



North Carolina Department of Environment and Natural Resources  
Division of Waste Management

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December 10, 2010

Mr. Charles Brushwood  
Solid Waste Director  
1242 Old Highway 29  
Thomasville, North Carolina 27360

Subject: Completeness & Engineering Technical Review  
Davidson County C&D Landfill Facility  
Davidson County, Permit #29-06, Document ID No. 12348

Mr. Brushwood:

The Division of Waste Management, Solid Waste Section (Section) has completed the review of the document titled *Permit Amendment Application, Davidson County C&D Landfill – Phases 3&4* (DIN 12223). The document was submitted on your behalf by Richardson, Smith, Gardner & Associates and was received in the Asheville Regional Office on November 16, 2010.

The submittal has been reviewed for completeness in accordance with General Statute 130A-295.8(e). A determination of completeness means that the application includes all required components but does not mean the required components provide all of the information that is required for the Section to make a decision on the application. The components required by 15A NCAC 13B.0547(3) have been submitted, however, the permitting activity fee has not been paid, so the application is deemed incomplete.

Based on this review, it has been determined the Section requires clarification or additional information in order to issue the Permit to Construct. Please provide a response for each of the following items:

1. The Facility Plan, in accordance with 15A NCAC 13B.0537(d)(1)(A), must contain site development drawings which *delineate the areal limits of all landfill units, and incorporate the buffer requirements set forth in Item (1) of Rule .0540*. Buffer requirements were not found on the engineering drawings provided in Attachment G.
2. The Engineering Plan, in accordance with 15A NCAC 13B.0539(e)(5), must contain engineering drawings that *illustrate temporary and permanent sedimentation and erosion control plans*. The Erosion and Sedimentation Control Plan, Attachment F, Table of Contents indicates the Erosion and Sedimentation Control Plans and Details are contained in Attachment I. There is no Attachment I in the submittal (ends at Attachment H).
3. The Engineering Plan, in accordance with 15A NCAC 13B.0539(e)(6)(A), must contain a *map showing the existing ground surface elevation and base grades. The map must include labeled boring locations which indicate seasonal high ground-water level, estimated long term high ground-water level in accordance with Part (b)(2)(E) of Rule .0538 of this Section, and bedrock*

- level in accordance with Part (b)(2)(F) of Rule .0538 of this Section.* The engineering drawings in Attachment G did not include a map with all required items.
4. The Operation Plan, in accordance with 15A NCAC 13B.0542(b)(1)(B), must contain operation drawings that illustrate the *progression of operation including initial waste placement, daily operations, yearly contour transitions, and final contours.* The operation drawings in Attachment D do not include all required items.
  5. The Operation Plan, in accordance with 15A NCAC 13B.0542(b)(1)(C), must contain operation drawings that illustrate *stormwater controls for active and inactive subcells.* The operation drawings in Attachment D do not include all required items.
  6. The Operation Plan, in accordance with 15A NCAC 13B.0542(b)(1)(D), must contain operation drawings that illustrate *special waste handling areas, such as asbestos disposal area, within the C&DLF unit.* The operation drawings in Attachment D do not include all required items.
  7. The Operation Plan, in accordance with 15A NCAC 13B.0542(b)(1)(E), must contain operation drawings that illustrate *buffer zones, noting restricted use.* The operation drawings in Attachment D do not include all required items.
  8. The Operation Plan, in accordance with 15A NCAC 13B.0542(c)(2)(A), must contain operation drawings that illustrate regulated asbestos wastes are disposed of separate and apart from other solid wastes *in a defined isolated area within the footprint of the landfill.* Section 2.5.4.1, Asbestos Management (MSW or C&D Landfill Units), indicates there is a designated asbestos disposal area, but the area is not shown on the operation drawings in Attachment D.
  9. The Operation Plan requirements, in accordance with 15A NCAC 13B.0542(e)(16), prohibit disposal of wastes that *have been shredded, pulverized, or processed to such an extent that the composition of the original waste cannot be readily ascertained except as specified in Subparagraph (17) of this Paragraph.* There is nothing in the Operation Plan to indicate the CDLF will adhere to this requirement.
  10. The Operation Plan requirements, in accordance with 15A NCAC 13B.0542(g)(3), state *all windblown material resulting from the operation must be collected and disposed of by the owner and operator at the conclusion of each operating day.* Section 1.8, Litter Control, states *a litter control crew picks up litter around the site and on access roads as routinely as required.* This Section should be revised to meet the requirements of the Administrative Code.
  11. The Operation Plan requirements, in accordance with 15A NCAC 13B.0542(i)(1), state *owners and operators of all C&DLF units must ensure that the units do not violate any applicable requirements developed under a State Implementation Plan (SIP) approved or promulgated by the U.S. EPA Administrator pursuant to Section 110 of the Clean Air Act.* There is nothing in the Operation Plan to indicate the CDLF will adhere to this requirement.
  12. The Operation Plan requirements, in accordance with 15A NCAC 13B.0542(i)(2), state *open burning of solid waste, except for the approved burning of land clearing debris generated on-site or debris from emergency clean-up operations, is prohibited at all C&DLF facilities.* There is nothing in the Operation Plan to indicate the CDLF will adhere to this requirement.
  13. The Operation Plan requirements, in accordance with 15A NCAC 13B.0542(i)(4), state *fires and explosions that occur at a C&DLF require verbal notice to the Division within 24 hours and written notification within 15 days.* There is nothing in the Operation Plan to indicate the CDLF will adhere to this requirement.
  14. The Operation Plan requirements, in accordance with 15A NCAC 13B.0542(j)(8), state *the removal of solid waste from a C&DLF is prohibited unless the unit has included in its operational plan a recycling program which has been approved by the Division.* There is nothing in the Operation Plan to indicate the CDLF will adhere to this requirement.

15. The Operation Plan requirements, in accordance with 15A NCAC 13B.0542(1)(2), state *surface water must not be impounded over waste*. There is nothing in the Operation Plan to indicate the CDLF will adhere to this requirement.
16. The Operation Plan requirements, in accordance with 15A NCAC 13B.0542(1)(3), state *solid waste must not be disposed of in water*. There is nothing in the Operation Plan to indicate the CDLF will adhere to this requirement.
17. The Operation Plan requirements, in accordance with 15A NCAC 13B.0542(1)(4), state *leachate must be contained on-site or treated prior to discharge*. There is nothing in the Operation Plan to indicate the CDLF will adhere to this requirement.
18. The Operation Plan requirements, in accordance with 15A NCAC 13B.0542(1)(5)(A) & (B), state *C&DLF units must not: cause a discharge of pollutants into waters of the United States and, must not cause the discharge of a nonpoint source of pollution to waters of the United States*. There is nothing in the Operation Plan to indicate the CDLF will adhere to this requirement.
19. The Operation Plan requirements, in accordance with 15A NCAC 13B.0542(n)(1)(F), state *the owner and operator of a C&DLF unit must record and retain at the facility, or in an alternative location near the facility, the notation of date and time of placement of cover material*. There is nothing in the Operation Plan to indicate the CDLF will adhere to this requirement.
20. The Operation Plan requirements, in accordance with 15A NCAC 13B.0542(n)(1)(G), state *the owner and operator of a C&DLF unit must record and retain at the facility, or in an alternative location near the facility, all audit records, compliance records and inspection reports*. There is nothing in the Operation Plan to indicate the CDLF will adhere to this requirement.
21. The Operation Plan requirements, in accordance with 15A NCAC 13B.0542(n)(3)(A), state *the operating record must also include a copy of the approved operation plan required by this Rule and the engineering plan required by Rule .0539 of this Section*. Section 1.14, Record Keeping Program, does not include maintaining a copy of the Engineering Plan as part of the operating record.
22. The Operation Plan requirements, in accordance with 15A NCAC 13B.0542(n)(3)(B), state *the operating record must also include a copy of the current Permit to Construct and Permit to Operate*. Section 1.14, Record Keeping Program, does not include maintaining a copy of the current Permit to Construct / Operate as part of the operating record.
23. The Closure and Post-closure Plan requirements, in accordance with 15A NCAC 13B.0543(c)(4), state *prior to beginning closure of each C&DLF unit as specified in Subparagraph (5) of this Paragraph, an owner or operator must notify the Division that a notice of the intent to close the unit has been placed in the operating record*. There is nothing in the Closure and Post-closure Plan to indicate the CDLF will adhere to this requirement.

If you should have any questions regarding this matter please contact me at (828) 296-4703, or by email at [allen.gaither@ncdenr.gov](mailto:allen.gaither@ncdenr.gov) .

Sincerely,



Allen Gaither  
Environmental Engineer

Cc: Mr. Pieter Scheer – RSG & Associates  
Mr. Hugh Jernigan – SWS/WSRO