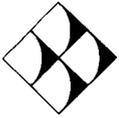


4

Johnston Co.

5102 2002



November 7, 2002

Mr. Mr. Jim Barber
Branch Head
NC DENR - DWM - Solid Waste Permitting
401 Oberlin Road, Suite 150
Raleigh, NC 27605



**RE: Construction Progress and Facility Airspace Update
Johnston County MSW Landfill - Phase 4A - Cell 1
Smithfield, North Carolina**

Dear Jim:

Per our discussion today and on behalf of Johnston County, G.N. Richardson & Associates, Inc. (GNRA) would like to update you on the current construction progress of Phase 4A - Cell 1 of Johnston County's MSW landfill and also update you on the current status of available airspace in the existing active Phase 5 disposal area.

The Phase 4A - Cell 1 project began in April immediately following the issuance of the Permit to Construct⁽¹⁾ and has proceeded on schedule until mid October when wet conditions have significantly slowed construction progress. At this point, the main items of work remaining are dressing up the top of the protective cover soil layer, installation of the geosynthetic rain cover, completion of electrical work and pump start-up, the completion of perimeter drainage channels, and the construction of access roads. The contractor for the work, ES&J, Inc., informs us that with five days of relatively dry site conditions, most of the above items can be completed. Assuming the project can be substantially complete in the next two to three weeks, we anticipate submitting the Construction Quality Assurance Report for review in the same timeframe.

Regarding airspace, the County estimates that they will be nearly out of space in the existing Phase 5 disposal area and will need the use of Phase 4A - Cell 1 by this December 26th. Thus, we would like to request your assistance with review and approval of project documentation and issuance of a Permit to Operate. GNRA is able to meet with you at your convenience during your review to help expedite this process. GNRA and Johnston County appreciate your assistance in helping to meet the needs of Johnston County.

Should you have any questions or require clarification, please contact us at your earliest convenience.

¹ Permit to Construct Phase 4A Cells 1 and 2 (Permit No. 51-03); Issued April 3, 2002.

Mr. Jim Barber
November 7, 2002
Page 2

Sincerely,
G.N. Richardson & Associates, Inc.



Pieter K. Scheer, P.E.
Project Manager



Gregory N. Richardson, Ph.D., P.E.
President

cc: Rick Hester, Johnston County
Tim Broome, Johnston County
Haywood Phthisic, Johnston County
Rick Proctor, Johnston County
Ed Mussler, NCDWM

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary
Dexter R. Matthews, Director



January 25, 2002

Mr. Pieter Scheer
G.N. Richardson & Associates
425 North Boylan Avenue
Raleigh, NC 27603

RE: Permit to Construct Application, Johnston County MSW Landfill, Phase 4A, Permits 51-01 and [REDACTED]

The NC Division of Waste Management, Solid Waste Section (Section) has completed its review of the engineering portion of the permit to construct application for the above referenced facility. Rule .1603 (a)(1), of the NC Solid Waste Management Rules (15A NCAC 13B .1600), directs that an application for permit amendment shall be submitted as set forth in Paragraph (a) of Rule .1617. The section hydrogeologist has reviewed the Hydrogeologic Report section of the permit amendment application and sent a review under separate cover. The hydrogeologic section of the application has been determined to be complete.

When reviewing and editing comments on the quality assurance plan and/or the technical specifications, please ensure that both documents are consistent. Comments or questions on one section may not be duplicated for the other section, but could apply to both. Based on its review, the Section requests the following information:

FACILITY PLAN

1. Johnston County will need to provide a legal description of the property or properties that make up the facility, sufficient to record the permit against. Typically this is the deed with meets and bounds. If several properties have been previously consolidated and recorded, then that instrument may suffice.
2. 2.6.3 Leak Detection System. Are the pumps equipped to automatically pump the leak detection system, or is this a manual operation? If it is not automatic, what is the plan or procedure to check this system? How is the liquid removed measured? The removed liquid measurement should be recorded and included in the facility records that are kept. (See also operations plan/record keeping and Section 4 of the Facility Plan)
3. 4.4 Leachate Discharge and Storage System- Are the pumps automatic? How is the leachate volume measured? The removed liquid measurement should be recorded and included in the facility records that are kept. (See also operations plan/record keeping)

OPERATIONS MANUAL

4. The Solid Waste Section has modified Johnston County's landfill permit to provide for leachate recirculation in Phase 5, use of alternate daily cover, and to provide a procedure to spray irrigate reclaimed wastewater at the facility. Please consolidate the appropriate portions of the respective plans into one operations manual. The manual should also include the operation requirements for the C&D disposal area.

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5. 1.6.1 Fire Control- This Section should be expanded for the benefit of the owner/operator.
6. 2.4 Waste Screening- Is the number of vehicles inspected sufficient, such that it meets recommendations that 1-2% of the waste stream be routinely, randomly, inspected? What types of trucks are targeted for inspection? How is the random truck chosen?
7. 2.5.3-Cell Activation- It is recommended that a notation be placed in the facility operating record that the GT-S separator textile has been removed from the gravel columns, prior to activating the cell or subcell.
8. 2.7-Height Monitoring- How is this done or measured?
9. 3.3.1.3- What is the allowable discharge to the sewer treatment plant? Is a procedure needed to ensure that adequate draw down is performed in a timely manner in the advent of a hurricane or other tropical disturbance?
10. 3.3.3-Leachate Quality Sampling- Leachate must be analyzed for the listed parameters as well as Appendix I constituents (I assume that is what the metals and volatile scan refers to, please clarify) sulfates and nitrates. Leachate recirculation in Phase V requires more frequent leachate analysis. A plan should also be presented to the Section which contains a provision to collect samples from the leachate removal risers and not as a grab sample from the lagoon. Leachate data provided to the section, that has been drawn from the large volume storage facility, is not representative of leachate quality. All facilities are being required to upgrade their leachate sampling plans.
11. 3.3.4 Record Keeping - What records are kept and at what frequency?
12. 3.3.5- The Section should be notified in advance of any plan to store leachate in the landfill unit.

When submitting revisions to the application, the changed pages should be clearly identified with a revision date in either the header or the footer. It is not necessary to submit five copies of the revisions. Two copies will suffice. When the application is finalized and there are no more changes, then a total of five copies will be needed. The final version of the application should also contain an appendix with copies of correspondence and response to comments.

These comments are intended to expedite the review of the referenced application, and in no way do they restrict the Section's right to request additional information during the technical review process. If you have any additional questions or need help, please feel free to call me at (919) 733-0692 Ext. 343. My email address is : ed.mussler @ncmail.net.

Sincerely,



Edward F. Mussler III, P.E.
Environmental Engineer
Solid Waste Section

cc: Mark Fry, SWS
Jim Barber, SWS
Robert Hearn
Haywood Phthisic, Johnston County
File

North Carolina
Department of Environment and Natural Resources

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary
Dexter R. Matthews, Director



January 24, 2002

Mr. Haywood Phthisic
Public Utilities Director
Johnston County Department of Public Utilities
P.O. Box 2263
Smithfield, NC 27577

Re: Johnston County Landfill, Cell 4A, New Facility Designation, Permits 5101 and ~~5102~~ Site Study Approval

Dear Mr. Phthisic,

The Solid Waste Section (Section) of the Division of Waste Management has conducted review of the Cell 4A proposal at the Johnston County Landfill. The proposed development of Cell 4A qualifies the existing facilities (5101 and 5102) as a new facility. Rule .1603(a)(1)(E) defines a new facility as one that has a substantial change to the waste stream defined in the effective permit.

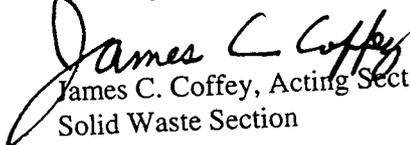
A permit to construct application for Cell 4A has been filed with the Section. Included in this permit application were demonstrations to update the existing site study of the landfill locale, in conformance with the Solid Waste Management Rules. A detailed site study was performed in 1995 for facility 5102 which is adjacent to the original landfill, 5101.

The Section has completed its review of the information submitted to update the site study report for the Johnston County Municipal Solid Waste Landfill Facilities, current permits numbers 5101 and 5102. Pursuant to Rule .1618(a)(1), Johnston County is hereby notified that the combined facilities, as proposed in the conceptual plan, are suitable for development as a solid waste management facility.

The Permit to Construct Application shall be prepared in accordance with 15A NCAC 13B.1617(a) and shall address the first five-year phase of landfill development. The Permit to Construct Application should be in general accordance with the conceptual plan shown in the Site Study.

Solid Waste Management Rule .0201 requires the Division to issue a solid waste permit in two parts. The first part is a Permit to construct and the second part is a Permit to Operate. This letter is not a permit. This letter only informs the applicant that they may proceed with their permit application. The final action the Division may take on a permit application is the issuance or denial of a permit. If you have any questions, please contact Ed Mussler at 919-733-0692, extension 343.

Sincerely,


James C. Coffey, Acting Section Chief
Solid Waste Section

cc: Pieter Scheer, P.E. GNRA
Jim Barber, DWM

Mark Fry, DWM
Robert Hearn, DWM

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William G. Ross Jr., Secretary
Dexter R. Matthews, Director

January 15, 2002

MEMORANDUM

To: Ed Mussler
From: Bobby Lutfy *BL*
RE: Johnston County - Phase 4A Design Hydrogeologic Report

The Johnston County Phase 4A Design Hydrogeologic Report has been reviewed and has undergone several revisions. With the most recent revisions of January 9, 2002, this report now meets the requirements of Rule .1623(b).

A replacement monitoring well, MW-8a, and a new monitoring well, MW-17, are to be installed to upgrade the ground-water monitoring system for Phase 4A. Well MW-17 is to be installed in the middle of the drainage feature immediately downgradient of Phase 4A. An additional surface water sampling location is to be added to the water quality monitoring system, SWPT-3. The leachate collection system and the leachate detection system are both also to be sampled semi-annually for the Appendix 1 list of constituents.

CC: Jim Coffey

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