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Backus	02/17/2016	25626	2608-CDLF-1998

PAT MCCRORY

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February 16, 2016

Mr. Sid Williamson
Fort Bragg C&D Landfill
Bldg #3-1137 Butner Road
Directorate of Public Works
Fort Bragg, NC 28310

Subject: Permit Application Completeness and Review
Fort Bragg C&D Landfill
Permit 2608-CDLF-1998, Cumberland County, Document ID No. 25626

Dear Mr. Williamson:

The Division of Waste Management, Solid Waste Section (Section) has received your permit amendment application for the Fort Bragg C&D Landfill. The application was submitted on your behalf by HDR Engineering, Inc. of the Carolinas (DIN 25543 and 25544) and received on January 25, 2016. This letter is to notify you that the application is considered complete within the context of North Carolina General Statute (NCGS) §130A-295.8(e) and to provide a review of the application.

A determination of completeness means that the application includes all required components but does not mean that the required components provide all of the information that is needed for the Section to make a decision on the application. Under NCGS §150B-3, when an applicant makes a timely and sufficient application for issuance or renewal of a permit, the existing permit does not expire until a final decision on the application is made.

The following are comments and/or questions concerning the review of the submittal.

1. The cover letter states that the submittal is an application for Phase III Construction and Phase II Closure. A permit for closure is issued after the closure of an area is completed and the certification report is approved. The permit for closure includes the conditions of closure such as maintaining the cap integrity, conducting ground water monitoring, etc.

In accordance with 15A NCAC 13B .0543 (d), a closure plan must describe all the steps necessary to close all C&DLF units at any point during their active life. The permit to construct application for Phase II included a closure plan and the associated elements required for construction of the closure system. It is one of the approved documents listed in the facility permit, therefore, the closure for Phase II is already approved. If you decide to close differently than was approved, for example, using an alternative cap system or changing the specifications, you should submit that modification for approval prior to

implementing closure. Otherwise, you are required to notify the Section when you intend to close a unit according to the approved plan.

2. The facility plan included an estimate of the remaining capacity of the landfill and included an adjustment for a change in the design of Phase III. It did not include the approved gross capacity for each phase of the development. The gross capacity is an important value that is used in annual capacity report and for evaluating whether a change constitutes a substantial amendment under NCGS §130A-294 (b1)(1). I could not find the gross capacity for each phase of the landfill which should be in the facility plan [15A NCAC 13B .0537 (e)(2)(B) and set forth for landfills existing prior to January 1, 2007 in 15A NCAC 13B .0547 (3)(a)]. I consulted with Tom Yanoschak of HDR to develop the following capacity table that will be included in the permit amendment.

Phase	Area (acres)	Gross Capacity (yd ³)	Remaining Capacity (yd ³)	Status
I	15.7	974,700	0	Partial closure of 10.34 acres. (DIN 19386)
II	6.03	530,100	92,100	Approved for operation PTO. (DIN 21606)
III	6.11	477,100	477,100	PTC Application
IV	13.71	581,500	581,500	Future development
Total	41.55	2,563,400	1,150,700	

3. A new riprap-lined perimeter channel was installed on the north side of the landfill without notification or approval of the Section.
 - a. A portion of the channel appears to be over an unclosed area of Phase I. See G-6 area of sheet C-002. Please address how this will affect closure of this area.
 - b. It appears that the channel was placed over gas probe, GP-8. See F-3 area of sheet C-001. The relocation of this probe was not addressed in the application nor separately to the Section. The permitting hydrogeologist for this facility, Elizabeth Werner, should be contacted concerning, and prior to relocation, of the probe.
 - c. The channel was placed over the outer edge of footprint of Phase IV designated in the previous approved facility development plan. Please address how this will affect the development and closure of Phase IV. (Closure drawings were presented in DIN 13683).
 - d. The channel is very close to MW-10. Please verify with hydrogeologist that this does not interfere with groundwater monitoring.
4. In the area of sheet C-001 that show the proposed recycling expansion area there is a notation “(See Note 4)”. I believe this was accidentally transferred to subsequent sheets in error. Please check.

5. It is mentioned that the proposed recycling area will be graded and erosion and sediment control features, including a sedimentation basin, installed. Final plans for the recycling area should be submitted to the Section for review prior to developing the area. The location of the monitoring wells, and care to not damage these wells, must be emphasized when planning and performing the work.
6. The proposed recycling area contains MW-3S and MW-3. Please verify with hydrogeologist that this does not interfere with groundwater monitoring.
7. Closure may also be required prior to the final receipt of waste at the facility. These conditions are specified under 15A NCAC 13B .0543 (c) and should be addressed in the closure plan.

If you have questions, please contact me by email at pat.backus@ncdenr.gov or by phone at (919) 707-8257.

Sincerely,

Patricia Backus, P.E., Environmental Engineer
Division of Waste Management, NCDEQ

cc: Audrey Oxendine, Directorate of Public Works, Fort Bragg
Tom Yanoschak, PE, HDR Engineering
Ed Mussler, P.E., Permitting Branch Head
Jason Watkins, Field Operation Branch Head
Drew Hammonds, Environmental Senior Specialist
Elizabeth Werner, Permitting Hydrogeologist