

North Carolina
Department of Environment and Natural Resources

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Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary
Dexter R. Matthews, Director



July 19, 2006

Mr. W.R. Cooksey, General Manager
East Carolina Environmental Landfill
1922 Republican Road
Aulander, North Carolina 27805



Re: Alternative Daily Cover Request
ECE Landfill
Permit No. 08-03

Dear Mr. Cooksey:

The Solid Waste Section has received your request for the use of Sage Mulch as an alternative daily cover at the East Carolina Environmental Landfill. Based on the information included in the request, a demonstration period of 180 days has been approved to evaluate and ensure compliance with 15A North Carolina Administrative Code 13B .1626(2)(b). 15A NCAC 13B .1626(2)(b) requires an owner/operator to demonstrate that the alternative cover material and thickness control disease vectors, fires, odors, blowing litter and scavenging without presenting a threat to human health and the environment. However, Sage Mulch cannot be used as intermediate cover. 15A NCAC 13B .1626(2)(c) requires areas which will not have additional wastes placed on them for 12 months or more, but where final termination of disposal operations has not occurred, to be covered with a minimum of one foot of intermediate cover.

You will need to fully document the use of Sage Mulch during the demonstration period with photos, journals and other pertinent information regarding compliance with 15A NCAC 13B .1626(2)(b). The effectiveness must be documented thoroughly throughout the test period. At the end of the test period, all substantiating information will need to be submitted to the Solid Waste Section.

The Solid Waste Section will periodically inspect the referenced facility during the 180-day trial period to ensure that the alternative daily cover meets the requirements stated above. At the end of the 180-day period, if the Solid Waste Section determines that the demonstration period was successful, approval for permanent use of the alternative daily cover will be granted.

Mr. W.R. Cooksey
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If you have any questions, please contact me at (252) 948-3913.

Sincerely,

A handwritten signature in cursive script that reads "Chuck Boyette".

Chuck Boyette
Waste Management Specialist
Solid Waste Section

cc: John Crowder, SWS
Mark Poindexter, SWS
Ed Mussler, SWS

June 28, 2006

Mr. Chuck Boyette
943 Washington Square Mall
Washington, NC 27889

Re: Mulch ADC

Dear Mr. Boyette:

East Carolina is to begin a project which includes processing Sage Mulch. In our operating records we are permitted to use mulch and wood chip products as an alternative daily cover, ADC.

To confirm the use of a waste product, Sage Mulch, as an ADC our Mr. Ray Hoffman discussed with Mr. Ed Mussler its' use. Mr. Mussler agreed it can be used as an ADC and suggested we have you approve it for a 180 day trial. With that ECE is respectfully requesting you provide documentation that approves the use of the Sage for ADC.

If you have any questions please contact me at your convenience, (252) 348-3322. Otherwise we look forward to receiving the approval letter.

Sincerely,

W. R. Cooksey
East Carolina Environmental