



NC DEPT. OF ENVIRONMENT
AND NATURAL RESOURCES
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Waste Industry Experts

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MOORESVILLE REGIONAL OFFICE
DIVISION OF WASTE MANAGEMENT, SWS

August 19, 2010

Mr. Ed Mussler
NCDENR, Division of Waste Management
1646 Mail Service Center
Raleigh, NC 27699

**RE: PIEDMONT LANDFILL AND RECYCLING CENTER (Permit No. 34-06)
 POST CLOSURE CARE PLAN REVISION**

Dear Mr. Mussler,

On behalf of Waste Management of Carolinas, Joyce Engineering, Inc. (JEI) is submitting the enclosed revised Post Closure Care Plan for the Piedmont Landfill. The Piedmont Landfill is currently in the Post Closure Care Period. The official Letter of Closure is included as an appendix to the revised Plan.

The purpose of the Plan revision is to include onsite generation of electricity (using landfill gas as fuel) as a post closure activity at the landfill. The location and a description of the operation of electricity generating facility are provided in the revised Plan.

Waste Management is in the process of obtaining all necessary permits from Forsyth County, and intends to begin construction of the electricity generating facility once approved by Forsyth County.

Sincerely,
JOYCE ENGINEERING, INC.

A handwritten signature in black ink that reads "Stephen Cowie". The signature is written in a cursive, flowing style.

Stephen Cowie
Sr. Project Consultant

C: Al Lacsamana (Waste Management, CSMG)
 James Kisiel (Waste Management, Renewable Energy)
 John Murray (NCDENR, Mooresville Regional Office)

WASTE MANAGEMENT OF CAROLINAS, INC.

POST-CLOSURE CARE PLAN

FOR

**PIEDMONT LANDFILL AND RECYCLING CENTER
KERNERSVILLE, NORTH CAROLINA**

REVISED AUGUST 2010

NOTE

Previously the Post Closure Care Plan has been included as a section of a single Closure & Post Closure Care Plan prepared originally by Rust Environment & Infrastructure (1993) and updated by Waste Management, Inc. (1994), and Joyce Engineering, Inc. (May 2002, December 2002). An official Letter of Closure was issued to the Piedmont Landfill and Recycling Center on December 28, 2004, stating that the Post Closure Care Period began on October 29, 2004.

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1.0 PURPOSE

Under the requirements of Rule .1629 of the North Carolina Solid Waste Management Regulations, the facility must submit revisions to a written Post-Closure Care Plan to the Division. The plan must present information concerning landfill post closure care activities, and financial assurance for these activities, pursuant to Rules .1627-.1629. This plan contains the necessary information to meet the above-referenced requirements for the Piedmont LRC.

This plan is being updated to include operation of a facility to generate electricity using landfill gas as fuel.

2.0 SITE DESCRIPTION

The Piedmont LRC has been in the Post Closure Care Period since October 29, 2004. The official Letter of Closure, which was issued December 28, 2004 by the Division of Waste Management, is included in Appendix 1.

The Piedmont LRC is located on approximately 108 acres of property in Forsyth County, North Carolina, approximately 10 miles north of the city of Kernersville. The landfill disposal area occupies an approximate footprint of 65± acres. Waste Management of Carolinas, Inc., a subsidiary of Waste Management, Inc., owns and operates the facility. All of the approximate 65 acres of the landfill have been developed for landfilling operations and have been closed.

A composite liner system on the landfill base consisting of 18 inches compacted cohesive soil with a maximum hydraulic conductivity of 1×10^{-7} cm/sec overlain by a 60 mil HDPE geomembrane exists in Phase I, Modules 1 and 2. A double synthetic with primary and secondary leachate collection systems is incorporated in existing Phase I, Modules 3, 5 and 6 and Phase II, Modules 1 and 2.

The final cover of the landfill consists of geomembrane overlain by geocomposite drainage medium and cover soil of approximately two feet.

All liner systems meet the requirements of the Solid Waste Management Regulations.

3.0 INSPECTION, MAINTENANCE & MONITORING

(Rule .1627 (d)(1) and .1629 (c)(1))

Activities performed during the post-closure care period include routine scheduled inspection and maintenance programs at the facility to ensure the integrity of facility components. These components include, but are not limited to, the landfill final cover, leachate management system, groundwater monitoring system and landfill gas management system. In addition, routine monitoring for leachate levels, groundwater quality, surface water quality, and gas migration will continue.

3.1 FINAL COVER

(Rule .1627 (d)(1)(A))

The landfill final cover will be inspected at least quarterly during the post-closure care period. The cover will be inspected for signs of erosion, differential settlement, vegetation stress, desiccation, or other defects which may sacrifice its integrity. Over time, as vegetation becomes well established and the rate of differential settlement lessens, less frequent inspection may be justifiable and a written request may be made to reduce the monitoring frequency.

The final cover will be repaired in areas where significant rills, gullies, and crevices have been identified. Areas of final cover which are identified as being particularly susceptible to soil erosion or desiccation will be repaired. Also, holes or depressions which had been created by settling and may promote ponding of surface water will be repaired. The landfill final slope on the plateau will be maintained at a minimum of five percent, pursuant to Rule .1627 (c)(3)(A). This will be accomplished by backfilling settled and defective final cover areas with soil and re-grading to ensure the minimum slope requirements are met and the final cover integrity is ensured.

Areas of final cover which have been repaired due to erosion, desiccation, settlement or other causes will be immediately vegetated.

3.2 LEACHATE MANAGEMENT SYSTEM

(Rule .1627 (d)(1)(B))

The leachate management system is shown in detail on the Leachate Management System Plan and Detail sheets in the design drawings (submitted in April 1994).

The leachate force main system incorporated at the facility will automatically discharge leachate from the collection sumps when liquid levels reach a predetermined elevation. The leachate will then be pumped to on-site storage, prior to discharge off-site. Manual and electrical monitoring of leachate levels will be performed routinely in the event of force main system shutdown. Inspections and routine maintenance on the system components will be performed according to manufacturer's specifications.

The quantities of leachate generated by the facility will be recorded and maintained in the facility operating record.

3.3 GROUNDWATER MONITORING SYSTEM

(Rule .1627 (d)(1)(C))

The Piedmont LRC has prepared a groundwater monitoring system in accordance with the requirements of Rules .1631 through .1637. The plan was provided under a separate cover. The

plan describes the procedures to be performed in the sampling and analysis of groundwater quality. In addition, the plan describes routine inspection and maintenance procedures to be performed on the system components. Refer to this plan for detailed information on the operation of the groundwater monitoring system.

3.4 SURFACE WATER MANAGEMENT SYSTEM

(Rule .1627 (d)(1)(C))

The Piedmont LRC will perform surface water monitoring as required by Rule .0602.

Quarterly surface water management system inspection and maintenance will be performed during the first 5 years of the post closure care period, and thereafter may be reduced if justifiable. Drainage channels which have become significantly scoured and eroded will be re-graded to maintain design drainage capacity. Areas which have developed sediment buildup will be cleaned and restored to the proper capacity and dimensions.

Areas of the surface water management system which have been repaired due to erosion, scouring, re-grading, or other causes will be immediately re-vegetated to minimize additional erosion and sediment discharge.

3.5 LANDFILL GAS MANAGEMENT SYSTEM

(Rule .1627 (d)(1)(D))

A landfill gas monitoring plan has been prepared for the facility and is included in the facility Operations Plan. Monitoring for landfill gas migration and recording of the results of testing will be performed on quarterly basis. The results of the monitoring will be presented to the Division.

The facility has an active landfill gas collection and control system, as shown on Drawing PCC-1. The active system consists of 55 vertical landfill gas extraction wells, an HDPE pipe network, valves, condensate management structures, and a blower/flare station. Operations, monitoring, record-keeping and reporting relating to the active landfill gas collection and control system are performed in accordance with the facility's Title V Permit, issued by the Forsyth County Department of Environmental Affairs.

Control of the landfill gas may also be accomplished through combustion in engine-generators that convert the energy in the landfill gas to electricity. All necessary air quality and building permits will be obtained prior to constructing and operating the electricity generating facility. Further information about this facility is provided in Section 5.0 of this plan.

3.6 MISCELLANEOUS FEATURES

In addition to performing inspections and maintenance on the aforementioned landfill features, general facility inspections will be performed for the entire Piedmont LRC. These inspections will be performed at least quarterly during the first 5 years of the post closure care period and will include inspecting facility security features, on-site structures, roads and other features. The inspections will involve touring the property and visually observing the area for indications of damage to components. Damaged items will be repaired or replaced.

4.0 FACILITY CONTACT

(Rule .1629 (c)(2))

During the post-closure care period, all issues concerning the Piedmont LRC should be directed to:

Waste Management Inc.
1000 Parkwood Circle, Suite 700
Attn: Closed Site Management Group
Atlanta, Georgia 30339
Telephone Number: (770) 805-3366

5.0 FACILITY END USE PLAN

(Rule .1629 (c)(3))

During the post closure period, the Piedmont LRC property will be maintained and operated solely as a restricted landfill facility with an electricity generating facility located on the landfill property. Post-closure use of the property will not disturb the integrity of the cap system, base liner system, or any other component of the containment and monitoring systems.

A Post Closure Care Site Plan is included as Drawing PCC-1. Also, a more detailed site plan for the electricity generating facility is included as Drawing P-2.

Further information pertaining to the electricity generating facility is provided in the following sections.

5.1 ELECTRICITY GENERATING FACILITY DESCRIPTION

The electricity generating facility is intended to take advantage of landfill gas as a renewable energy resource by converting the energy in the landfill gas to electricity which will be distributed onto the local power grid through an agreement with Duke Energy.

The facility will use internal combustion engines that are capable of burning landfill gas as fuel. A below-ground HDPE pipe will direct gas from the landfill to the location of the electricity

generating facility (see next section). Equipment will be used to dry and compress (pre-treat) the landfill gas prior to delivery into the engines. Moisture from the process will be collected and deposited in the landfill's leachate collection system via a nearby leachate cleanout pipe.

The engines will be connected to generators that will produce the electricity. A switchgear will synchronize the power with the distribution power system and transform the voltage to 12.47 kV with a transformer.

The engines will be placed on a concrete pad (approximately 145' x 44'). The landfill gas pre-treatment equipment, switchgear and transformers will be placed on smaller concrete pads adjacent to the engines. The surrounding area in the near vicinity will be gravel.

The facility will comprise approximately 1 acre.

5.2 LOCATION

The location of the electricity generating facility is approximately 300' northwest of the blower/flare station, on the north side of the landfill. See Drawings PCC-1 and PC-2 for further details of the location.

5.3 HOURS OF OPERATION

The engines will be in operation 24 hours per day, 7 days per week, with the exception of downtime for maintenance and repairs.

5.4 ACCESS & SECURITY

The electricity generating facility will be accessed through the landfill's main entrance gates and access roads. The gates normally remain closed and locked, and access will only be available to designated personnel who will need to attend to the site.

5.5 PERSONNEL

Personnel will be onsite as needed to run the facility and perform maintenance and repairs. These duties will likely be performed by one person and during normal working hours.

A SCADA monitoring system may be installed so that personnel can monitor the site via the internet and also so that notification can be made in the event that unexpected maintenance is required on equipment.

5.6 NOISE CONTROL

Noise from facility equipment will be minimized by use of appropriate mufflers. The equipment will be maintained in good condition to ensure its proper operation. In addition, the landfill

buffers should provide an adequate distance between property boundaries and residences such that noise levels off-site are minimized.

6.0 ADJUSTMENT OF THE POST CLOSURE CARE PERIOD

(Rule .1627 (d)(2))

The post-closure care period at the Piedmont LRC will last 30 years. The length of the post-closure care period may be reduced by the Division if the facility demonstrates that human health and the environment will continue to be protected during this reduced period.

7.0 POST CLOSURE CARE COMPLETION CERTIFICATION

(Rule .1627 (d)(3))

Following completion of the post-closure care period at the Piedmont LRC, certification will be prepared to demonstrate post-closure care was completed in accordance with this plan. The certification will be prepared by a registered professional engineer, and will be provided to the Division. A copy of the certification will be placed in the facility operating record.

8.0 POST CLOSURE CARE COST ESTIMATE

(Rule .1629 (c)(4))

After closure, the total cost of post closure care will decrease each year since the total number of years of care required will decrease. The annual cost of post closure care will increase due to inflation. The total cost will be updated annually, according to the most recent inflation factors and the number of years of post closure care remaining. As of 2010, the annual and total costs for post closure care are summarized in the table below.

APPENDICES

Appendix 1: Letter of Closure



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

December 28, 2004

Mike Loyd, P. G.
Market Area Engineer
Waste Management
251 New Hope Road
Wellford, South Carolina 29385

Re: Determination of Final Closure
Final Closure Phase 2, Vol. I & II, October 2004
Final Closure Southern and Eastern Sideslopes, November 2003
Permit No. 34-06
Piedmont Landfill
Forsyth County, North Carolina

Dear Mr. Loyd:

The Solid Waste Section (the Section) has received and reviewed the documents referenced above certifying the completion of final closure construction of the Piedmont Landfill. Based on the CQA Reports certified by Geosyntec Consultants, the Section has determined that closure activities were substantially completed on October 29, 2004, and that the construction was in general accordance with the CQA plan and permit conditions. The submittals satisfy the requirement of Rule .1627(c)(7).

Based on the referenced certification reports, the Piedmont Landfill municipal solid waste facility is hereby entered into Post Closure care in accordance with Rule .1627(d) as of October 29, 2004, for a period of 30 years except as may be adjusted as provided in Rule .1627(d)(2).

As such, the lined municipal solid waste landfill units at the above referenced facility is hereby subject to the Post Closure conditions contained in the attached Closure Letter and North Carolina Solid Waste Rule .1627. Below is a summary of the general conditions relating to Post Closure.

General Conditions

- Waste Management and its successors are responsible for compliance with the Post Closure conditions including continued monitoring of ground water quality, leachate and landfill gas management and the physical integrity of the final cap system.
- This determination does not relieve Waste Management nor its successors from the completion of any closure requirements, duties, or responsibilities that may be found deficient at any point during the Post Closure period.

- This determination does relieve Waste Management from the Financial Assurance requirements for Closure as required under Rule .1628(b). However, for the duration of the Post Closure period, Waste Management and its successors shall maintain adequate Financial Assurance for Post Closure as required under Rule .1628(c) and Financial Assurance for Corrective Action, if applicable during Post Closure, as required under Rule .1628(d).

For tracking purposes, below is a summary of submittals and rules relating to closure of the site.

Rules For Municipal Solid Waste (MSW) Landfill Closure

- Requirements for closure are contained in 15A NCAC 13B .1627 (or Rule .1627).

Approved Closure Plans

- Construction Quality Assurance Plan for Final Cover dated July 19, 1996, was granted approval on July 31, 1996. (This is a typographical correction to reference No. 10, Attachment 3, in Facility Permit No. 34-06 dated January 13, 2003.
- Request to Revise Final Contours dated June 1997.
- Request for Approval of Alternate Geosynthetic Materials for Piedmont Landfill Final Cover System dated February 18, 2004, and March 8, 2004, and approved March 26, 2004.

Additional Actions Required of the Permittee

- Please provide topographical survey for the closed facility.
- This closure letter and Post Closure conditions must be recorded in accordance with Condition #6 of the attached Closure Letter and a copy of this recorded document returned to the Solid Waste Section at the following address:

DIVISION OF WASTE MANAGEMENT
SOLID WASTE SECTION
1646 MAIL SERVICE CENTER
RALEIGH, NORTH CAROLINA 27699-1646
ATTN: Geof Little

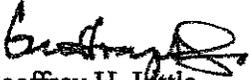
The entire attached Closure Letter should be recorded against the following tract of property as referenced by the deed and permit issue to Waste Management of Carolinas, Inc., Piedmont Landfill, on February 23, 1989, and revised most recently January 13, 2003.

The Solid Waste Section files indicate that certified copy of Permit No.34-06 February 16, 1995, Revision issued to Waste Management of Carolinas, Inc., was recorded in Forsyth County Register of Deeds Book 1849 Pages 1759 through 1771.

Forsyth County Tax Office web site shows the landfill property to be recorded in Deed Book 2139 Page 3782, Deed Date of 10/25/2000.

Please contact me at (919) 733-0692 extension 266 should you have any questions regarding this letter or wish to arrange a meeting to further discuss the matter.

Sincerely,



Geoffrey H. Little
Environmental Engineer
Solid Waste Section

c: Jim Coffey, DWM
Jim Barber, DWM
Mark Poindexter, DWM
Brent Rockett, DWM
Jason Watkins, DWM
Larry Rose, DWM

STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
1646 MAIL SERVICE CENTER; RALEIGH, N.C. 27699-1646

**MUNICIPAL SOLID WASTE LANDFILL FACILITY
LETTER OF CLOSURE**

WASTE MANAGEMENT OF CAROLINAS, INC.
(Waste Management)
and its Successors

is hereby issued a

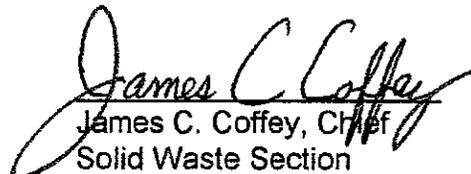
LETTER OF CLOSURE

for the

PIEDMONT LANDFILL

A MUNICIPAL SOLID WASTE LINED LANDFILL FACILITY

located on Freeman Road north of Kernersville, Forsyth County, North Carolina in accordance with Article 9, Chapter 130A, of the General Statutes of North Carolina and all rules promulgated thereunder and subject to the conditions set forth in this letter of closure.


James C. Coffey, Chief
Solid Waste Section
Division of Waste Management

POST CLOSURE CONDITIONS PIEDMONT LANDFILL

GENERAL CONDITIONS

- (1) Waste Management shall conduct Post Closure maintenance and care for the subject facility in compliance with the conditions contained in Rule .1627(d). The permittee shall be responsible for all requirements of the Post Closure period including ground water monitoring, leachate and landfill gas management, and repairs to the final cap system for a period of 30 years except as provided under Rule .1627(d)(2). The Post Closure period shall commence upon the closure date of October 29, 2004, as determined in the certification document dated October 2004 from Geosyntec Consulting in accordance with the Section .1600 rules.
- (2) Waste Management shall maintain the integrity and effectiveness of the approved cap system including making timely repairs to the cover as necessary to address settlement, subsidence, erosion, or other events, and to preventing stormwater run-on and run-off from eroding or otherwise damaging the cap system in compliance with Rule .1627(d)(1)(A).
- (3) Waste Management shall maintain and operate the leachate collection system in accordance with the requirements in Rule .1627(d)(1)(B). The Division may allow Waste Management to cease managing leachate if Waste Management satisfactorily demonstrates that the facility leachate does not pose a threat to human health and the environment.
- (4) Waste Management shall maintain and, at a minimum, perform semi-annual sampling and analysis of the approved ground water monitoring and surface water system in compliance with Rule .1627(d)(1)(C).
- (5) Waste Management shall maintain and operate the gas monitoring system in compliance with Rule .1627(d)(1)(D) to ensure that:
 - (a) The concentration of methane gas generated by the facility does not exceed 25 percent of the lower explosive limit for methane in facility structures (excluding gas control or recovery system components); and
 - (b) The concentration of methane gas does not exceed the lower explosive limit for methane at the facility property boundary.If methane gas levels exceeding these limits are detected, Waste Management shall take all steps required in Rule .1626(4)(c).
- (6) Waste Management shall ensure that the MSWLF 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, as amended.

RECORDATION

- (7) Rule .1627(c)(8) requires that following closure of the MSWLF unit, Waste Management to have a notation recorded on the landfill facility property deed recorded in Deed Book 2139 Page 3782, Deed Date of 10/25/2000 or some other instrument that is normally examined during title search, and notify the Division that the notation has been recorded and a copy has been placed in the operating record. The notation on the deed shall in perpetuity notify any potential purchaser of the property that:
- (a) The land has been used as a landfill facility; and
 - (b) Its use is restricted under the closure plan approved by the Division.
 - (c) The attached certified copy of the closure letter shall be recorded by the Register of Deeds and indexed in the grantor index under the name of the landowner. The certified copy affixed with the Register's seal and the date, book and page number of the recording shall be returned to the Solid Waste Section.

FINANCIAL ASSURANCE

- (8) Waste Management shall provide continuous coverage for Post Closure care in accordance with Rule .1628(c) until released from financial assurance requirements for Post Closure care by demonstrating compliance with Rule .1627(d)(3).
- (9) Waste Management shall provide continuous coverage for corrective action in accordance with Rule .1628(d) as may be necessary.
- (10) Waste Management shall annually adjust the Post Closure cost estimate for inflation or other associated cost factors within 60 days before the anniversary date of the establishment of the financial instrument(s). For owners and operators using the local government financial test, the Post Closure cost estimate shall be updated for inflation within 30 days after the close of the local government's fiscal year and before submission of updated information to the Division.
- (11) Waste Management shall increase the Post Closure care cost estimate and the amount of financial assurance provided under Rule .1628(c)(2), when changes in the Post Closure plan or MSWLF unit conditions increase the maximum costs of Post Closure care.
- (12) Waste Management may reduce the Post Closure cost estimate and the amount of financial assurance provided under Rule .1628(c)(2) if the cost estimate exceeds the

maximum costs of Post Closure care remaining over the Post Closure care period. Prior to any reduction of the Post Closure cost estimate by the Waste Management, a written justification for the reduction shall be submitted to the Division. No reduction of the Post Closure cost estimate shall be allowed without Division approval. The reduction justification and the Division approval shall be placed in the MSWLF's operating record.

POST CLOSURE USES

- (13) Post closure use of the property shall not disturb the integrity of the containment system, or the function of the monitoring systems unless specifically approved by the Division. The Division may approve disturbance of the cap system, base liner system, or other component of the containment system including the removal of waste if Waste Management satisfactorily demonstrates that the disturbance will not cause or potentially threaten harm to human health or safety, or the environment.

COMPLETION OF THE POST CLOSURE CARE PERIOD

- (14) Following completion of the Post Closure care period for each MSWLF unit, Waste Management shall notify the Division that a certification, signed by a registered professional engineer, verifying that Post Closure care has been completed in accordance with the Post Closure plan, has been placed in the operating record in compliance with Rule .1627(d)(3).

ONGOING SOLID WASTE MANAGEMENT ACTIVITIES

- (15) Continuing solid waste management activities within the MSWLF facility shall be conducted in accordance with all pertinent requirements and permit conditions and shall not violate any Post Closure conditions. Any new solid waste activities must be approved by the Solid Waste Section and included as part of the comprehensive Facility Plan.

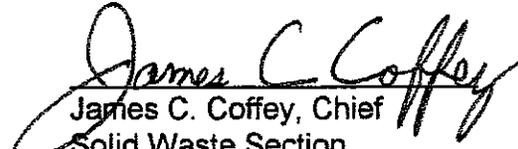
GROUND WATER MONITORING CONDITIONS

- (16) In accordance with .1630(c), ground water monitoring shall be conducted throughout the Post Closure care period for the MSWLF unit in accordance with the requirements of Rules .1631 through .1637. Monitoring of the surface water shall be in accordance with the requirements of Rule .0602.
- (17) Detection monitoring is required at all ground water monitoring wells that are part of the detection monitoring system as established in the approved monitoring plan. At a minimum, the detection monitoring program shall include monitoring for the constituents listed in Appendix I of 40 CFR Part 258.

- (18) The monitoring frequency for all Appendix I detection monitoring constituents shall be at least semiannual during the Post Closure period. At least one sample from each well (background and down gradient) shall be collected and analyzed during semiannual sampling events.
- (19) When a statistically significant increase over background for one or more of the constituents listed in Appendix I or whenever a violation of the North Carolina ground water quality standards (15A NCAC 2L, .0202) occurs at any monitoring well, Waste Management:
- (a) Shall, within 14 days of this finding, report to the Division and place a notice in the operating record indicating which constituents have shown statistically significant changes from background levels.
 - (b) Shall, within 90 days of this finding, establish an assessment monitoring program in accordance with Rule .1634 except as provided for in Rule .1633(c)(3).
 - (c) Shall, within 90 days of finding that any of the constituents listed in Appendix II have been detected at a statistically significant level exceeding the ground water protection standards, initiate an assessment of corrective action measures in accordance with Rule .1635.
 - (d) Shall select a remedy based on the results of the corrective measures assessment that, at a minimum, meets the standards listed in Rule.1636(b).
 - (e) Within 14 days of selecting a remedy, the permittee shall submit an application to modify the permit describing the selected remedy to the Division for evaluation and approval. The application shall be subject to the processing requirements set forth in Rule .1604(c). The application shall include the demonstrations necessary to comply with the financial assurance requirements set forth in Paragraph (d) of Rule .1628.
 - (f) Shall, based on the approved schedule for initiation and completion of remedial activities, establish and implement a corrective action ground water monitoring program, implement the approved corrective action remedy; and take any interim measures necessary to ensure the protection of human health and the environment in accordance with Rule .1637.
- (20) The ground water monitoring program shall include consistent sampling and analysis procedures in accordance with Rule .1632 that are designed to ensure that monitoring results provide an accurate representation of ground water quality at the background and down gradient wells.

CERTIFIED COPY OF CLOSURE LETTER

I do hereby certify that the attached CLOSURE LETTER is an exact and true copy of the closure letter for the Waste Management of the Carolinas, Inc., Piedmont Landfill Municipal Solid Waste Lined Landfill Unit, Permit Number 34-06.

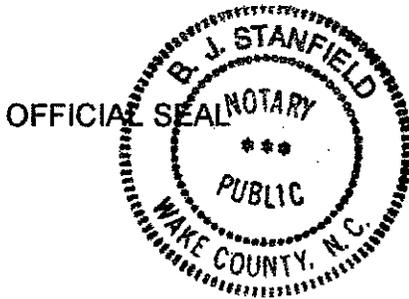

James C. Coffey, Chief
Solid Waste Section
Division of Waste Management

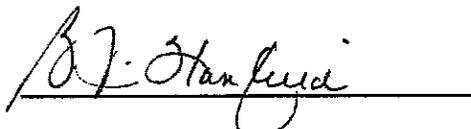
Wake County, North Carolina

I, B. J. STANFIELD, Notary Public for said County and State, do hereby certify that James C. Coffey, of the Solid Waste Section, personally appeared before me this day and acknowledged the due execution of the foregoing instrument.

Witness my hand and official seal,

this the 28th day of December, 2004




NOTARY PUBLIC

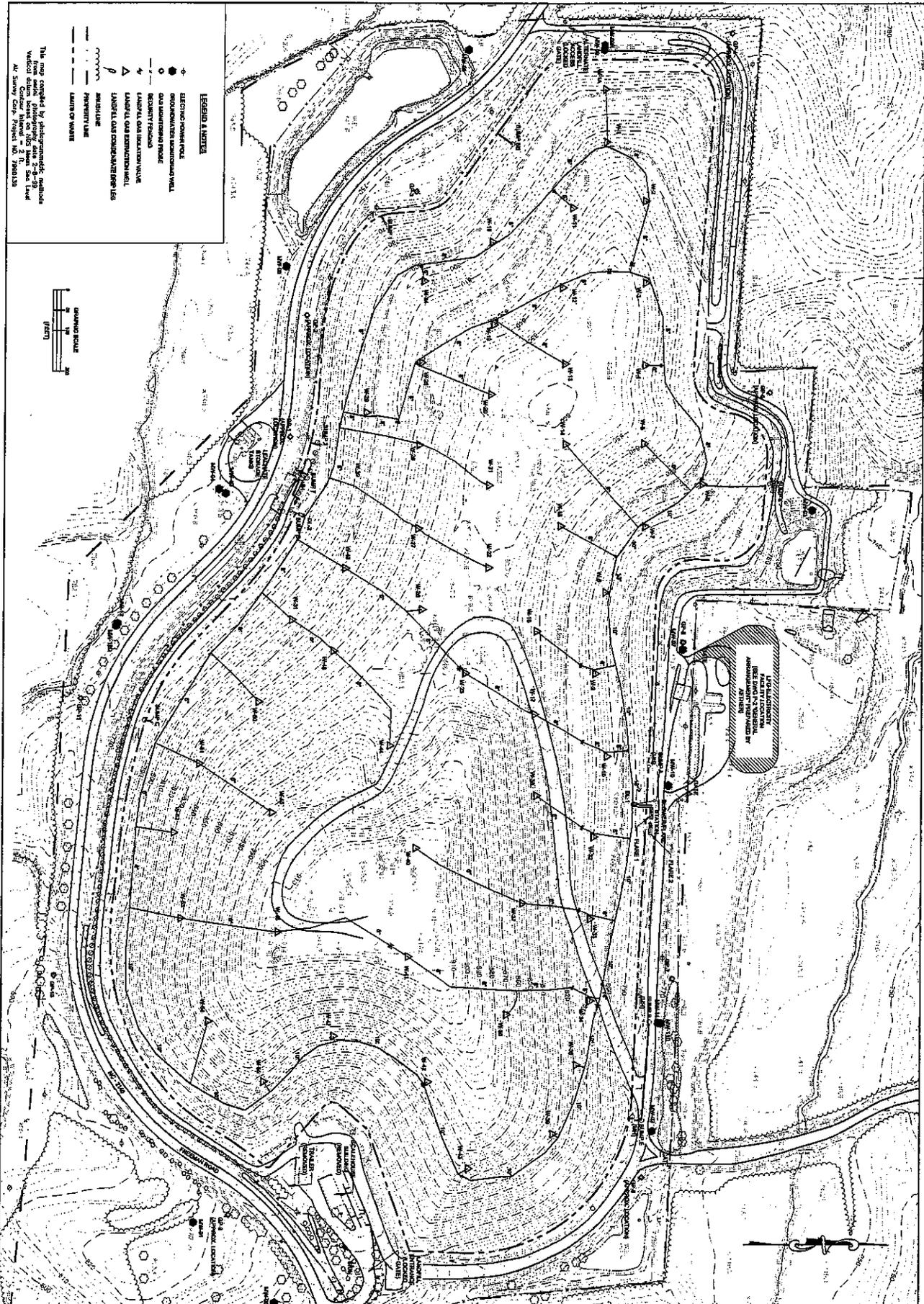
My commission expires December 29, 2004

Note to Register of Deeds: The certified copy of the closure letter shall be recorded by the Register of Deeds and indexed in the grantor index under the name of the land owner. The certified copy affixed with the Register's seal and the date, book, and page number of the recording shall be returned to James C. Coffey, Division of Waste Management, Solid Waste Section, 1646 Mail Service Center, Raleigh, NC 27699-1646.

DRAWINGS

PCC-1: Post-Closure Site Plan

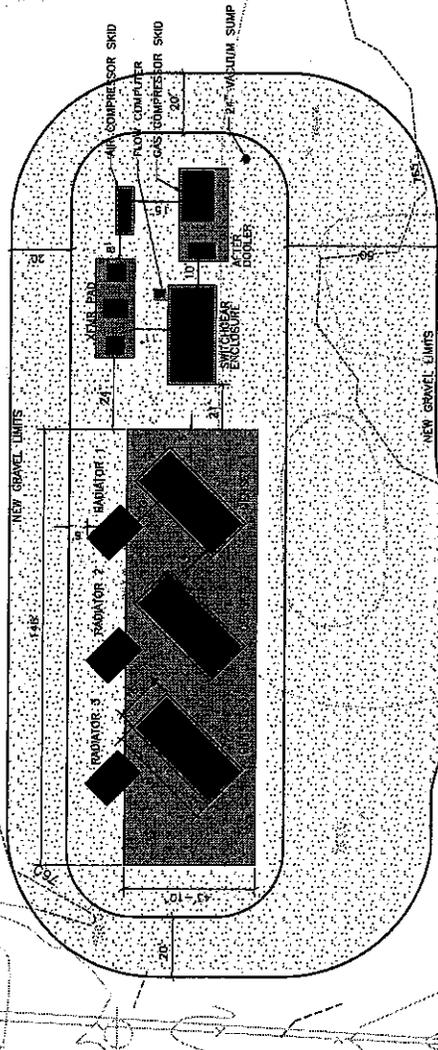
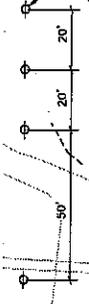
P-2: Landfill Gas to Energy Project “General
Arrangement” (Aether)



DRAWING NO. FCC-1	SCALE AS SHOWN	PROJECT NO. PCC-1	PIEDMONT LANDFILL & RECYCLING CENTER KERNERSVILLE, NORTH CAROLINA			DESIGNED	CADD	DATE: 06/27/20	DATE	REVISIONS AND RECORD OF ISSUE	NO. BY / CK / APP
			POST CLOSURE SITE PLAN			DRAWN	CADD				
					2211 W. MEADOWVIEW ROAD GREENSBORO, NC 27407 PHONE: (336) 325-0352		© 1995 Jones Engineering, Inc. All Rights Reserved				



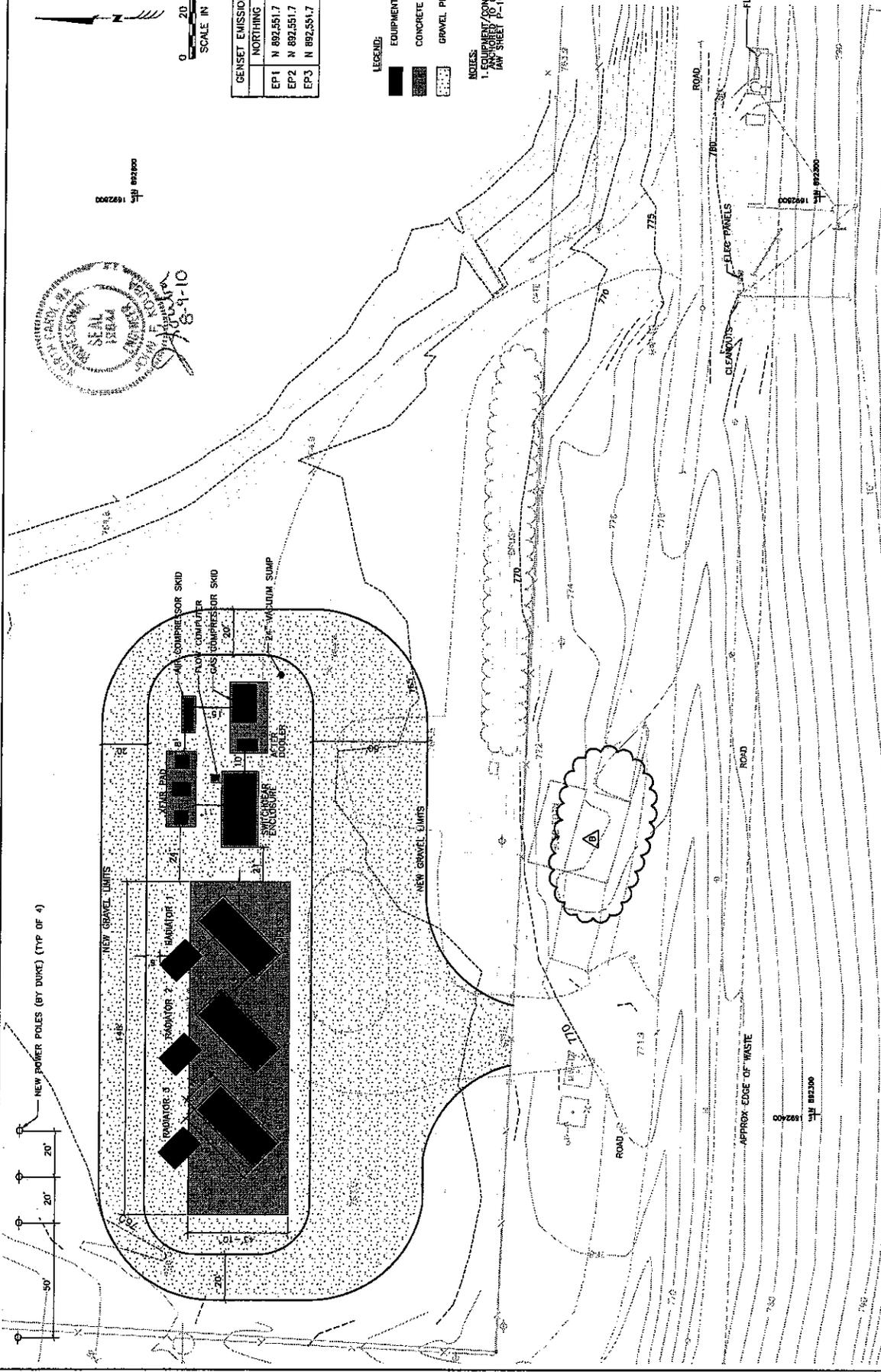
NEW POWER POLES (BY DUKE) (TYP OF 4)



GENSET EMISSION POINTS	
NORTHING	EASTING
EP1 N 892,551.7	E 1,692,475.2
EP2 N 892,551.7	E 1,692,434.2
EP3 N 892,551.7	E 1,692,383.2

LEGEND:	
[Symbol]	EQUIPMENT LOCATION
[Symbol]	CONCRETE PLACEMENT
[Symbol]	GRAVEL PLACEMENT

NOTES:
 1. EQUIPMENT FOUNDATIONS TO BE AS SHOWN ON CONCRETE PADS LAW SHEET P-16.



 aetherdb's elemental design build solutions <small>940 Fort Dix Rd, Suite 109 Independence, MO 64053</small> <small>www.aetherdb.com</small>		SHEET: P-2 DATE: 11/30/2004-P2
SCALE: AS SHOWN DRAWN: [Blank] CHECKED: [Blank] APPROVED: [Blank]		PROJECT: WASTE MANAGEMENT RENEWABLE ENERGY LANDFILL GAS TO ENERGY PROJECT LOCATION: PIEDMONT LANDFILL, KERNERSVILLE, NC
NO. DATE BY DESCRIPTION	1 11-30-04 [Blank] [Blank] [Blank]	