



SMITH MOORE LEATHERWOOD



May 20, 2010

Ms. Jaclynne Drummond
Hydrogeologist
Environmental Compliance
Solid Waste Section
Division of Waste Management
NC Department of Environment and
Natural Resources
1646 Mail Service Center
Raleigh, NC 27699-1646

Re: City of High Point Riverdale Drive Landfill, Permit # 41-01
Former Material Recycling Facility

Dear Jackie:

This letter responds to the questions that you included in your letter of January 22, 2010. As a convenience, I have included each of your questions below (sometimes slightly reorganized for clarity), followed by the City's response in italics.

Lot 1 Riverdale Drive Landfill Current Uses Questions and Requests for Information

1. White goods storage area

What are the dimensions of the area? *Approximately 75 by 200 feet.*

What is the maximum number or volume of white goods stored at any one time?
Approximately 80 cubic yards.

How long are they temporarily stored? *Approximately six months.*

Is the area lined or paved? Describe the surface of the area. *It is paved with concrete and asphalt.*

Are chlorofluorocarbons removed from the white goods at the temporary storage area?
Yes.

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2. Empty trailer storage area

What are the dimensions of the area? *Approximately 25 by 125 feet.*

What is the maximum number of trailers temporarily stored in this area at any one time?
Four.

How long are the trailers temporarily stored? *The trailers are no longer used.*

What are the empty trailers used for? *Nothing.*

Is the area located on top of any area of waste disposal in the closed landfill? *No.*

Is the area lined or paved? Describe the surface of the area. *It is paved with asphalt.*

3. Alum sludge

Who approved the disposal of alum sludge from the water treatment plant at the closed landfill, and when? *In approximately 2004, the City received a letter from DENR approving the use of wastewater sludge and demolition debris as beneficial fill at the former Riverdale Drive landfill. Based on an investigation conducted by Chris Thompson, it appears that sometime shortly after receipt of that letter, City staff discussed with one or more representatives of DENR's Winston-Salem Regional Office whether alum sludge from the water treatment plant could be placed on the former landfill as well. No record is available of that discussion.*

How many cubic yards of alum sludge have been disposed? *Alum sludge has been spread on the landfill three times since 2004, with a total of approximately 34,528 cubic yards deposited.*

How much alum sludge is projected to be disposed in the future? *The water plant generates approximately 11,500 cubic yards of alum sludge every time the lagoons are cleaned out, which is approximately every two years. If DENR has no objection, the City would continue to use the sludge as beneficial fill on the former landfill.*

Provide a laboratory chemical analysis of the water treatment alum sludge. *Two TCLP analyses are enclosed.*

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Have the soils adjacent to the disposal of alum sludge been analyzed for typical alum sludge constituents? *No.*

Former MRF Property Current Uses Questions and Request for Information

1. Recyclable materials sorting process

Describe the activities conducted on the property related to “sorting recyclable materials collected from homeowners”, including:

- A list of the particular types of materials sorted.
- The maximum amount of materials on site at any one time.
- How the materials are sorted.
- How the materials are delivered to the site.
- Where they are disposed.
- The machinery and equipment at the site utilized in the process.

The Material Recovery Facility (MRF) accepts recyclable materials primarily from residential customers, but it also receives some materials from businesses, schools, offices and similar organizations. The primary materials that are sorted at the MRF include:

- *Cardboard*
- *Mixed paper*
- *Plastics (#1 and #2)*
- *Aluminum and steel cans*
- *Glass*
- *White goods*

Materials are delivered to the MRF in enclosed trucks and are placed inside the building. Sorting takes place on two sorting lines, and then the materials are baled. All paper fiber (cardboard and paper) is baled and stored inside. The only materials that are stored outside at any time are plastics and glass. Storage baskets hold some sorted materials until enough is collected for baling. Some baskets (holding plastics only) are stored outside until baling takes place. Bales are held until enough products are collected for buyers to obtain full truck loads.

The volume of materials on site at any given time varies greatly. During the Furniture Market, which occurs twice each year, the volume of recyclable material increases.

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Once the MRF has accumulated enough materials to sell one or more full truckloads, the City obtains quotes from buyers and then sells the materials. Buyers send trucks to the MRF, where the materials are loaded and shipped. Any residual, non-recyclable material left over is baled and trucked to the Kersey Valley Landfill for disposal.

The MRF processes about 6,500 to 7,000 tons of recyclables each year. The MRF's efficiency is about 80%. The MRF utilizes fork lifts, wheeled loaders, small trucks, baskets, internal conveyors, magnets and other equipment for sorting.

Does all the sorting and storage take place within the building, under roof? All sorting occurs inside, and some storage is outside.

What type of floor does the building have? The floor is concrete.

If any sorting or storage is conducted outside the building, is it sorted or stored on pavement, concrete, gravel or soil? The area where materials are stored is paved with asphalt and concrete.

2. Ground asphalt storage area

What are the dimensions of the area? Approximately 100 by 100 feet.

What is the maximum amount stored at the site? Approximately 2,000 cubic yards.

For how long is it stored at the site? Six to 12 months.

How is it used? We use it to maintain areas where the shoulders of the street are low.

Is the ground asphalt stored on pavement, concrete or soil? It is on soil.

Is it covered? No.

Will the hydrocarbons from the ground asphalt have any effect on runoff, soil contamination and groundwater contamination? No.

3. Mulch storage area

General response: Mulch has not been stored on the site since 1996. Therefore, we were not able to provide answers to the questions reprinted below.

What are the dimensions of the area?

What is the source of the mulch?

What materials were used to produce the mulch?

If the content of the mulch includes anything other than virgin wood material, provide a laboratory analysis of the mulch.

What is the maximum amount of mulch stored at the site?

How long is the mulch stored at the site?

What is the mulch used for?

Is the mulch stored on pavement, concrete or soil?

Is the mulch covered?

4. Trailer storage area

What is the maximum number of trailers stored at the site? *None. Tire storage is now handled by Guilford County, and therefore the City does not use any trailers at the site.*

How long are the trailers stored? *Not applicable.*

Are the trailers being stored on pavement, concrete or soil? *Not applicable.*

What are the uses of the trailers? *Not applicable.*

5. Vehicle parking area

What is the maximum number of vehicles parked on the site? *Approximately 30.*

Are vehicles being parked on pavement, concrete, gravel or soil? *Asphalt.*

Who is parking at the former MRF site? *As discussed above, the MRF is active, and the MRF employees park there.*

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Sincerely,

A handwritten signature in black ink, appearing to read "SWE", written over a faint, illegible typed name.

Stephen W. Earp

Enclosures

cc: Mr. Chris Thompson
Mr. Fred Baggett
Mr. Gary Babb



MERITECH, INC.

Environmental Laboratories

A Division of Water Technology and Controls, Inc.

RECEIVED

MAR 03 2010

Public Service Dept.

Client: Ken Newnam
Client: City of High Point
Address: PO Box 230
High Point, NC 27261

Client Sample ID: H.P Old Landfill Riverdale
Sample Collection: 1/28/10
Meritech Sample ID: 02041033
Report Date: 2/15/10

1311 - TCLP Metals

Metals - EPA 200.7

Extraction: 2/8/10 Analyst: BD
Analysis: 2/12/10

<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Det. Limit</u>	<u>Reg. Limit</u>	<u>Dilution Factor</u>
Arsenic	< 0.100	mg/L	0.100	5.0	1
Barium	1.66	mg/L	0.050	100.0	1
Cadmium	< 0.020	mg/L	0.020	1.0	1
Chromium	< 0.050	mg/L	0.050	5.0	1
Lead	< 0.100	mg/L	0.100	5.0	1
Selenium	< 0.100	mg/L	0.100	1.0	1
Silver	< 0.050	mg/L	0.050	5.0	1

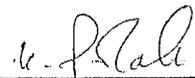
Metals - EPA 1631

Extraction: 2/8/10 Analyst: SMC
Analysis: 2/9/10

<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Det. Limit</u>	<u>Reg. Limit</u>	<u>Dilution Factor</u>
Mercury	< 0.020	mg/L	0.020	0.2	1

<u>Parameter</u>	<u>Method</u>	<u>Result</u>	<u>Units</u>	<u>Det. Limit</u>	<u>Reg. Limit</u>	<u>Date Analyzed</u>
pH	SM 4500 HB	7.0	SU	-	2.0 - 12.5	2/8/10

I hereby certify that I have reviewed and approve these data.



Laboratory Representative



MERITECH, INC.

Environmental Laboratories

A Division of Water Technology and Controls, Inc.

Client: Ken Newnam
Client: City of High Point
Address: PO Box 230
High Point, NC 27261

Client Sample ID: Ward Plt Sludge Lagoon
Sample Collection: 4/12/10
Meritech Sample ID: 04131061
Report Date: 4/21/10

1311 - TCLP Metals

Metals - EPA 200.7

Extraction: 4/15/10
Analysis: 4/20/10

Analyst: BD

<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Det. Limit</u>	<u>Reg. Limit</u>	<u>Dilution Factor</u>
Arsenic	0.118	mg/L	0.100	5.0	1
Barium	3.21	mg/L	0.050	100.0	1
Cadmium	< 0.020	mg/L	0.020	1.0	1
Chromium	< 0.050	mg/L	0.050	5.0	1
Lead	< 0.100	mg/L	0.100	5.0	1
Selenium	< 0.100	mg/L	0.100	1.0	1
Silver	< 0.050	mg/L	0.050	5.0	1

Metals - EPA 1631

Extraction: 4/15/10
Analysis: 4/20/10

Analyst: SMC

<u>Parameter</u>	<u>Result</u>	<u>Units</u>	<u>Det. Limit</u>	<u>Reg. Limit</u>	<u>Dilution Factor</u>
Mercury	< 0.020	mg/L	0.020	0.2	1

I hereby certify that I have reviewed and approve these data.



Laboratory Representative