

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director



June 19, 1996

Mr. Haywood Phthisic
Johnston County Solid Waste Supervisor
P.O. Box 2263
Smithfield, NC 27577

Fac/Perm/Co ID #	Date	Doc ID#
51-01	7/12/96	DIN 14444

Re: Full Approval of the Transition Plan for the Johnston County MSW Landfill, Permit Number 51-01

Dear Mr. Phthisic:

The Division of Solid Waste Management has completed its review of the Transition Plan for the referenced landfill submitted by the consultant, McKim & Creed Engineering, on behalf of the owner and operator, Johnston County.

Rule .1603(a)(4)(A) of the Solid Waste Management Rules codified at 15A NCAC 13B requires the owner and operator of an existing MSWLF unit to submit a Transition Plan application for continuing operation and closure of the existing MSWLF unit by April 9, 1994. Rule .1617(d) requires that the plan contain: an operation plan in accordance with Rule .1625, a closure and post-closure plan in accordance with Rule .1629, a water quality plan in accordance with .1623(b)(3), and a report that contains a schedule for closure of the existing MSWLF unit and, if necessary, submittal of an application for a new facility, a lateral expansion or permit renewal.

Rule .1603(d)(2) requires the Division to establish a review schedule for the Transition Plan applications which determines the adequacy of all the plans by October 9, 1996. The rule allows the Division to issue full or partial approvals and to determine the schedule for closure of the existing MSWLF unit based on its review of the complete Transition Plan application.

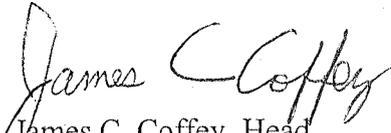
In accordance with Rule .1603(d)(2), the Division has completed its review of the submitted application as amended through June 10, 1996, and hereby issues full approval of the Transition Plan for the referenced landfill.

Section III, Appendix C "Additional Capacity Request", submitted May 30, 1996, will be incorporated into the approved plan allowing Johnston County to achieve the contours as shown on Drawing #5 (Revised 5/30/96), providing an additional approximate 190,000 cubic yards of air space. This will allow Johnston County to continue operating until July 1997 at which time all disposal activities shall cease.

Mr. Phthisic
Johnston County Transition Plan Approval
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If there are any questions or comments, please contact Greg Eades @ (919) 733-0692, extension 344.

Sincerely,

A handwritten signature in cursive script that reads "James C. Coffey". The signature is written in dark ink and is positioned above the typed name.

James C. Coffey, Head
Permitting Branch
Solid Waste Section

cc: Dexter Matthews, SWS
Terry Dover, SWS
Mark Fry, SWS
Tom Wainwright, P.E., McKim & Creed



May 30, 1996

M&C358-0061.OR(10)

Mr. Jim Coffey
NCDEHNR
P.O. Box 27687
Raleigh, NC 27611-7687

ENGINEERS

SURVEYORS

ARCHITECTS

PLANNERS

Dear Mr. Coffey:

This submittal addresses the Johnston County Landfill Transition Plan. The information contained herein answers questions raised by Mr. Bobby Lutfy in the Second Hydrogeologic Review Of the Transition Plan dated February 02, 1996 and it also addresses the need for additional air space for continued operation. New or revised information is attached for insertion into the Transition Plan Application where applicable. For ease of insertion, complete sections were revised rather than inserting individual pages.

An insertion instruction sheet has been included with this information to aid with insertion of text/maps.

The request for additional height of the landfill is discussed first and the reason for such a request. Additional maps and calculations have been included for insertion into the application.

EXISTING LANDFILL CONDITIONS

As you may be aware, the County is conducting landfilling operations in the final landfill area known as Phase III. The present configuration of the landfill approximates slopes as shown in the Vertical Expansion Plan. To achieve the slopes as shown in the Transition Plan, the County only has sufficient air space for an estimated four months of operation. This revision and associated calculations have been combined into Section III, Appendix C.

SUITE 117

BUILDING 1

5625 DILLARD ROAD

CARY, NC 27511

PHONE 919/233-8091

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At the present time, the County is still considering all options for waste disposal. The ultimate deadline for closing the existing landfill is December 31, 1997 although there is not sufficient air space available to continue operations until that date. The text accompanying this request addresses the County's options and volume requirements at this time.

As calculated, the maximum additional air space available in Phase III will enable the landfill operation to continue through July 1997.

RESPONSE TO COMMENTS

The following information is presented in the same format as the comments in Bobby Luffy's letter of February 02, 1996. If changes to the text were required, those changes are attached to this submittal for insertion, otherwise the responses are listed below.

LOCAL AREA STUDY

1. The descriptions as noted on page IV-1 are correct. There are not 25 residences within 2000 feet of the landfill. If you count the number of structures noted by the symbol ■, on the USGS map within the 2,000 ft. boundary, there are approximately twenty five structures. Most of these have been demolished or vacated. There are only two structures: a farm house and trailer, that are actually inhabited within the 2,000 ft boundary. The text has been revised to reflect this situation.
2. Sheet No 2 of 8, Local Area Study Map, has been revised to address the legend questions. There are no known UST's within the 2000 ft. boundary of the landfill. The UST's that were near the scale house have been removed and replaced with above ground tanks.
3. The current survey monument is shown on the revised Local Area Study Map, Sheet No. 2 of 8.
4. Residences along SR1503 are currently using well water. A force main will be available in July 96 to service these residences.
5. The landfill currently uses well water but will use County water once the force main is installed as mentioned above. The location of the well has been added to the Local Area Study map. The location of the well is near the animal shelter. Also, the well was sampled in Nov. 1994. According to the letter that was attached to the sampling, the well water is no longer used for drinking. Those analysis have been included with this document for SWS use and not necessarily for insertion into the document.

WATER QUALITY MONITORING PLAN

1. The text has been changed to reflect the proper exhibit number.
2. The County, in conjunction with McKim and Creed, is currently working with Mark Poindexter on the groundwater assessment investigation. JCLF has completed 2 of the required 4 baseline sampling events.
3. The word has been changed to "unnecessary" on page two.

4. The wording has been changed to a laboratory certified by the Division of Environmental Management.
5. Bailers are factory decontaminated and certified as such. Therefore there is no need to clean the bailers in the field. Water level probes are rinsed in the field between monitoring wells. If the SWS believes that samples of the disinfectant water used needs to be analyzed then JCLF will implement this procedure.
6. Figure A has been eliminated from the document. Analytical procedures are listed via transmittal for each sampling event to DEM certified labs per the included guidance memos.
7. Guidance memos have been included in this section rather than specifying analytical procedures.
8. Unfortunately the Well Schematic Diagrams and Well Completion Records as submitted are the only ones available. More legible copies and Completion Records for wells three thru nine cannot be located. We have included a page from an old Withers and Ravel report that indicates well screen depths etc.

The above information addresses the comments from Bobby Lutfy and also addresses the need for additional air space. Should you or Mr. Lutfy require additional information, please don't hesitate to contact me.

Sincerely,

McKIM & CREED ENGINEERS, P.A.

Tom Wainwright

Tom Wainwright, P.E.
Project Engineer

Enclosures

CC: Haywood Phthisic
Warren Grimes



INSERTION INSTRUCTIONS

SECTION	<u>REMOVE</u>	<u>INSERT</u>
III	N/a	Section III, Appendix C
IV	pp. IV-1 thru IV-5	Same dated Revised 5/20/96
XII	Section XII, pp. 3,4	Section XII, pp. 3,4 dated Revised 5/20/96
XII	Appendix I dated Revised 6/12/95	Same dated Revised 5/20/96
XII	Appendix II Analytical Procedures and Test Parameters, Appendix I Constituents, Figure A	Letters et. al dated 1/18/95
Exhibit	Exhibit Sheet 2 of 8	Same dated 5/30/96
	Exhibit Sheet 5 of 8	Same dated 5/30/96
7.	Exhibit Sheet 6 of 8	Same dated 5/30/96

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management



James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director

February 2, 1996

Mr. C.T. Clayton
McKim & Creed
Building I, Suite 117
5625 Dillard Road
Cary, North Carolina 27511

Saw ✓

RE: Second Hydrogeologic Review Of The Transition Plan For The
Johnston County Landfill, Permit # 51-01

Dear Mr. Clayton,

The Solid Waste Section Hydrogeologic Unit has completed a second review of the Transition Plan for the Johnston County MSW Landfill. There are still several items that need correction or revision before the Transition Plan can be approved. Please make the necessary revisions in response to the following comments and questions:

LOCAL AREA STUDY

- There are internal inconsistencies in the text of the Local Area Study. Page IV-1 references "two occupied residences and two abandoned residences within 2,000 feet of the Johnston County Landfill property line". Pages IV-4 and IV-5 reference "25 residences located within the 2,000 foot perimeter from the landfill property boundary". Neither of these descriptions seems to match the Local Area Study Map, Sheet 2.
- The Local Area Study Map (Sheet 2) does not have a North Arrow and the legend does not indicate many of the symbols used on the map. What symbols are used for residences, other buildings and structures, facility boundaries, 2000 ft. perimeter boundaries, underground storage tanks, etc.? The location of the USTs need to be indicated on the map.
- If the current topography and/or survey benchmarks are being illustrated on a separate map, then this needs to be clearly indicated in the text and/or margin of the Local Area Study Map.

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- If all occupied residences are assumed to be using wells this needs to be indicated on the margin of the Local Area Study Map.
- If the landfill uses a water supply well, the location of this well needs to be clearly indicated on the map. Information on location, depth, and design of the well should be supplied in the Local Area Study. If the well has ever been sampled, analytical data should be included in the report.

WATER QUALITY MONITORING PLAN

- On pages 3 and 4, the drawing for the Water Quality Monitoring Plan is incorrectly referenced as Sheet 7, rather than Sheet 8.
- For pages 7 and 8, details of the "Remediation Strategy" are beyond the scope of the Transition Plan. Approval of the ground-water assessment and/or remediation strategies should be obtained from Mark Poindexter of our Groundwater Compliance Unit.
- On the second page of the revised Sampling Procedure And Protocol, toward the end of the second paragraph under Dedicated Monitoring, it incorrectly references avoiding "necessary volatilization". This should reference **unnecessary** volatilization.
- The first line of the discussion of Administrative Procedures references "samples are to be delivered to a State Certified Drinking Water Laboratory". Current Solid Waste Section guidelines require use of a laboratory certified by the Division of Environmental Management for groundwater analysis. Refer to the guidance memos from the Solid Waste Section dated June 24, 1994 and January 18, 1995.
- The Field QA/QC section states "rinse blanks will not be done". Field equipment rinse blanks are required even for laboratory cleaned bailers. The equipment rinse blanks should be analyzed for all of the Appendix I constituents. Trip blanks need only be analyzed for the organic constituents.

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- Figure A, Laboratory Analyses Request Form: This form does not reference the analytical methods required for Appendix I monitoring. A new or revised form needs to be provided.
- Appendix II, Analytical Procedures and Test Parameters: The following methods referenced in this Table are inconsistent with the guidelines established by the Solid Waste Section: Methods 3020, 7081, 7211, and 7951. Please refer to the guidance memos dated 6-24-94 and 1-18-95 for approved analytical methods.
- The Well Schematic Diagrams are incomplete and partly illegible. There are no Well Completion Records for wells three thru nine.
- Revisions needed for the monitoring reports will be evaluated by the Solid Waste Section Groundwater Compliance Unit.

Most of the items discussed above will require changes to the text, tables, or drawings for the Transition Plan. Please forward the necessary revisions as soon as possible so the Solid Waste Section can complete our technical review. If you have any questions regarding this letter, please contact me at (919) 733-0692, extension 258.

Sincerely,



Bobby Lutfy
Hydrogeologist
Solid Waste Section

cc: Greg Eades, Solid Waste Section
Ben Barnes, SWS - Raleigh Regional Office
Haywood Phthisic, Johnston County