



environmental engineers, scientists,
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December 2, 1994

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92-09	7/19/2011	DIN 14421

Mrs. Lula M. Melton, E.I.T.
Solid Waste Section
Division of Solid Waste Management
North Carolina Department of Environment,
Health, and Natural Resources
Post Office Box 27687
Raleigh, North Carolina 27611-7687



Subject: Response to Comments
Technical Review, Wake County-North Wake Landfill
Transition Plan, Permit No. 92-09

Dear Mrs. Melton:

This letter has been prepared in response to the North Carolina Dept. of Environment, Health, and Natural Resources (NCDEHNR) technical review letter dated October 18, 1994, and memorandum dated October 28, 1994 (sent by Mr. Bob Harding, WMS), with regard to the North Wake Landfill Transition Plan document. In order to assist the Solid Waste Section's review of this response letter, this submittal has been formatted to present both the NCDEHNR's exact comment of technical deficiency (in bold type) followed immediately by our response. In most cases, the response provides a stand-alone answer and the referenced transition plan sections and supporting documents and/or drawings have been modified accordingly, including specific page numbers where applicable.

We trust these responses and associated support documentation are sufficient for your review, however, if any additional questions should arise during the review process, please do not hesitate to call on us for further clarification or assistance. We appreciate your input and help in reviewing this Transition Plan document for the North Wake Landfill facility.

Sincerely,

CAMP DRESSER & McKEE

William S. Almes

cc: Phil Carter, Director, Wake County SW Management Division
Joseph F. Wiseman, Jr., P.E., CDM

Mrs. Lula M. Melton, E.I.T.
 Solid Waste Section
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**Summary of Revisions/Modifications and Instructions
 For Inserting Changes to Transition Plan Document**

NC DEHNR Comment	Section To Be Revised	Description of Revision or Instruction for Inserting into Existing Transition Plan Document
1	Section 10,	Remove existing Tables 10-1 and 10-2 and replace with revised Tables 10-1 and 10-2.
2	Section 7, Appendix A, Sect. 9.2	Remove existing page 9-2 and replace with revised page 9-2.
3	Section 7, Appendix A, Sect. 9.2	See comment 2.

SOLID WASTE SECTION COMMENT

- #1. **The Section's preliminary review involved evaluating the Wake County Landfill's Transition Plan against NC Solid Waste Management Rules, 15A NCAC 13B. Based on its preliminary review, the Section needs the following information. Rule .1629(b)(3) and .1629(c)(4) require Wake County to submit cost estimates for closure and post-closure. The transition plan includes cost estimates, but these closure and post-closure cost estimates do not include labor costs as separate line items. Therefore, please revise these cost estimates to include labor cost estimates.**

RESPONSE

The text and cost estimate tables contained in Section 10.0 - Closure and Post-Closure Cost Analysis and Summary have been modified. The closure and post-closure cost estimates now include labor costs as separate line items. A revised replacement copy of Tables 10-1 and 10-2 is attached as part of this response to comments package and should be inserted into all copies of the transition plan in place of the old version of Section 10.0. Refer to the above table for more detailed instructions in regard to replacing the old sections with the revised sections.

Mrs. Lula M. Melton, E.I.T.
Solid Waste Section
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SOLID WASTE SECTION COMMENT

- #2. **The plan appears to be adequate and complete however, under Section 9.2 of Appendix A, the plan states that the facility will utilize a front-end loader to spread the waste for the random load inspections. This should be done utilizing a hand rake to prevent the potential for a drum rupture and spill situation.**

RESPONSE

The text contained in Section 7.0 - Operations Plan, Appendix A - Waste Screening Plan, Section 9.2, page 9-2 has been modified to show that the waste should be hand-raked rather than using heavy equipment to spread the load. A revised copy of page 9-2 is attached as part of this response to comments package and should be inserted into all copies of the transition plan in place of the older version. Refer to the above table for more detailed instructions in regard to replacing the old sections with the revised sections.

SOLID WASTE SECTION COMMENT

- #3. **In addition, under this same section, the plan states that for unknown materials in sealed drums, properly trained waste screening personnel will open and inspect the materials. The County needs to clarify this statement to insure that landfill personnel are not opening sealed unknown drums without adequate Personal Protective Equipment (PPE) and training.**

RESPONSE

The text contained in Section 7.0 - Operations Plan, Appendix A - Waste Screening Plan, Section 9.2, page 9-2 has been modified to clarify the above statement to insure that landfill personnel are not opening sealed drums with unknown contents without adequate Personal Protective Equipment (PPE) and training. A revised copy of page 9-2 is attached as part of this response to comments package and should be inserted into all copies of the transition plan in place of the older version. Refer to the above table for more detailed instructions in regard to replacing the old sections with the revised sections.



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October 25, 1994

Ms. Lula M. Harris, E.I.T.
Solid Waste Section
Division of Solid Waste Management
North Carolina Department of Environment,
Health, and Natural Resources
Post Office Box 27687
Raleigh, North Carolina 27611-7687

Subject: Technical Review, Wake County-North Wake Landfill
Transition Plan, Permit No. 92-09

Dear Ms. Harris:

On October 20, 1994, our office received a copy of the Technical Review letter for the Wake County-North Wake Landfill Transition Plan, Permit No. 92-09. We would like to take a moment to inform you that we are currently in the process of addressing all outstanding issues necessary to satisfy your comments so that you may complete your review in a timely manner.

We fully understand that we must submit a complete response package to your technical review comments within forty-five (45) days of the date shown at the top of your letter (October 18, 1994). Based on our estimate, our submittal should be delivered to your attention no later than Friday, December 2, 1994.

It was a pleasure meeting you during our recent phone conversation last Friday and I appreciate your time spent in answering our questions. If the above deadline date does not meet your approval or should you require additional information during the next several weeks, please call me at (919) 787-5620.

Sincerely,

CAMP DRESSER & McKEE

William S. Almes

cc: Phil Carter, Director, Wake County SW Management Division
Joseph F. Wiseman, Jr., P.E., CDM