

Scanned By	Date	DOC ID	Permit
Backus	12/08/2015	25367	32I-LCID-1995

December 7, 2015

Ms. Pat Backus, P.E.
Permitting Engineer
NCDEQ, Division of Waste Management
1646 Mail Service Center
Raleigh, NC 27699-1646

**RE: Permit Amendment Application -
Currin Landfill #2 (SWS Permit No: 32I-LCID)
Durham, North Carolina**

Dear Pat:

This letter is provided as a record of email correspondence regarding the Currin Bros., Inc. LCID permit application for their Landfill #2 in Durham. The following responses (**bold**) correspond to your November 25, 2015 email comments, presented in *italics*.

In the corrections, I noticed that the drawing reference under Siting and Design Standards, Buffers on page 2 is still incorrect. There is not a Figure 1 in Attachment H. There is a Sheet 1, but it is the cover sheet for the set of drawings which doesn't show buffers. The buffers are shown on Figure 2 in the Operation Plan (Attachment D) and on several sheets in set of site drawings in Attachment H. Please correct this.

A revised page 2 was emailed to Pat November 30, 2016. A copy is included here as an attachment.

Please provide a set of revised drawings that I can place in our paper copy.

A set of full sized drawings was delivered to the NCDEQ office on November 30, 2016.

Also, I did not see a service area listed in the application. The previous permit had only Durham County listed so this is the way I will write the permit unless you let me know otherwise.

Although not required, the permit application does not list a service area because Currin Bros, Inc. does not restrict LCID waste based on the source area.

Ms. Backus
December 7, 2015
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Please contact us with comments or questions at 919-828-0577 or by email below.

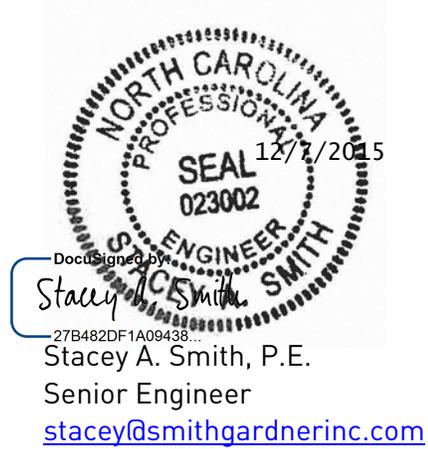
Sincerely,
SMITH GARDNER, INC.



Madeline German, P.G.
Project Geologist
madeline@smithgardnerinc.com

Attachments: Corrected Page 2

cc: File



PROPERTY DESCRIPTION

The table below lists the property owners and the deed book references for the landfill facility. The continuing development does not impact any additional properties. Legal descriptions are included in **Attachment B**.

Landfill Property Owners:

Property Owner	Deed Book Reference	Deed Book Page Reference	Area (acres)
Currin Bros. Inc.	1969	204-206	62.948

APPLICATION REQUIREMENTS

The following sections correspond with the permit application for a LCID facility as outlined in the *Application Guidance for LCID Landfill Permit*.

Local Government Approval

The site is zoned as Residential Rural (RR) or Residential Suburban-20 (RS-20) according to the Durham County GIS/Durham Unified Zoning Ordinance (UDO), and is located in a generally rural residential area. Copies of the original zoning approval letters are included in **Attachment C**. The proposed landfill activities are allowed under this approval.

Operations Manual

The Operations Manual outlines and describes protocols for facility operation and maintenance and was prepared to provide Landfill personnel with a clear understanding of how the Design Engineer assumed that the completed facility would be operated. Along with the Project Drawings, the Operations Manual has been prepared to comply with the requirements of *15A NCAC 13B.0566*. A copy of the Operations Manual is included in **Attachment D**.

Siting and Design Standards

The following sections explain how the LCID facility complies with siting and design standards in *15A NCAC 13B.0564*.

Buffers

Development buffers were satisfied during initial site permitting¹, and are shown on **Existing Conditions, Sheet 2 in Attachment H**. Landfill development is outside these buffers. The facility will only accept Land Clearing and Inert Debris materials.

¹ Permit to Operate (Area 1 & 3), 32-I-LCID, March 22, 1995.

November 11, 2015

Ms. Pat Backus, P.E.
Permitting Engineer
NCDEQ, Division of Waste Management
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

**RE: Permit Amendment Application
Currin Landfill #2 (SWS Permit No. 32I-LCID)
Durham, North Carolina**

Dear Ms. Backus:

On behalf of Currin Bros, Inc., Smith Gardner, Inc. (S+G) would like to respond to the comments received by S+G on October 21, 2015 (see attached). Your comments are repeated below in *italics* followed by our response in **bold**.

1. Page 2, Siting and Design Standards, Buffers – Text states that development buffers are shown on Figure 1. I believe you may have meant to reference Figure 2 in Attachment D – Operation Manual. Please check.

The drawing reference has been updated to more clearly direct the reader to Attachment H, Figure 1.

2. In the “Nationwide Permit” of Attachment C, there is a letter dated October 12, 1988 from the State of North Carolina, Department of Natural Resource and Community Development. The letter is stated to include a copy of a General Water Quality Certification No. 2176. It appears that page(s) of the certification is missing. Please review your records to find the missing page(s).

The missing page has been inserted into the Nationwide Permit Section of Attachment C.

3. Section 1.6.1 Open Burning in the Operation Manual - The paragraph has been used in other applications, but is confusing because it is contradictory and states something that might only be allowed under very unusual circumstances rather than normal operations.

The first sentence implies that controlled burning of land-clearing debris generated on-site or from emergency clean-up operation is allowed as an exception at the facility, but then states in the next sentence that controlled burning will occur only if permitted or approved by the DWM, the Division of Air (DAQ), and the local fire department.

Open burning of solid waste is clearly not allowed at an LCID landfill per 15A NCAC 13B

.0566(12). Please revise so it is clear that there is no exception at this facility for open burning under the LCID landfill permit.

Open burning can be conducting using an air curtain burner at an approved temporary disaster debris management sites according to the Section's guidance (see emergency/disaster vegetative and landing clearing debris guidance on the Solid Waste web site). However, the landfill isn't a designated emergency debris disaster site. The facility would have to pursue this designation. For land-clearing debris generated on-site, the facility could need to be permitted by both DWM and DAQ.

Section 1.6.1 Open Burning in the Operations Manual has been replaced with the following statement to clarify what is allowed under the LCID landfill permit.

"Open burning is not allowed at the facility in accordance with 15A NCAC 13B .0566(12). Controlled burning will occur only if permitted or approved by the DWM, the Division of Air Quality (DAQ), and the local fire department."

4. Section 2. Materials Recovery - Use of processed mulch has been allowed, but is limited to less than six inches. Please make this change.

Section 2.7 Materials Recovery in the Operations Plan has been updated to reflect not more than 6" on processed mulch is allowed.

5. Attachment F - Attachment F is a soil and sub-surface investigation. The report references the site as Permit 32-D, however, the map and property information seem to indicate that the report is for the property of Permit 32-I. To prevent future confusion, I would suggest adding a note at the beginning of the attachment explain that there is an error in the permit reference.

The original email correspondence between Brian Wootton (NCDENR) and John A.K. Tucker, P.E. (Consulting Engineer) has been added at the front of this Appendix to help clarify the incorrect permit number reference.

6. Incorrect Permit No. - In Figures 1 and 2 of the Operation Plan and in all the drawings of Attachment H, the permit is referenced as 32-1 rather than 32-I.

The permit number has been corrected on Operation Plan Figures 1 and 2 to read 32-I.

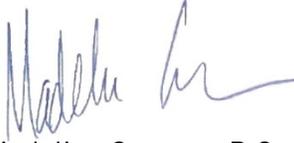
7. It is my understanding that the facility has a land disturbing permit (No. 3179) issued by Durham County (5/14/02). Please include a copy in Attachment C.

The land disturbing permit (No. 3179) was referenced in the June 27, 2013 site inspection report by John Patrone. But the actual permit could not be located; therefore is not included in Attachment C.

Ms. Backus
November 11, 2015
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Please contact us at (919) 828-0577 or by email below with questions or comments.

Sincerely,
SMITH GARDNER, INC.



Madeline German, P.G.
Project Geologist
madeline@smithgardnerinc.com



Stacey A. Smith, P.E.
Senior Engineer
stacey@smithgardnerinc.com

Attachment: Revised 32-I Permit Application

cc: Mary Whaley, NCDEQ
File