



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

Pat McCrory  
Governor

Donald R. van der Vaart  
Secretary

August 26, 2015

Mr. Chris Stahl  
Solid Waste Director  
109 Sierra Drive  
Franklin, NC 28734

Subject: Engineering Technical Review  
Macon County MSW Landfill  
Macon County, Permit # 5703-MSWLF-1992, Document ID 24905

Mr. Stahl:

The Division of Waste Management, Solid Waste Section (Section) has completed the technical review of the *Permit Renewal Existing Phase 2 / Permit to Construct Phase 3 Cell 1* application (DIN's 24487-24489). The document was submitted on your behalf by McGill Associates and was received in the Asheville Regional Office on June 5, 2015.

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(d)(1) states *two drawings which plot site development shall be prepared on a topographic map representative of existing site conditions*. It was unclear, based on the title of each drawing sheet, which two drawings were specific to Site Development.
2. Rule .1619(d)(1) states *the map shall locate the physical features referenced in Rule .1622 of this Section*. Sheet number C-101, Overall Site Plan, delineates floodplain and wetlands, but isn't clear regarding the other location restrictions listed in Rule .1622.
3. Rule .1619(d)(3)(B) requires facility plan drawings to include *size, location, and general grade for the leachate piping system, including on-site pipelines to leachate management facilities*. Sheet C-104, Cell 1 Drainage Layer Grades & Leachate Collection System, provides all required information for the leachate piping system except pipe size.
4. Rule .1619(e)(1)(B) requires the facility plan report include a discussion of the characteristics of the wastes received that includes *average monthly disposal rates and estimated variance*. No monthly disposal rates or variances were found in the facility plan report.
5. Rule .1619(e)(1)(D) requires the facility plan report include a discussion of the characteristics of the wastes received that includes *procedures for segregated management at different on-site facilities*. No discussion of segregated waste management was found in the facility plan report.
6. Rule .1619(e)(4)(C)(iii) requires the facility plan report include a description of the leachate management system including *final disposal plans and applicable discharge limits, including documented prior approval of the waste water treatment plant which*

*may be designated in the plan.* This required information was not found in the facility plan report.

Engineering Plan

7. Rule .1620(d)(1) requires an engineering report include an analysis of the facility design that conforms to *the standards for the leachate storage facilities set forth in Rule .1680.* There was no analysis of the leachate storage facilities found in the engineering plan.

Construction Quality Assurance Plan

8. Rule .1621(b)(4) states *progress and troubleshooting meetings, daily and monthly, must be addressed in the plan and the contents of the meetings must be documented.* Information regarding daily and monthly progress meetings was not found in the CQA plan.

Operations Plan

9. Section 9.3, Discharge of Pollutants, in the Operations Plan states *water quality management plan that has been approved under Section 208 or 219 of the Clean Water Act.* The actual Rule citation, Rule .1626(8)(e)(ii), refers to Section 208 or 319 of the Clean Water Act.

Closure/Post-closure Plan

10. Rule .1627(c)(3)(A) states *post-settlement surface slopes shall be a minimum of five percent.* No discussion of minimum grade on post-settlement slopes was found in the closure/post-closure plan.
11. Rule .1627(c)(4) states *an owner or operator shall notify the Division that a notice of the intent to close the unit has been placed in the operating record.* Section 3.1, Notification of Division of Solid Waste, states Macon County will notify the Division of the intent to close, but does not mention adding the notice to the operating record.
12. The Potential Assessment and Corrective Action (PACA) costs as required by N.C.G.S. 130A-295.2(h) are not discussed or included in the cost estimates provided.

If you should have any questions regarding this matter please contact me at (828) 296-4703, or by email at [allen.gaither@ncdenr.gov](mailto:allen.gaither@ncdenr.gov) .

Sincerely,



Allen Gaither  
Environmental Engineer

Cc: Mr. Mark Cathey – McGill Associates  
Mr. Jeff Bishop – McGill Associates  
Mr. Scott Burwell – McGill Associates  
Ms. Elizabeth Werner – SWS/RCO