

March 4, 2015

Ms. Donna Wilson
Environmental Engineer
NCDENR - Division of Waste Management
1646 Mail Service Center
Raleigh, NC 27699-1646

**RE: Johnston County MSW Landfill (Permit No. 51-03)
Permit Amendment Application
Response to Review Comments**

Dear Ms. Wilson:

On behalf of Johnston County, Smith Gardner, Inc. (S+G) would like to respond to the comments in your email dated and received by S+G via email on January 9, 2015 (see **attached**). All comments are repeated below in *italics* followed by our response in **bold**.

1. *Facility and Engineering Plan - The text or the table should note why the gross capacity has increased from the last approved application, Jan. 2009, and state the amounts of increase.*

Table 2.1 has been revised to note the change in gross capacity. See Note 2.

2. *Appendix A (Calculations) of the Facility & Engineering Plan is missing the Quantity Calculations - Capacity and Earthwork Quantities.*

These calculations were inadvertently omitted from the final pdf copy. The revised Facility and Engineering Plan includes these calculations.

3. *(Attachment D - Operations Manual) Section 2.4.7 - Intermediate Cover - For Phase 5, the text should address how the owner or operator has taken and will continue to take all steps necessary to prevent threats to human health and the environment from the unclosed unit.*

Section 2.4.7 is focused on intermediate cover alone. However, note that the thickness of intermediate cover on the Phase 5 MSW landfill unit exceeds the noted minimum of 12-inches. Actual thicknesses are thought to be closer to 2-feet based on prior work conducted at the site.

In addition to the well-vegetated intermediate cover and routine mowing and visual inspection noted in Section 2.4.7 for Phase 5, other sections of the Operations manual discuss other measures that prevent threats to human health and the environment. These include:

- Section 3.2.1.2 (Collection Pipe Cleanout): LCS piping in Phase 5 is routinely flushed and inspected.
 - Section 3.3 (Water Quality Monitoring Plan): Reference is made to the current water quality monitoring plan which includes several wells around the Phase 5 unit.
 - Section 3.4.1 (LFG Management - MSWLF Units): The Phase 5 unit has an active LFG collection system in place.
 - Section 3.11 (Leachate Seeps): This section lists measures to correct leachate seeps in addition to noting that French drains have been installed in the Phase 5 unit.
4. *(Attachment A - General Information) Both MSW and C&D application - On the property information table, Deed Book 2190 should be Deed Book 2109. Also for parcel #3, Deed Book 952, page 375 should be page 374.*

Attachment A (General Information), common to both applications, has been revised accordingly.

5. *Please update the MSW drawings for the property boundary changes and deed references.*

The drawings have been revised accordingly.

Please find attached revised documents reflecting the changes described above. Please contact us at your earliest convenience if you should have any questions or comments on this submittal.

Sincerely,
SMITH GARDNER, INC.



Pieter K. Scheer, P.E.
Vice President, Senior Engineer
pieter@smithgardnerinc.com



Attachments: DWM Comments (January 9, 2015 Email)

Enclosure: Revised Permit Amendment Application Attachments:

Attachment A	General Information
Attachment B	Facility and Engineering Plan
Attachment H	Permit Drawings

cc: Rick Proctor, Johnston County