



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

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August 14, 2014

Mr. Ron Vail, Engineering Department Manager
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Subject: Approval – Revised Operations Plan
White Oak MSW Landfill Facility
Haywood County, Permit #4407-MSWLF-1993, Document ID No. 21529

Mr. Vail:

The Division of Waste Management, Solid Waste Section (Section) has completed a review of the revised *Operations Plan, White Oak MSW Landfill, MSW Phase 1-3* (DIN 21329). The document was revised to resolve a Notice of Violation. The document was received in the Asheville Regional Office on June 23, 2014.

Based on this review, the Section finds the revised Operations Plan satisfies the requirements of the Notice of Violation and 15A NCAC 13B.1625. Therefore, the revised Operations Plan is now part of the approved plan for the facility and must be maintained on site. The revised Operations Plan will not be listed in the Permit to Operate until the next permitting activity.

However, as part of this review, some discrepancies have been identified and some questions raised about a number of items in the Operations Plan. The Section recommends revising the Operations Plan in the future to eliminate or clarify the following discrepancies and questions:

1. The second paragraph on page 6 states the *County also operates a 4.8-acre Land Clearing and Inert Debris Landfill (LCID)*. An LCID has been permitted for construction and operation, however, the unit has not been constructed and the pre-operational conditions in the Permit have not been met.
2. The sixth paragraph on page 7 states *See Section 2b for requirements of the Alternate Daily Cover tarp and soil/mulch material*. However, Section 2 discusses waste filling practices while Section 3 discusses cover material requirements.
3. The second paragraph on page 8 and Section 8, Erosion and Sedimentation Control Requirements, part c., state *Provisions for a vegetative ground cover sufficient to restrain erosion will be accomplished within 15 calendar days upon completion of any phase of landfill development*. This is not a Solid Waste requirement, however, since it is stated in the Operations Plan the Field Operations Branch inspector can hold the facility accountable for this requirement.
4. Section 1, Waste Acceptance and Disposal Requirements, part b., states *Typically the landfill is open Monday through Saturday from 7:30a.m. to 3:30p.m. However, the landfill may accept waste*

24 hours a day, 7 days per week. As a reminder, an individual certified in landfill operations must be on-site during all cooperating hours of the facility.

5. Section 1, Waste Acceptance and Disposal Requirements, part c., provides a list of wastes prohibited from disposal at the MSWLF. The list does not include all banned wastes listed in G.S. 130A-309.10(f).
6. Section 1, Waste Acceptance and Disposal Requirements, part g., states *Haywood County will continue a program at the Landfill for detecting and preventing the disposal of hazardous and liquid wastes.* The detection program should include all prohibited wastes including those banned wastes listed in G.S. 130A-309.10(f).
7. Section 3, Cover Material Requirements, discusses the various types of daily cover used at the facility. Given the different requirements for the different types, the Section recommends the use of daily log to ensure all cover material requirements are being met.
8. Section 5, Explosive Gases Control, part b., states *Haywood County will implement a routine methane monitoring program to ensure that the standards of 4 (a) are met.* Section 4 discusses disease vector control.
9. Section 5, Explosive Gases Control, part c., states *If methane gas levels exceeding the limits specified in 4 (a) are detected, the owner or operator will:.* Section 4 discusses disease vector control.
10. Section 12, Spreading and Compacting Requirements, part b., states *subsequent lifts can be placed up to final grades.* However, Section 2, Waste Filling Practices, part b., states *To compensate for anticipated settlement the initial placement of waste may exceed the fill grades for the top of waste by up to five feet (5') on the outer slopes and top of fill surfaces.*
11. Appendix 3, Explosive Gas Control Plan, references a Figure 1 and 2. However, there are no figures presented in the plan. These Figures must be available for review by the Field Operations Branch inspector at any time.
12. Appendix 3, Explosive Gas Control Plan, states *Observations will be recorded on the aforementioned "Landfill Gas Measurements Field Worksheet, White Oak MSW Landfill, Haywood County, North Carolina" form.* There is no form provided in the plan. This form must be available for review by the Field Operations Branch inspector at any time.
13. Appendix 3, Explosive Gas Control Plan, states *If methane gas is detected above 25% of its lower explosive limit (25% LEL) in any structure, excluding gas control or gas recovery system components, the detection instrument will be recalibrated in accordance with the manufacturer's instructions and the structure resampled.* The final paragraph then states *If methane gas is detected beyond 25% of its lower explosive limit in any structure, check the calibration of the monitor and resample.* The first statement indicates the unit will be recalibrated, the second statement indicates the calibration will be verified.
14. Appendix 4, Operations Plan Mulching and Grinding Treatment and Processing discusses the procedures for the stated activity. However, this stated activity is not mentioned anywhere else in the Operations Plan.
15. Appendix 4, Operations Plan Mulching and Grinding Treatment and Processing, Section III, Operations Procedures, part A. Overview, states *A description of the procedures used for creating the soil/mulch ADC are included in Section 2(b) of the White Oak MSW Landfill Operations Plan.* However, Section 2 discusses waste filling practices while Section 3 discusses cover material requirements.
16. Appendix 4, Operations Plan Mulching and Grinding Treatment and Processing, Section III, Operations Procedures, part C. Technical Operational Requirements, item 3), states *Mulched materials will be removed from the site several times a week.* However, there is a large stockpile of material on-site and no indication any material has been removed.

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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. Stephen King – Haywood County
Ms. Andrea Keller – SWS/ARO