

Scanned by Cameria J.	Date 4/13/09	Doc ID # 6725
--------------------------	-----------------	------------------

501 Great Circle Road
Suite 150
Nashville, TN 37228

Tel: (615) 255-2288
Fax: (615) 256-8332

www.browncaldwell.com

**BROWN AND
CALDWELL**

Permit No. 13-04

November 2, 2006

Mr. Ed Mussler
NC DENR
Waste Management Division
Solid Waste Section
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

26-131273.001

Subject: Additional Waste Placement in Closed Areas of Cells 1A/1B
CMS Landfill
Concord, North Carolina

Dear Mr. Mussler:

This letter is provided on behalf of BFI Waste Systems of North America, Inc. [an Allied Waste Industries, Inc. company (AWIN)] to describe the proposed method and construction quality assurance (CQA) procedures for the reopening a closed section of the Charlotte Motor Speedway Landfill V (CMS) landfill. The purpose of the additional waste placement is to make use of the existing, permitted airspace that is still available in Cells 1A and 1B. The additional waste placement will allow the CMS Landfill to reach originally permitted final elevations within the footprint of Cells 1A and 1B (the subject area), (Drawing No. 1).

GUIDELINES FOR CAP REMOVAL AND WASTE PLACEMENT

AWIN proposes to remove the existing cap system's protective soil layer and geosynthetics over approximately 23 acres of the subject area (see Drawing 1). The capping system on Cell 1A and 1B were installed according to closure plans and details in the Engineering Plan Drawings for the BFI - Charlotte Landfill V - Vertical Expansion, by S&ME dated June 4, 1999. The cap system components will be removed and the municipal solid waste placed according to the following sequence of construction:

1. The limits of the area where the cap system will be removed will be surveyed and identified with clear "edge of liner" signs using coordinates from the attached Drawing 1.

Mr. Ed Mussler
November 2, 2006
Page 2 of 3

2. The cap system will not be removed over the entire subject area at one time. The initial cutting of the landfill cap geomembrane liner will be observed by a Senior CQA Engineer to make sure it is consistent with the guidelines provided in this letter.
3. After the limits of the subject area for additional waste placement has been identified and the geomembrane liner cut, the AWIN operations personnel will remove the cap system components in the areas required for access and filling operations. The removal of the cap system components from the subject area will be conducted incrementally as filling operation progress to minimize percolation of stormwater into the existing waste mass.
4. The protective cover from the subject area will be removed and placed as daily cover in the open area of the active CMS landfill. The geomembrane liner material from the subject area will be removed incrementally and disposed as solid waste in the active CMS landfill. If the soil liner beneath the geomembrane liner will be impacted with odors and/or solid waste, then it will not be used as daily cover in the landfill. To eliminate the potential for creating a barrier layer to leachate percolation the soil liner that is left in place will be relocated and/or mixed with the surface waste layer prior to additional waste placement.
5. The perimeter edge of the geosynthetics that are to remain in place will be covered with sacrificial geosynthetics and/or other clean material in order to protect the edge and maintain a regular surface for tie-in when final capping is performed.
6. Gas wells in the subject area will be extended as necessary to achieve the proper final elevations using construction details in the Vertical Expansion drawings by S&ME, dated June 4, 1999.
7. The waste will be placed to the maximum allowable slope as shown on the Vertical Expansion drawings. Waste will be placed and compacted in accordance with standard landfill operating procedures.

The estimated airspace that AWIN proposes to capture at CMS as a result of removing the cap system components and resuming filling operations in the subject area is approximately 800,000 cubic yards. It is important to note that approval for the additional waste placement has already been provided by the accepted vertical expansion by S&ME dated June 4, 1999.

Final Closure of Subject Area and Tie in to Existing Final Grades

After the proposed final grades have been achieved in the subject area, the open sections of Cells 1A and 1B will be closed in accordance with the requirements of the

Mr. Ed Mussler
November 2, 2006
Page 3 of 3

permit. The standard CQA procedures for cap system construction outlined in the Vertical Expansion permit from June 1999 will be used to ensure proper tie-in to the perimeter cap system that was left in place.

The geomembrane for the new cap system will be welded to the existing geomembrane around the perimeter of the previously opened area. A geocomposite drainage layer and protective soil will then be placed to complete the permitted cross section of the final cap. The entire disturbed area will be reseeded following protective soil placement.

As shown on the attached drawing, CMS will tie-in to the existing top of slope at the stormwater control bench located on the northern side of Cell 1A. On the southern portion of Cell 1A/1B and the final grades will tie-in to the originally permitted grades. This area will eventually be overfilled over Cell 1A/1B as part of Phase 5 according to grades shown in permit drawings previously approved by the NCDENR. If additional stormwater control benches are required to tie into the existing top of slope on Cell 1A, these will be installed according to details shown in the Vertical Expansion drawings by S&ME dated June 4, 1999.

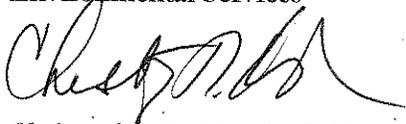
If there are any questions or comments to this proposed approach, please notify Mike Gurley of Allied, or Chris Hardin of Brown and Caldwell.

Very truly yours,

BROWN AND CALDWELL



Jonathan Miller, P.E.
Principal Engineer
Environmental Services



Christopher D. Hardin, P.E.
Solid Waste Practice Leader

CDH:jh
Attachments

cc: Mike Gurley, Allied Waste

