

Permit No.	Date	Document ID No.
32-01	January 03, 2011	12617

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**December 28, 2010 via a mail**

Solid Waste Section  
Raleigh Central Office



**North Carolina Department of Health and Human Services**  
**Division of Public Health • Epidemiology Section**  
**Occupational and Environmental Epidemiology Branch**  
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Beverly Eaves Perdue, Governor  
Lanier M. Cansler, Secretary

Jeffrey P. Engel, M.D.  
State Health Director

December 20, 2010

Mr. Stacy Smith, P.E.  
RSG Engineering and Associates  
14 N. Boylan Avenue  
Raleigh, NC 27603

Subject: Landfill Gas Collection for City of Durham Landfill  
Durham County

Dear Mr. Smith:

We have reviewed your asbestos operations plan dated December 13, 2010, regarding the Durham County Landfill. The scope of work for this project will be to disturb the existing landfill in order to expand the gas collection system by drilling and trenching. The result of this activity will most likely disturb asbestos-containing materials. After reviewing your asbestos operations plan we have the following comments that will need clarification before completing our review of the plan.

1. Clarify in the plan that the MP Developer is really MP Durham.
2. Under Definitions: Add the word "amosite" to the definition for asbestos.
3. Under Project Activities: Provide the approximate length, width and depth for the trenching activities.
4. Under Inspection and Excavated Waste: From our conversation, it was our understanding that all waste removed from the drilling activities will be sampled for asbestos content by a NC Accredited asbestos inspector and not just a visual inspection. Please clarify our understanding on this issue.
5. Under Disposal: All assumed or confirmed friable and/or regulated asbestos waste leaving the Durham County Landfill will require an asbestos waste shipment record (DHHS-3787) per the NESHAP Regulation. A copy of the DHHS-3787 form(s) must be sent to the HHCU. Also, provide the name, address, telephone number and point of contact of the landfill approved to take the asbestos waste.



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Durham County Landfill  
December 20, 2010  
Page 2



6. Clarify the level of OSHA asbestos training the drilling operator, or other associated employees, will have to may disturb asbestos-containing materials.
7. Clarify that a copy of the asbestos operations plan will be maintained on-site until the project has been completed.

In closing, we look forward to working with your industry regarding the recycling of landfill gas while at the same time protecting the public health and the environment from potential exposure to asbestos. If you have any questions about our comments free to contact me or Pat Wylie at (919) 707-5950.

Sincerely,

  
Jeffery W. Bellinger  
Industrial Hygiene Consultant  
Health Hazards Control Unit

cc: Ed Mussler, NC DSWM  
David Lipton, CIH, Interim Manager  
Danny Lineback, IH Supervisor  
Pat Wylie, IH Consultant