



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor
Dee Freeman, Secretary

SOLID WASTE SECTION

July 10, 2009

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

Subject: Engineering Technical Review – PTC Application
Buncombe County C&D Landfill, Phase 5
Buncombe County, Permit #11-07, Document ID No. 7955

Mr. Mears:

The Division of Waste Management, Solid Waste Section (Section) has completed the engineering technical review of the document titled *C&D Landfill Substantial Amendment and Phase 5 Permit to Construct Application, Buncombe County, North Carolina, Volumes 1 and 2*, September 2008. It has been determined the Section requires clarification or additional information in order to complete the technical review. Please provide a response for each of the following items:

Engineering Plan

1. Subgrade elevation contours are missing from drawing EP-3. Rule .0539(e)(2) requires Engineering drawings that illustrate grading plans including *proposed limits of excavation, subgrade elevations, intermediate grading for partial construction*.
2. Drawing EP-6 only provides top elevations, surface water control features and seeding details. Rule .0539(e)(4) requires Engineering drawings that illustrate the cap system including *base and top elevations, landfill gas devices, infiltration barrier, surface water removal, protective and vegetative cover, and details*.
3. There are no cross-sections in the Engineering drawings. Rule .0539(e)(6)(A) requires Engineering drawings that illustrate Cross-sections *showing borings, which indicate existing ground surface elevations, base grades, seasonal high ground-water level, estimated long-term seasonal high ground-water and bedrock level*.
4. Base grade contours are not illustrated on Drawings EP-4 and EP-5. Rule .0539(e)(6)(B) requires Engineering drawings that include *a map showing the existing ground surface elevation and base grades*.

Construction Quality Assurance Plan

5. Section 3.3 of Part 6: Construction Quality Assurance Plan states *progress meetings will be held as deemed necessary* with no mention made of the frequency of troubleshooting meetings. Rule .0541(b)(5) requires a plan for holding daily and monthly troubleshooting meetings.

Operations Plan

6. Section 9 of Part 7: Operation Plan makes no mention of leachate containment or discharge of pollutants into waters of the United States. Rule .0542(1)(4) requires leachate to be contained on-site and Rule .0542(i)(5) requires C&DLF units not to cause a discharge of pollutants into waters of the United States.
7. Letter of Notice dated May 28, 2009 discusses revisions to the Operation Plan regarding methane monitoring. This document states *future proposed methane monitoring wells M-5, -6, -7, -8, and -9 will be installed as subsequent phases of landfill development are completed*. Please clarify if these wells will be installed prior to closure of each phase and, if not, please specify a time frame for installation after closure.

If you should have any questions regarding this matter please contact me at (828) 296-4703, or by email at allen.gaither@ncmail.net .

Sincerely,



Allen Gaither
Environmental Engineer

Cc: Kristy Smith – Buncombe County
Kenton Yang – CDM
Zinith Barbee – SWS/RCO
Andrea Keller – SWS/ARO