



## 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

### SOLID WASTE SECTION

June 20, 2008

Mr. Jeff Bishop  
McGill Associates, P.A.  
55 Broad Street  
Asheville, NC 28801

Subject: White Oak Operations Plan Modification Response Letter  
White Oak MSWLF  
Haywood County, Permit #44-07, Document ID No. 4930

Mr. Bishop:

I am writing in response to your June 2008 submission titled *White Oak Landfill, Haywood County, North Carolina Modifications to the Operations Plan, June 2008*. The cover letter accompanying the submission requests the following operations be included in the Operating Permit:

- 1) a new Mulching and Grinding Treatment and Processing Facility;
- 2) a new Small Type 2 Composting Facility;
- 3) a new Alternative Daily Cover (ADC) consisting of a polypropylene tarp;
- 4) a new ADC consisting of 50% mulched material and 50% soil; and
- 5) the use of compost from the Composting Operation as a soil amendment to assist the growth of vegetative cover on slopes.

I reviewed the documentation provided in the submission regarding each of the proposed changes and offer the following comments:

- 1) The *Mulching and Grinding Treatment and Processing Operations Plan* submitted in Appendix 5 appears to satisfy the regulatory application requirements of 15A NCAC 13B Rule .0301.
- 2) The *Composting Operations Plan* submitted in Appendix 6 appears to satisfy the regulatory application requirements of 15A NCAC 13B Rule .1405.
- 3) The *Haywood County Synthetic Cover Operation Plan* submitted in Appendix 2 appears to be complete. However, the *Demonstration Report* also submitted in Appendix 2 is not sufficient. As stated in the June 28, 2007 demonstration approval letter from Mr. Jim Patterson to Mr. Stephen King, the report must include documentation addressing the performance and effectiveness of the material, the number of times the ADC material was used, the quantities of the ADC material and other supportive information including photographs. Please revise the report to include more detail and cover all topics stated in the June 28, 2007 letter.
- 4) No new ADC will be approved without the satisfactory completion of a demonstration period. Similar to the tarp system, Haywood County will have to request approval of a demonstration material containing soil and mulch. Therefore, the soil and mulch ADC cannot be approved along with the other requested changes. I would like to point out the Solid Waste Section has made a decision not to approve any soil/mulch cover materials in excess of a 3:1 ratio.
- 5) The Solid Waste Section is agreeable to the use of compost as a soil amendment to aid in the growth of vegetative cover. However, the compost may only be used at a rate beneficial to the growth of cover. I would like for you to submit additional information on realistic application rates, estimated nutrient values

Page 2 of 2  
Mr. Jeff Bishop  
June 20, 2008  
Permit #44-07

of the compost, an operations plan including method of application and plans for any material which may be unused for an extended period of time.

These comments are only the result of a preliminary review. Once the document is complete I must still perform a full technical review to ensure that all regulatory requirements have been met prior to issuing a new Permit to Operate. Please make the required changes and resubmit the Operations Plan Modification request.

If you should have any questions regarding this matter please contact me at (828) 296-4703.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Gaither', with a long horizontal stroke extending to the right.

Allen Gaither  
Environmental Engineer

Cc: Stephen King – Haywood County Solid Waste  
Dave Pasko – McGill Associates, P.A.  
Andrea Keller – SWS/ARO  
Deb Aja – SWS/ARO