



January 27, 2009

Mr. Ming-Tai Chao, P.E.
Environmental Engineer II
NC DENR - Division of Waste Management
401 Oberlin Road, Suite 150
Raleigh, NC 27605

**Re: Lee County C&D Landfill (Permit No. 53-01)
Progress Report Update**

Dear Mr. Chao:

On behalf of Lee County, Richardson Smith Gardner & Associates, Inc. (RSG) would like to respond to your request for a progress report update stated in your letter dated January 9, 2009 (see **attached**), as follows. The items stated in your request are repeated below in *italics* and our response follows in **bold**.

1. *The total acreages of the closed landfill.*

The Lee County construction and demolition debris (C&D) landfill unit has a total waste footprint of approximately 7.5 acres.

2. *What kind of tasks have been completed?*

Currently the County has completed work on erosion control and drainage measures around the perimeter of the landfill; regraded portions of landfill side slopes; and completed the placement of final cover (24" min. soil cover) on the majority of the perimeter slopes. At this time, the County estimates that approximately 75% of the final cover has been completed.

3. *What tasks need to be completed and an accompanying schedule of completion.*

The placement of final cover needs to be completed on the top areas of the landfill unit. Also, diversion berms and down pipes will need to be placed as the work progresses. Additionally, permanent seeding is required on all areas.

Lee County and RSG staff have discussed the schedule for completion and intends to have all of the work related to the closure, including preparation of a final report, completed by April 30, 2009.

4. *The reasons why the closure activities can not be completed in accordance with the original schedule - completion of closure on December 31, 2008.*

Weather has been the primary factor affecting the work to date. For every day of rain, it may take the site several days to dry sufficiently to continue work. Additionally, during the work, the County ran short of available soil in their on-site borrow area and elected to procure material from off-site to ensure a sufficient quantity of cover soil.

Mr. Ming-Tai Chao, P.E.
January 27, 2009
Page 2

5. *How will the owner ensure that the identified incomplete closure activities can be properly done in accordance with the revised schedule?*

The County will place a high priority on closure work when weather conditions allow. Additionally, Lee County has adequate resources available to complete the closure work by April 30, 2009.

6. *What steps are being taken to prevent threats to human health and the environment from the unclosed unit?*

During the closure work, the County has maintained soil cover over the waste. Site staff monitor customers of the on-site convenience center and/or yard waste processing area to minimize the potential for public access to the closed site. Additionally, the site is gated during non-business hours.

Please contact me at your earliest convenience with any questions or comments which you may have on this submittal or any further questions or comments you may have on the landfill closure.

Sincerely,
Richardson Smith Gardner & Associates, Inc.



Pieter K. Scheer, P.E.
Principal, Project Manager
pieter@rsgengineers.com



Attachments: NC DWM Letter - January 9, 2009

cc: Joe Cherry, Lee County

REC'D JAN 15 2009



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor
Dee Freeman., Secretary

January 09, 2009

Mr. Joseph T. Cherry
Lee County C&D Landfill
PO Box 1968
Sanford, North Carolina 27330

Subject: Revised Closure Schedule for Lee County Construction and Demolition Landfill (C&DLF) Facility
Lee County, North Carolina. Permit No. 53-01, Document ID No. 6577

Dear Mr. Cherry:

The Solid Waste Section (The Section) has received a letter dated December 30, 2008, submitted by Richardson Smith Gardner & Associates, Inc (RSG) on behalf of Lee County, regarding an extension of time to close the above referenced C&DLF. To facilitate the Section making a determination on approving your request of the extension of closure completion at the Lee County C&DLF, please submit to the Section the following information no later than thirty (30) days after receiving this letter. In accordance with Rule .0543(c)(6) please describe why the closure will, of necessity, take longer than 180 days and what steps have been taken and will be taken to prevent threats to human health and the environment from the unclosed C&DLF unit. To meet this rule requirement provide a submittal which contains, as appropriate the following information. A written progress report update, that includes, but is not limited to:

- The total acreages of the closed landfill.
- What kinds of tasks have been completed?
- What tasks need to be completed and an accompanying schedule of completion.
- The reasons why the closure activities can not be completed in accordance with the original schedule – completion of closure on December 31, 2008.
- How will the owner ensure that the identified incomplete closure activities can be properly done in accordance with the revised schedule?
- What steps are being taken to prevent threats to human health and the environment from the unclosed unit?

Should you have any questions regarding this matter please contact me at (919) 508-8507 or by email at Ming.Chao@ncmail.net.

Sincerely,

Ming-Tai Chao, P.E.
Environmental Engineer II
Permitting Branch, Solid Waste Section

cc: Pieter K. Scheer, P.E., RSG
Ed Mussler – Permitting Branch Supervisor
Jason Watkins – DWM
Geof Little - DWM
Christ Marriott - DWM