



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

Pat McCrory  
Governor

Donald R. van der Vaart  
Secretary

Solid Waste Section

August 04, 2015

Mr. Andy Davis  
Solid Waste Director  
Wilson County  
P.O. Box 1728  
Wilson, North Carolina 27894

Re: Comments on the Permit Amendment Application for Continued Operations  
Wilson County Westside C&DLF, Wilson County, North Carolina  
Permit No. 9809-CDLF-, Doc ID No. (DIN) 24815

Dear Mr. Davis:

On June 24, 2015 the Division Waste Management (DWM), Solid Waste Section (SWS) received the Permit Amendment Application for requesting an approval for continued operations of the Wilson County Westside Construction and Demolition Debris Landfill (C&DLF), which is titled as:

- *Permit Amendment Application, Wilson County Westside C&D Landfill Facilities (Permit # 98-09) Continued Operations, Wilson County, North Carolina. Dated June 2015 and prepared by Bartlett Engineering and Surveying, Inc. in Wilson, NC. (DIN 24603).*

The SWS has completed a review of the engineering portion of the Permit Amendment Application, and has several comments on the application document below. Your timely responses to the comments will expedite the completion of the reviewing processes.

Attachment A - Facility & Engineering Plan

1. (Section 2.5) The Black Creek Road Transfer is operated under the Solid Waste Management Permit Number 9808T- Transfer-2000, not 98-09. Please correct this typographic error.
2. Table 1 (on Page 6) shows that the remaining service life for the C&DLF is 2.7 years which is inconsistent with the data (2.5 years) presented in Section 3.1 and the calculation sheet titled as “ Westside C&D Landfill Capacity & Service Life.” Please clarify

Attachment D - Operations Plan

3. (Section 1.1) Phases of Operation for this Permit Amendment Application should include the remaining Phase 2 and new Phase 3, the vertical expansion over the Phase 2. For your reference, the table below summary the phases of operation according the data provided in

the Permit Amendment Application. The intermediate and final fill elevations for each phase must be consistent with the submitted drawings including the cross-sections drawing. Please revise/update the section accordingly.

Phase	Waste Footprint (Acre)	Approved Gross Capacity (CY)	Operating Capacity (CY)	Estimate Service Life (Year)	Note
1	10.5	187,000	187,000	NA	Filled
2	Vertical Expansion	134,600	121,500 <sup>(1)</sup>	NA	Filled
2			13,100 <sup>(1)</sup>		Remaining capacity
3	Vertical Expansion	111,960	111,960	2.7	To be operated
Total	10.5	433,560	433,560 <sup>(2)</sup>		

Notes:

(1) The breakdown of Phases 2 operating capacity (filled and remaining volume) is based on the in-place waste volume of 308,500 CY (in Section 2.3, Page 1) and the approved capacity.

(2) The Operating Capacity of the Phase 3 includes the volume of the proposed final cover system.

4. (Section 1.4.1) For the past 5 years, did the landfill unit accept any asbestos wastes or inert debris for disposal & landfilling? If it did, please provide the additional info below:
  - a. What is the total capacity, in-place waste volume (based on the latest survey on March 28, 2015) and the remaining capacity of this landfill unit?
  - b. The Figure 5 should be updated according to the disposal records and latest survey data.
5. (Section 1.4.3, Key Personnel, on Page 5) The phone number to contact Ben Barnes has been changed to 252-236-4453. Please make the correction in this section.

Attachment E – Closure and Post-Closure Plan

6. (Tables 3-1 & 3-2) The costs for closure and post-closure cares are based on dollar value in the year 2010, not the 2015 dollar values. The new costs should be calculated by using the 2010 dollar value as the base cost multiplying the annual inflation factor from 2012 through 2015 which can be found in the SWS web site at <http://portal.ncdenr.org/web/wm/sw/financialassurance>

The examples of the new costs for closure (\$612215.47) and 30-yr post-closure care (\$686611.48) are illustrated below. If the County agrees the amount of each cost, please show the calculations and final amount in the “note” field without change the cost tables.

Fiscal Year	Closure Cost	Inflation Factor	Closure Cost	Note
2011	\$572,304	1	\$572304.00	approved in 1/25/2011
2012		1.021	\$584322.38	

2013		1.018	\$594840.19	
2014		1.015	\$603762.79	
2015		1.014	<b>\$612215.47</b>	

Fiscal Year	30-yr Post-Closure Cost	Inflation Factor	Closure Cost	Note
2011	\$641,850	1	\$641850.00	approved in 01/25/2011
2012		1.021	\$655328.85	
2013		1.018	\$667124.77	
2014		1.015	\$677131.64	
2015		1.014	<b>\$686611.48</b>	

7. (Section 3) Pursuant to NCGS 130A-295.2 (h1), the County must provide financial assurance (FA) mechanism which is sufficient to cover a minimum of one million dollars (\$1,000,000) in costs for potential assessment and corrective action (PACA) at the facility. This FA requirement for PACA is in addition to the financial responsibility requirements for site closure and post-closure cares. Please add a sub-section to discuss how the County will be in compliance with the additional FA requirements. Additionally the FA mechanism including the costs for site closure, post-closure cares, and PACA must submit the SWS for an approval prior to issuing the County a new Permit to Operate.

Attachment I - Solid Waste Management Facilities

8. Please provide additional information or clarify some concerns below:
- (Section 1.0) The Attachment G doesn't include a Drawing S1 – Facility Site Plan, but the attached Overall Map with aerial photography is likely the Facility Plan drawing. Please clarify.
  - (Section 1.0) Please provide a copy of the zoning compliance letter, which is mentioned in this section but not included in the Permit Amendment Application.
  - (Section 1.5) The Facility Compliance Inspection Report dated August 26, 2013 recorded that white goods are directly hauled to Foss Recycling in Wilson, but a different contractor contact info is stated in the section. Please clarify.
  - (Section 1.7) Please provide the cross-reference – Section 4 that details the operations of Tear-off Asphalt Shingles for Recycling.
  - (Section 1.8) Please provide the cross-reference – Section 5 that details the operations of Comingled Recycle Storage/Transfer Building.
9. (Section 3.5.1) Please provide a soil laboratory test results and a soil boring/test pit log to demonstrate that requirements stated in the section and Rule 15A NCAC 13B .1404(a) (10)

(B) & (D) are achieved. [Referring the Pre-Operation Permit Condition No. 16.g. (DIN 12570)].

Attachment G – Permit Amendment Drawings

10. Figure 3A title – Wilson County Landfill Westside C&D Unit “Cross Sections” is likely incorrect. Please clarify.

11. Figure 5 (referring Comment No. 3) Has this landfill unit been inactive since April 2010? If not, what is the in-place waste volume/fill elevations measured as of March 28, 2015?

Please provide the SWS

(1) A hard copy of the written responses to the above-mentioned comments, the revised portions of the Permit Amendment Application, and the requested supplemental documents.

(2) An electronic copy of the entire revised Permit Amendment Application in pdf format.

The SWS is appreciating your cooperation by promptly providing the above-requested information and/or clarification.

Sincerely,



Ming-Tai Chao, P.E.  
Environmental Engineer  
Division of Waste Management, NCDENR

cc:

Robert S. Bartlett, P.E. Bartlett Engineering and Surveying, Inc.

Jonathan Meade, Bartlett Engineering and Surveying, Inc.

Ed Mussler, Permitting Branch Supervisor

Christine Ritter, DWM

Ben Barnes, DWM

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