

Wilson, Donna

From: David Garrett [david@davidgarrettpe.com]
Sent: Thursday, September 30, 2010 9:23 AM
To: Wilson, Donna
Subject: RE: Remaining comments on Material Recovery Landfill application
Attachments: WCA Brownfield Post Closure Cost Estimate.pdf

Donna, this is a partial submittal on my responses to the captioned message based on our conversation yesterday. I would appreciate your review of the post-closure numbers and comment before I proceed further. Thank you. David

From: Wilson, Donna [mailto:donna.wilson@ncdenr.gov]
Sent: Monday, September 27, 2010 5:14 PM
To: David Garrett; gehle, dennis
Subject: Remaining comments on Material Recovery Landfill application

Dave – I've completed review of the revised application and response to comments for the last several submittals. The remaining comments are follows:

1. Section 1.1 – Please revise the following sentence as indicated: “In early 2008 the facility received a ~~5-year~~ permit to operate ~~renewal~~ for Phase 1.”
2. In several sections of the CQA it is implied that the text only applies to final cover installation. For example, see Section 6.1.1.1 – This section should apply to cell construction as well as final cover installation (two sentences). Section 6.3 should include the preconstruction meeting for cell construction. There are several more instances in the CQA Plan. Please correct.
3. CQA – Table 6A – Method ASTM D 4138 appears to be incorrect. Please list the requirement that the soils must be SC, SM, ML, CL, MH, or CH per the United Soil Classification System. Please add soil requirements for slope stability to the CQA Plan.
4. Closure Plan – Section 8.2 – Text should indicate the plan is for Phases 1 and 2A.
5. Closure costs – Gas vents should be 36.7 acres at 3 per acre.
6. Post-closure plan – Section 8.3.1.3 and Table 8B Note 3 – The plan for post-closure landfill gas monitoring should be consistent with the requirements of .0543 (e). The landfill gas remediation plan should be summarized.
7. Post-closure plan – Describe inspection and maintenance of groundwater and landfill gas monitoring wells, below grade stormwater piping, final cover gas vents, and frequency of inspection.
8. Post-closure costs – Please clarify calculation of annual cost for reseeding/mulching and monthly inspections. Please recheck multiplication and addition. Include maintenance/repair of fence, gate, sign, roads, and the below grade final cover stormwater piping and final cover gas vents. The unit cost for reseeding, mulching, and erosion repair seems low. After total cost, include cost per acre per year. List annual costs multiplied by 30 to determine the 30 year post-closure cost.
9. Financial assurance – Please see my email dated 9-17-10.
10. Please provide a copy of the revised 2008 and 2009 annual reports.
11. Drawing S2 – The label “North Disposal Area” should be adjusted.
12. Drawing E2 – On the first drawing, the base grade contours for Phase 2A should be updated to match the contours on Drawing E4. On the second drawing, the base grade contours for Phase 2B should be updated to match the contours shown on Drawing E4.
13. Drawing MP1 – Update the base contours in Phase 2A and 2B, or remove the base contour labels in those phases for this drawing only.
14. The compliance review portion of the application is not complete in that there is not a stand-by trust fund for the existing WCA financial assurance mechanisms (all WCA facilities). One stand-by trust fund may be used for all WCA facilities. Also, the existing financial assurance documents have not been adjusted for inflation for 2009 and 2010. Contact Donald Herndon to address this matter.

15. Wood waste processing area – Show both the processing area and storage areas on the diagram. What are the total dimensions of the processing and storage area? What is the end use of the processed wood material? Will it be distributed to the public? What equipment will be used for the operation? What is the maximum storage time for any wood material, unprocessed and processed? What is the plan for detecting and removing any unacceptable waste? Describe surface water control features, including run-on and run-off. Describe plan to control dust. Describe plan for fire prevention and actions to be taken in the event of an accidental fire. Address whether the operation will require a sedimentation and erosion control permit.

Please submit responses to comments as replacement pages to the application. Replacement pages should list the date the submittal was prepared, the revision number, and page number. Please provide two paper copies of the replacement pages, and one electronic copy of the complete application with the revised pages.

We request that the electronic copy of the response submittals be provided as one pdf document file, if possible. In the electronic copy, chapters or sections, figures, tables and appendices should be marked with bookmarks within the document and hyperlinked in the table of contents and within the text as appropriate.

When the staff review and application is complete, the report cover sheet should be modified to include revision or final dates, and the table of contents should be modified, as necessary.

If you have any questions or comments please let me know.
Thanks, Donna

Donna J. Wilson
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E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.

TABLE 8C
ESTIMATED POST-CLOSURE COSTS FOR PHASE 1 and 2A (in 2010 dollars)

Annual Events	Units		Unit Cost	Cost/Event	Annual Costs
Reseeding/mulching and erosion repair (Assume 10% cap, once per year) ¹	5	ac.	\$1,500	\$7,500.00	\$7,500.00
Mow final cap (twice per year)	37	ac.	\$25	\$ 925.00	\$1850.00
Maintain storm water conveyances and gas vents for final cover ⁴	1	ea.	\$2,000	\$2,000.00	\$2,000.00
Maintain access roads, gates, fences, gates, signs, buildings, ditches, ponds	1	ea.	\$2,000	\$2,000.00	\$2,000.00
Monthly inspection (“ride-through”)	1	ea.	\$200	\$ 200.00	\$2,400.00
Engineering inspection (annual basis)	1	ea.	\$1,500	\$1,500.00	\$1,500.00
Annual engineering report	1	ea.	\$1,200	\$1,200.00	\$1,200.00
Ground and Surface Water Monitoring sampling and analysis (semi-annual) ^{1,2}	15	ea.	\$250	\$3,750.00	\$7,500.00
Water quality evaluation and reporting ²	15	ea.	\$250	\$3750.00	\$7500.00
Landfill Gas Monitoring (quarterly) ²	1	ea.	\$1500	\$1500.00	\$6,000.00
Landfill Gas Reporting (quarterly) ²	1	ea.	\$1000	\$1000.00	\$4,000.00
Maintain Ground Water Wells (all) ²	1	ea.	\$500	\$500.00	\$500.00
Maintain Gas Monitoring Wells (all) ²	1	ea.	\$500	\$500.00	\$500.00
	Total Estimated Annual Cost (Real Cost to Owner/Operator)				\$44,450.00
	Total Annual Cost Subject to Post-Closure Financial Assurance				\$18,450.00

Notes:

1 Appendix I detection monitoring only; number of wells is based on the most recent facility plan prepared by David Garrett and Associates, dated September 2010

2 Covered by \$3M corrective action bond and may be deducted from the post-closure financial assurance

3. Four bar-hole punch locations and six landfill gas wells; sampling with gas detection meter

Wilson, Donna

From: Wilson, Donna
Sent: Thursday, October 07, 2010 4:13 PM
To: 'David Garrett'
Subject: RE: Remaining comments on Material Recovery Landfill application

David, I have just a few comments on the post-closure cost estimate (your email dated 9-30):

1. Please add contingency.
2. After total cost, include cost per acre per year.
3. Also list annual costs multiplied by 30 to determine the 30 year post-closure cost.

I'm reviewing your Oct. 1 email next. Thanks, Donna

Donna J. Wilson
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Solid Waste Section/Division of Waste Management/NC DENR
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