



North Carolina Department of Environment and Natural Resources

Division of Waste Management

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Director

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July 8, 2009

Mr. Jerry Mears
Buncombe County Solid Waste Manager
85 Panther Branch Road
Alexander, North Carolina 28701

Subject: Site Hydrogeologic Report, Design Hydrogeologic Report, and Water Quality
Monitoring Plan
Buncombe County Solid Waste Management Facility
Permit to Construct Application
Substantial Amendment and Phase 5
C & D Landfill
Permit 11-07
Doc ID 7485

Dear Mr. Mears:

The Solid Waste Section (SWS) completed technical review of the Hydrogeologic Report (site report), Design Hydrogeologic Report (design report), and Water Quality Monitoring Plan (plan). Camp, Dresser & McKee (CDM) included the site report, design report, and plan in the Permit To Construct (PTC) application for the Buncombe County Solid Waste Management Facility. The application is comprised of two volumes: Volume 1 (Doc ID 7374) containing the site report and Volume 2 (Doc ID 7375) containing the design report and plan. Both volumes are entitled, "Substantial Amendment and Phase 5".

Not included in the PTC is a Gas Monitoring Plan pursuant to Regulation 15A NCAC 13B .0544(d). In the regulation are specifications for implementing routine monitoring of "methane gas or other explosive gases generated" at Construction and Demolition (C&D) landfills. A gas monitoring plan should be included in the application. Additional guidance for monitoring landfill gas is available at the SWS website: http://www.wastenotnc.org/swhome/met_mon.html.

In addition to the aforementioned requirement, required revisions to the site report, design report, and plan are listed below. The numbers correspond to the numbered paragraphs in each document.

Site Report

2.2.2 Correct the sentence where it is stated that "no springs were observed within the ...expansion footprint". Contrary to the report, two springs and streams are shown

within the proposed landfill footprint depicted on Sheet 2-1. One is near where cross sections C-C and D-D intersect; the other, along cross section A-A.

2.2.3 See comment in Section 2.2.2.

2.3.2 Match what is reported as the “current” study with what is proposed. Phase 5 is listed in the application and cover letter. However, in the report Phase VII is listed as the current investigation for the proposed landfill expansion.

2.3.2.2 See Comment 2.3.2.

2.4 Under the subheading “Drilling Operations”, specify alluvium as the fourth lithologic unit, since discussion of it is presented in subsequent sections of the report. Three lithologic units are listed; whereas, four reportedly exist at the site.

2.7 Provide the groundwater flow nets for stratigraphic sections shown in Figures 2-1 to Figures 2-5 as indicated in the report. Depicted in the sections are lithologic units but not the groundwater flow nets referenced in the site report.

2.14.1.2 Correct the first statement containing “no groundwater discharge points...in the proposed expansion”. Depicted on Sheets 2-1 and 2-2 are two springs and streams within the expansion areas proposed for Phase 5.

2.14.3 See comment for Section 2.14.1.2.

Figures

Figures 2-1 to Figure 2-5 Show the groundwater flow net mentioned in Section 2.7.

Design Report

1.0 In this section or elsewhere in the design report, specify acreage of the footprint.

1.3 Clarify what is the “current” investigation. Phase VII is identified as the current investigation; whereas, Phase 5 is specified in the application.

2.2 Correct the statement that 9 piezometers are used. Only 5 piezometers are shown on sheets depicting proposed Phase 5.

4.1 Show compliance with vertical separation requirements pursuant to Regulation 15A 13B .0540(2)(a).

Figures

Figure 3 Show the proposed landfill grades for Phase 5.

Figure 5 Extend cross section C-C’ across the full width of proposed Phase 5 and show proposed landfill grades for Phase 5.

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Plan

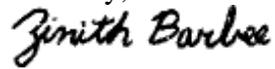
- 3.1 Account for groundwater monitoring wells MW-9 and MW-9D listed on Table 1 but not shown on Sheet 1.

Sheets

Sheet 1 Show location of MW-9 and MW-9D, which are listed in Table 1.

If you have any questions. I can be reached at zinith.barbee@ncdenr.gov or at 919-508-8401.

Sincerely,



Zinith Barbee
Hydrogeologist
Solid Waste Section

cc: Ed Mussler	Solid Waste Section
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Central File	