



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary
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SOLID WASTE SECTION

December 10, 2007

Mr. Michael Brinchek, P.E.
Camp, Dresser, and McKee
5400 Glenwood Avenue, Suit 300
Raleigh, North Carolina 27612

Subject: Review Letter
Buncombe County MSWLF
Response to Conditions for Compliance
Permit No. 11-07
Buncombe County

Dear Mr. Brinchek:

The Division of Waste Management, Solid Waste Section received the Response to Conditions for Compliance for the Buncombe County Solid Waste Management Facility, Permit No. 11-07 on October 12, 2007. The Response was prepared for Buncombe County by CDM and is dated October 11, 2007. I have reviewed the Response, along with the staff of the Solid Waste Section Asheville Regional Office; this letter constitutes a preliminary review of the engineering portion of the referenced permit application. Your responses to the following comments will expedite the review of this application:

General

- Should there be another breakout and leachate were to collect in a sediment pond or other surface waters, the facility should analyze the contaminated water for the Appendix 1 list of constituents plus the following parameter; BOD₅, COD, phosphate, nitrate, sulfate. The sample results will be used to determine whether the pond or surface waters are impacted by the release.

Operation Plan

- Each pump stations should be equipped with operational visual and audible high level alarms.
- Each pump station should be given a numerical identification.
- Each pump station should be inspected a minimum of weekly, including:
 - Alarms - to ensure they are properly operating.
 - Pumps - to ensure they are properly operating.

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- A general visual inspection of the LCS should occur weekly and immediately after each ½ inch rainfall event, including;
 - Leaks
 - Breakouts
 - Pipe failures
- The leachate storage pond level should be inspected weekly, at a minimum. The Solid Waste Section, Asheville Regional Office should be notified immediately should the minimum freeboard level be exceeded.
- All inspections should be documented by: inspector, location, date, time, items inspected, and comments.
- All LCS valves should be exercised annually and repaired and/or replaced as needed.
- Flow meters should be calibrated annually.
- Electronic level controls must be operational at all times and calibrated annually.
- The Ops Plan calls for pump oil replacement; the question was raised as to whether this style pump is in use at the facility.
- The facility should acquire a portable generator that can be kept on site for emergencies, that is capable of supplying adequate power to operate any given pump station. Each pump station should be equipped with a functional receptacle for quick generator connection.
- All leachate collection lines should be cleaned at least once per year. Note: - the Division may allow leachate collection line cleaning once every two years if; the facility has continuous flow monitoring and demonstrates that the leachate collection lines are clear and functional based on at least three consecutive annual cleanings. Remote camera inspections of the leachate collection lines should occur, following initial cleaning, at least once every five years thereafter and following the clearing blockages.

If you should have any question regarding this matter you may contact me at (828) 296-4704.

Sincerely,



Larry Frost
Regional Engineer

cc: Deb Aja – SWS/ARO
Bill Wagner – SWS/ARO