



5400 Glenwood Avenue, Suite 300
 Raleigh, North Carolina 27612
 tel: 919 787-5620
 fax: 919 781-5730

December 3, 2007

Mr. Ed Mussler
 Permitting Supervisor
 North Carolina Department of Environment and Natural Resources
 Division of Waste Management
 Solid Waste Section
 1646 Mail Service Center
 Raleigh, NC 27699-1646

Subject: Buncombe County, North Carolina
 Buncombe County Solid Waste Management Facility
 Permit No. 11-07
 C&D Operation Plan Modification – Asbestos Disposal

RECEIVED
December 6, 2007
 Solid Waste Section
 Asheville Regional Office

APPROVED DOCUMENT
 Division of Waste Management
 Solid Waste Section
 Date February 26, 2008 By LY Frost

Document ID No. 3848
 Scanned By LY Frost Date February 26, 2008

Dear Mr. Mussler:

Buncombe County (County) currently disposes of asbestos in their Subtitle D landfill. On behalf of the County, CDM requests approval from the North Carolina Department of Environment and Natural Resources, Solid Waste Section (NCDENR SWS) to allow disposal of asbestos in the County's construction and demolition (C&D) debris landfill.

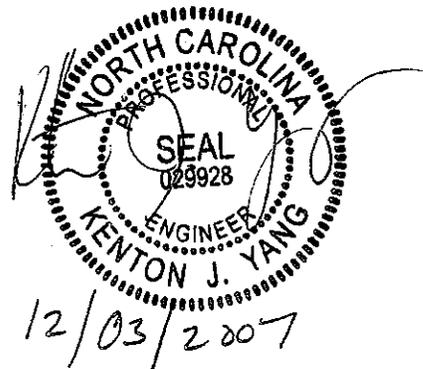
Modifications to the C&D Operation Plan for asbestos disposal are provided in Attachment 1 (only the pertinent sections of the Operations Plan are included). Modifications are highlighted for ease of review. Also included is the modified operations plan drawing which delineates the asbestos disposal area (see Attachment 2). The permit modification fee of \$1,500.00 is enclosed.

If you have any questions regarding the details of this submittal, or need any additional information, please contact me at 919-325-3500.

Very truly yours,

Kenton J. Yang, P.E.
 Camp Dresser & McKee

cc: L. Frost, NCDENR (SWS)
 J. Mears, BCGSD
 K. Smith, BCGSD



Attachment 1
C&D Landfill Operation Plan Modification
Sections 1 and 12

Section 1

Introduction

1.1 Purpose

This permit application is for the proposed Phase 4 construction and demolition (C&D) debris landfill expansion at the Buncombe County Solid Waste Management Facility. The Phase 4 expansion will include ± 2.9 acres of newly constructed disposal area, increasing the entire disposal area to ± 8.8 acres (piggy-backing the existing Phases 1 and 2). Included in this application is an Operations Plan for the Buncombe County Solid Waste Management Facility staff that will serve as a guide for safe and efficient operation of Phase 4. This Operations Plan has been prepared in accordance with the North Carolina Solid Waste Rule 15A NCAC 13B .0505 Operational Requirements for Sanitary Landfills and, therefore, addresses the following issues.

- Plan and permit requirements
- Spreading and compacting requirements
- Cover requirements
- Erosion control requirements
- Drainage control requirements
- Vegetation requirements
- Water protection requirements
- Access and security requirements
- Sign requirements
- Safety requirements
- Waste acceptance and disposal requirements
- Miscellaneous requirements

1.2 Facility Location

The Buncombe County Solid Waste Management Facility is located on NC 251 (Dixie Highway) in Alexander, North Carolina approximately 9 miles northwest of Asheville, North Carolina (see Figure 1-1). The site is bounded on the south by the French Broad River, which is the major surface water drainage feature in the area. Blevin Branch, Panther Branch and Flat Creek, respectively, bound the north, west and east sides of the site and are tributaries to the French Broad River (see Figure 1-2). A construction entrance is located on NC 251. Primary access for landfilling activities is from SR 1745 (Panther Branch Road).

1.3 Facility Description

The entire landfill site (C&D and Subtitle D) encompasses an area of approximately 557 acres located in Buncombe County. The area is characterized by moderate to steep slopes separating narrow hills and ridges from small incised secondary drainages (locally known as hollows). Elevations range from 1,740 feet mean sea level (msl) up to more than 2,150 feet msl at the tops of some hills. Average annual

precipitation is about 47 inches per year. Average monthly precipitation over the past 10 years is about 3.9 inches and varies from 2.4 inches in October to 5.4 inches in June.

The entire landfill site is approximately 60 percent undeveloped and is covered with mixed coniferous and deciduous forest and open pasture, with predominantly forest in the west half, and larger amounts of pasture on the eastern half. Phases 1 and 2 of the C&D landfill have been completed and are currently at capacity. Phase 3, located south of Phases 1 and 2, was not permitted based on hydrogeological concerns. The Phase 1/2 expansion, located north of Phases 1 and 2, is currently being utilized for C&D debris disposal. Construction of Phases I and II (Cells 1-5) of the Subtitle D landfill has been completed (Cells 4-5 are currently being utilized) and Phase III (Cell 6) construction began in March 2005.

1.4 Population and Areas Served by Facility - 15A NCAC 13B. 0504 (1)(g)(i)

Based on the US Census Bureau, the estimated July 2003 population of Buncombe County was estimated to be 212,672. The North Carolina State Demographics projects the population to be 235,020 and 268,001 for the years 2010 and 2020, respectively. The Buncombe County Solid Waste Management Facility C&D debris Phase 4 landfill will serve only waste streams originating from Buncombe County. Buncombe County, approximately 660 square miles in area, includes the incorporated municipalities of Asheville, Black Mountain, Biltmore Forest, Montreat, Weaverville, and Woodfin.

1.5 Waste Stream - 15A NCAC 13B. 0504 (1)(g)(ii)

Only waste that meets acceptable criteria as described in the North Carolina Solid Waste Management Rules will be accepted at the facility. The C&D debris landfill is permitted to receive the following waste types:

- i. Land Clearing Debris as defined in G.S. §130A-290, specifically, solid waste which is generated solely from land clearing activities such as stumps, trees, etcetera;
- ii. Inert Debris defined as solid waste which consists solely of material that is virtually inert, such as brick, concrete, rock, and clean soil;
- iii. Asphalt in accordance with G.S. §130A-294(m); and
- iv. Construction and Demolition Debris defined as solid waste resulting solely from construction, remodeling, repair or demolition operations on pavement, buildings, or other structures.
- v. Asbestos Waste - any waste material that is determined to contain asbestos (requires special handling, see Section 12.2 -- Special Waste).

There is a separate disposal area for municipal solid waste. White goods, batteries, used motor oil, and common recyclables are accepted from citizens of Buncombe County and recycled.

According to the most recent data provided by Buncombe County, Buncombe County and its municipalities disposed of approximately 200,059 total tons of waste in FY 2003-2004. This tonnage included 29,889 tons of C&D waste (all disposed in the Buncombe County C&D Landfill) and 170,170 tons of MSW; the corresponding waste stream percentages are 15% and 85%, respectively. This increase in C&D waste, up from the previous fiscal year of 8,209 tons, is partly due to the active 2004 hurricane season but also due to the normal growth trends within Buncombe County.

1.6 Equipment Requirements - 15A NCAC 13B .0504 (1)(g)(iii)

Equipment currently owned by the County and utilized at the C&D debris facility includes the following:

- 1 - Rex 390C Trash Compactor
- 1 - Cat D6 Dozer
- 1 - Waste Screening Vehicle (Dodge Pickup Truck)

No additional equipment purchases are anticipated as a result of permitting the Phase 4 expansion.

1.7 Compliance with Rule .0503 (1)

In accordance with 15A NCAC 13A. 0504 (1)(f), all required elements of Rule .0503 (1) have been previously included in the Permit to Construct Application for the Buncombe County Solid Waste Management Facility March 1995.

Section 12

Waste Acceptance and Disposal Requirements

12.1 Acceptable Waste

In accordance with 15A NCAC 13B .0505 (11)(a), a sanitary landfill shall only accept solid wastes which it is permitted to dispose of. The Phase 4 C&D debris landfill expansion will only accept solid wastes that the Buncombe County Solid Waste Management Facility C&D debris landfill is currently permitted to receive. These wastes include the following:

- i. Land Clearing Debris as defined in G.S. §130A-290, specifically, solid waste which is generated solely from land clearing activities such as stumps, trees, etcetera;
- ii. Inert Debris defined as solid waste which consists solely of material that is virtually inert, such as brick, concrete, rock, and clean soil;
- iii. Asphalt in accordance with G.S. §130A-294(m); and
- iv. Construction and Demolition Debris defined as solid waste resulting solely from construction, remodeling, repair or demolition operations on pavement, buildings, or other structures.
- v. Asbestos Waste - any waste material that is determined to contain asbestos (requires special handling, see Section 12.2 -- Special Waste).

The C&D debris landfill will not accept any hazardous waste or municipal solid waste (MSW). Hazardous waste is defined in 40 CFR 261. Municipal solid waste is defined as household waste including garbage and refuse. State regulations also specifically prohibit disposal of used oil, white goods, whole tires, and lead acid batteries in a landfill.

12.2 Special Waste

12.2.1 Asbestos

Asbestos waste is defined as any waste material that is determined to contain asbestos. In accordance with 15A NCAC 13B .0542 (c)(2), asbestos waste must be managed in accordance with 40 CFR 61. The regulated asbestos waste must be covered immediately with soil in a manner that will not cause airborne conditions and must be disposed of separate and apart from other solid wastes, as shown on Operation drawings:

- (A) in a defined isolated area within the footprint of the landfill, or

(B) in an area not contiguous with other disposal areas. Separate areas must be designated so that asbestos is not exposed by future land-disturbing activities.

12.2.1.1 Asbestos Waste Acceptance and Handling

The County will accept asbestos waste, however, specific acceptance and handling will be required. The County will require any hauler that wants to dispose of asbestos material to schedule an appointment for disposal 24 hours in advance. The hauler must have a waste shipment record and a current Notification of Demolition and/or Asbestos Renovation Permit granted by the Western Carolina Regional Air Quality Agency and/or a current Asbestos Removal Permit granted by the Health Hazards Control Unit, Division of Public Health.

In order to maintain an accurate record of asbestos disposal quantities and locations, landfill staff has identified a specific location in the C&D landfill which will contain these wastes (see attached Operation Plan Drawing). Following asbestos disposal, cover operations will ensure that the disposed asbestos does not become airborne.

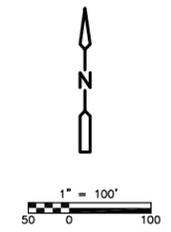
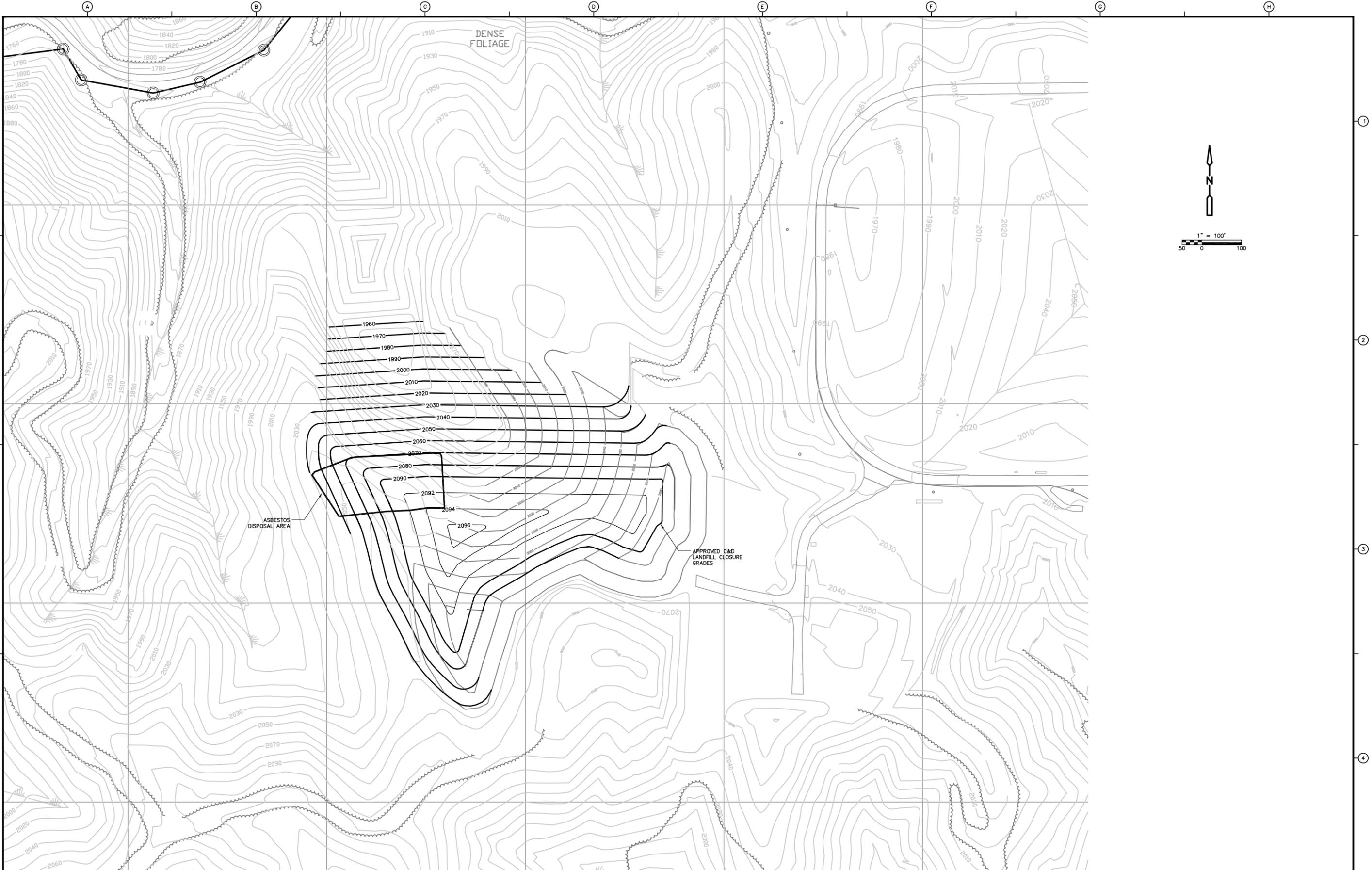
12.3 Waste Screening Program

Buncombe County has adopted a waste screening program at their C&D debris landfill facility for detecting and preventing the disposal of MSW, hazardous waste, and liquid waste. This program includes:

- Random inspection of incoming loads or other comparable procedures.
- Records of inspection.
- Training of facility personnel to recognize hazardous and liquid waste.
- Development of a contingency plan to properly manage any identified hazardous and liquid waste addressing identification, removal, storage, and final disposition of the waste.

Since the Phase 4 expansion will be located within the same property as the Buncombe County Solid Waste Management Facility C&D debris landfill, the existing waste screening program can be effectively used.

Attachment 2
C&D Landfill Operation Plan Modification
Asbestos Disposal Area Drawing



REV. NO.	DATE	DRWN	CHKD	REMARKS

DESIGNED BY: K. YANG
 DRAWN BY: K. YANG
 SHEET CHK'D BY: C. GABEL
 CROSS CHK'D BY: _____
 APPROVED BY: _____
 DATE: NOVEMBER 2007

CDM Camp Dresser & McKee
 5400 Glenwood Avenue, Suite 300
 Raleigh, North Carolina 27612
 Tel: 919-787-5620 Fax: 919-781-5730

BUNCOMBE COUNTY
 NORTH CAROLINA
**CONSTRUCTION AND DEMOLITION LANDFILL
 PHASE 4**

**OPERATIONS PLAN
 ASBESTOS DISPOSAL AREA**

PROJECT NO. 6447-61934
 FILE NAME: OPERATIONS_ASBESTOS
 SHEET NO.
OP-1