

## **Ritter, Christine**

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**From:** Ritter, Christine  
**Sent:** Monday, February 22, 2016 12:31 PM  
**To:** Tim Rogers  
**Cc:** Wayne Sullivan; Chao, Ming-tai; Hare, Wes  
**Subject:** Wayne Co. Permit Amendment, 9601 & 9606 Landfill Gas Monitoring Plan

Mr. Rogers-

I have initiated a review of the January 2016 Landfill Gas Monitoring Plan and have the following comments:

The January 2016 Landfill Gas Monitoring Plan submitted for 9606-MSWLF and 9601-CDLF states that landfill gas monitoring shall be conducted at five landfill gas monitoring points at the 9601-CDLF (active C&D over unlined MSWLF) and two landfill gas monitoring points shall be monitored at 9606-MSWLF (active lined MSWLF) for a total of seven monitoring points for permitted facilities.

Wayne County's consultant previously requested in 2014 to modify the landfill gas monitoring plans for 9606-MSWLF and 9601-CDLF, specifically to reduce the number of landfill gas monitoring points from 25 to 7. The NC Solid Waste Section denied the request to reduce the number of landfill gas monitoring points from a total of 25 to only 7. Therefore, Wayne County should still be monitoring all existing landfill gas monitoring points quarterly for both permitted facilities.

While we concur that some of the interior landfill gas monitoring well locations located between the active C&D landfill over unlined MSWLF and the current lined MSWLF may potentially be removed from the network, we strongly disagree that exterior monitoring points should be removed from the monitoring network, specifically on the west side of the active C&D over unlined MSWLF (9601-CDLF). A previous statement made by the County's consultant in March 2014 that many of the landfill gas monitoring points are submerged under water were unsubstantiated at that time. The NC SWS conducted a comprehensive landfill audit and NC SWS personnel walked the entire property boundary of both permitted facilities in April 2013 and did not identify landfill gas monitoring wells submerged under water. Surface water samples collected from the west side of the active CDLF facility have historically been dry. The NC SWS therefore believes the stream in that area of the landfill (9601-CDLF) to be intermittent.

The last US Army Corps of Engineers wetlands delineation study conducted at the Wayne County active MSWLF (9606-MSWLF) was in 1996. If Wayne County maintains that the stream and/or creek on the west side of both facilities are perennial and not intermittent and that the landfill gas monitoring points are submerged under water and that wetlands are hydraulic barriers to landfill gas migration, the NC SWS requests that Wayne County conduct a new wetlands delineation study certified by the US Army Corps of Engineers or other certified wetlands professional.

Additionally, please submit all landfill gas monitoring data collected from all landfill gas monitoring points starting with the 4th quarter of 2013 through the present time (quarterly landfill gas data was previously submitted for sampling events up to and including 3rd quarter 2013) to assist in our review of the January 2016 Landfill Gas Monitoring Plan.

Thank you,

**Christine Ritter**  
Hydrogeologist  
Solid Waste Section  
Division of Waste Management  
NC Dept of Environmental Quality

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**From:** Chao, Ming-tai  
**Sent:** Thursday, January 14, 2016 11:02 AM  
**To:** Tim Rogers <tim.rogers@waynegov.com>  
**Cc:** Wayne Sullivan <wsullivan@mesco.com>; Mussler, Ed <ed.mussler@ncdenr.gov>; Hare, Wes <wes.hare@ncdenr.gov>; Ritter, Christine <christine.ritter@ncdenr.gov>; Rice, Sarah M <sarah.rice@ncdenr.gov>  
**Subject:** Wayne Co. Permit Amendment, 9601 & 9606

Dear Mr. Rogers:

Good morning & Happy New Year. The Solid Waste Section (SWS) received the following documents on 01/13/16:

1. Permit Amendment Application for Wayne County Landfill: C&DLF unit (on top of the closed MSWLF), Permit # 9601-CDLF-1997 & MSWLF unit (subtitle D) 9606-MSWLF-1998. This application was scanned and placed in the document tracking system with a DIN 25494.
2. Updated Landfill Gas Monitoring Plan for Wayne County Landfill: C&DLF unit, Permit # 9601-CDLF-1997 & MSWLF unit (subtitle D) 9606-MSWLF-1998. This application was scanned and placed in the document tracking system with a DIN 25495.

Pursuant to the North Carolina Session Law (SL-2015-241) & House Bill 765, the SWS intends to issue Wayne County (the County) Landfill a “Life Of Site” Permit which will combine all landfill units and non-disposal solid waste management units in to a single permit on or after July 1, 2016. **The permit fee for the permit amendment is not required**, but the financial assurance (FA) mechanism, annual fees, and Compliance History Review (CHR) must be approved for the permit issuance. Ms. Sara Rice, the SWS Compliance Officer will contact you shortly for the FA and CHR reviewing processes.

The SWS is working on the new rules to adopt the Session Law (SL-2015-241) & House Bill 765 at this moment followed by the revision of the permit format of the Life Of Site Permit. The Permit to Operate of the Wayne County lined MSWLF unit, Permit No. 9606-MSWLF-1998 (DIN 19025) will expire on **June 13, 2016**, and the Permit to Operate of the Wayne County C&DLF unit on top of the unlined, closed MSWLF, Permit No. 9601-CDLF-1997 (DIN 16640) will expire on **August 27, 2016**. **The landfill units can continue to operate under the condition of the existing permit (DIN 19025 &16640) if the following conditions are met on or by July 1, 2016:**

1. The new rules of the Life of Site Permit to adopt the Session Law (SL-2015-241) & House Bill 765 are not finalized.
2. The County submits completely sufficient and adequate permit amendment applications for the Wayne County landfill facility in a timely manner for the SWS making a final permit decision and issuing a new permit.

The SWS will reviewed the permit application shortly and thanks you for the timely submittal.

Best regards,

*Ming Chao*

Ming-Tai Chao, P.E.

Environmental Engineer

Permitting Branch, Solid Waste Section

NCDEQ, Division of Waste Management

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**From:** Wayne Sullivan [<mailto:wsullivan@mesco.com>]

**Sent:** Wednesday, January 13, 2016 8:13 AM

**To:** Chao, Ming-tai <[ming.chao@ncdenr.gov](mailto:ming.chao@ncdenr.gov)>

**Cc:** Tim Rogers <[tim.rogers@waynegov.com](mailto:tim.rogers@waynegov.com)>

**Subject:** Wayne Co. Permit Amendment

Ming,

Hope you had a nice Holiday and a good start to the New Year. Yesterday we sent out via UPS the Permit Amendment for Wayne Co. You should receive it in at least the next couple of days. If you don't, please let me know and we'll resend.

Thanks and have a nice day and the rest of the week.

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**D. Wayne Sullivan**

Project Manager

Municipal Engineering Services Co. PA

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