



North Carolina Department of Environment and Natural Resources

Division of Waste Management

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Governor

Dexter R. Matthews  
Director

Dee Freeman  
Secretary

December 23, 2009

Mr. Tom Richardson  
International Paper  
6400 Poplar Avenue  
Memphis, TN 38197

Subject: Engineering Review / Completeness Letter  
Champion-International Industrial Landfill Facility  
Haywood County, Permit #44-001, Document ID No. 9091

Mr. Richardson:

The Division of Waste Management, Solid Waste Section (Section) has completed the engineering review of the Request for Permit Modification submittal (DIN8852) and the Landfill Gas Monitoring Plan submittal (DIN9055) for the closed Champion-International Industrial Landfill Facility. The documents were submitted on your behalf by Altamont Environmental, Incorporated.

The submittals have 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 that the required components provide all of the information that is required for the Section to make a decision on the application. The permitting activity fee, in addition to the required components, has been submitted so the application is deemed complete.

It has been determined the Section requires clarification or additional information in order to issue a Permit. Please provide a response for each of the followings items:

1. Sections 3.1.2.5 and 3.2.2 provide a generic discussion on the activities related to methane monitoring exceedences. Due to the significant risk to human health posed by gas known to be present at the Facility, I am requesting development of a detailed procedure for facility operators to follow in case the continual monitoring alarms are triggered. This procedure should include contact information for all persons requiring notification. In addition, I request a more detailed discussion of the engineering controls that are to be implemented under the given circumstance.
2. Sheet Number C-3 provides elevation contour lines for grade of the existing facility and fill material required for construction of the livestock market structures. Based on these contours the area between the driveway and parking lot appears to produce an unintended drainage swale on the existing cap of the landfill unit. If this plan increases the possibility for erosion of the landfill cap in this, or any other, area changes should be made for protection of the cap.
3. Please provide copies of Sheet Numbers C-6 and C-7 which were not complete at the time of the original application submittal.

4. Is the Yard Inlet detailed on Sheet Number C-10 the same feature as the Concrete Open Throat Catch Basin called out on Sheet Number C-3?
5. Please verify no curbing is planned for the paved driveway and parking surfaces.
6. Please verify landfill gas probe locations LF5B-A1, A2 and A3 on Figure 1 – Landfill Gas Monitoring Well Locations are the actual locations of the Football Storage Building, Little League T-ball Storage Building and Maintenance Office.
7. The Section would recommend adding gas probes, in addition to those planned at the property boundary, in or very close to the trenches for water and sewer just prior to entrance into any structure as these can be conduits for LFG.

In addition, I would like to confirm receipt of the submittals required to resolve the Notice of Violation (NOV) listed in the Facility Compliance Audit Report dated September 29, 2009. As directed, the Landfill Gas Monitoring Plan and Request for Permit Modification outlining all post-closure uses have been received by the Section. However, the NOV cannot be fully resolved until a site inspection is performed by the Field Operations Branch.

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: Joel Lenk – Altamont Environmental  
Andrea Keller – SWS/ARO  
Christine Ritter – SWS/RCO