised portions to the approved PTO Application (DIN 20125). By this means, A-1 Sandrock Inc. requests the SWS approval for a continuation of the 5-year Permit to Operate for Phase 1 and a Permit to Construct for Phase 2 at A-1 Sandrock C&DLF.

After completing a review of the PTC Application (DIN 22964), the SWS has several comments, they are:

1. Please provide the revised drawings mentioned on the “Revised Sections) which are missing from the PTC Application.
2. Based on previous experience on processing the permits for this facility, the SWS may issue A-1 Sandrock C&DLF one PTC for Phase 2 & two PTOs (one PTO for Phase 2 A and one for entire Phase 2 including 2A & 2B). Therefore, the info related capacity calculations for Cell 2A & 2B (acreage, waste volume/capacity, life expectance, & closure elevations of intermediated cover for each cell) must be clearly described in the Facility Plan section, just like the way for Phase 1 – Cells A through C. The drawings (including cross sections) must clearly delineate the extents for each cell as well [15A NCAC 13B .0537(d) & (e)].
3. (Section 1.3.2, Page 4) The proposed “Permitted Capacity” of 1,086,677 cubic yard (CY) is likely incorrect. The correct one is 1,078,525 CY which sums up Phase 1 capacity (470,332 CY) and Phase 2 capacity (608,193 CY). Please make a necessary correction.
4. The Section 1.3.4 -Soil Volume Analysis, Page 5 of the approved PTO Application (DIN 20125) needs to be revised by including the volume of the periodical/weekly soil cover for operating waste disposal at Phase 2 [15A NCAC 13B .0537(e)(2)].
5. (Table 8A) The CSB quality of 31,218 CY is likely incorrect. According to the Note 2 of the Table 8 A the CSB volume is the sum of VSL volume (29,258 CY) and the volume multiplying a shrinkage factor of 15% ($29,258 * 0.15 = 4388.7$ CY). Please verify and revise the cost estimate for closure and summary in Section 10.
6. (Table 8C) The landfill gas monitoring shall be conducted at quarterly basis [15A NCAC 13B .0544(d)(2)(B)]. Please revise the description.
7. Section 10, Page 87) Phase 2 mentioned in the first sentence of the second paragraph is likely a typo. Please make a necessary correction.

Please send me the required info and respond the comments. I don't know Christine's schedule yet. If she doesn't have any concerns about the Design Hydro Report dated in 2002, we might wrap up the permit review in February. Have a wonderful day.

Ming Chao

Ming-Tai Chao, P.E.
Environmental Engineer
Permitting Branch, Solid Waste Section

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From: Garrett, David [<mailto:DGarrett@scsengineers.com>]
Sent: Wednesday, January 21, 2015 3:55 PM
To: Chao, Ming-tai
Subject: Re: A-1 Sandrock CDLF Phase 2 PTC

Thanks. I'm glad to hear from you.

David Garrett PG PE
SCS Engineers Raleigh
Tel. 919-418-4375

"Chao, Ming-tai" <ming.chao@ncdenr.gov> wrote:

Hi Dave:

I will be the Engineer to review the PTC-Phase 2A for A-1 Sandrock CDLF, which was logged and scanned to the document tracking system with a DIN 22964. I can't speak for Christine, but it is evidently the design hydro report & environmental media sampling/monitoring plan are not included in this PTC application. You will have to deal with her later.

There is no review fee for this PTC- Phase 2A application because the permit amendment fee -\$9,000 (for one 5-yr PTO-Phase 1 & PTC for a future phase) has been paid in 12/14/2013. But A-1 Sandrock has to pay the permit modification fee in the amount of \$1,500 when the PTO-Phase 2A is requested.

Please contact me if you have any question of the permit processes. Have a wonderful day.

Ming Chao

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From: Mussler, Ed
Sent: Wednesday, January 21, 2015 1:04 PM
To: Chao, Ming-tai
Subject: FW: A-1 Sandrock CDLF Phase 2 PTC

I believe A-1 is yours?

Ed

From: Garrett, David [<mailto:DGarrett@scsengineers.com>]
Sent: Thursday, January 15, 2015 8:46 AM
To: Mussler, Ed
Subject: A-1 Sandrock CDLF Phase 2 PTC

Ed, please see the attached application per earlier discussions. Please contact me with any questions or concerns.

Thank you, in advance.

G. David Garrett, PG, PE

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