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SOLID WASTE SECTION
ASHEVILLE REGIONAL OFFICE

December 2, 2009

97-03 12 4 09 8989

Mr. Allen Gaither, EE II
North Carolina Department of Environment and Natural Resources
Division of Waste Management
2090 US Highway 70
Swannanoa, NC 28778

Re: Edits to O&M Procedures in Permit Application

Mr. Gaither:

I am attaching the revised Operation and Maintenance Procedures section of our permit application for landfill permit No. 97-03. This is submitted in response to your request to make minor editorial changes to the section based on recommendations from John Patrone of your office and is intended to replace the section sent in the original application package. The changes have been reviewed by our in-house engineer and are the same as those I sent via email for your review on December 1, 2009.

Please review and let me know if there is anything else we need to do to complete the permit process. Thanks for all your assistance with this permit package.

Sincerely,



Billy Thompson / Environmental Manager
Louisiana-Pacific Corporation
Roaring River, NC

Attachment

ADDRESS PO Box 98
Roaring River, NC 28669

TEL 336.696.3337
FAX 336.696.3443
WEB www.lpcorp.com

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Operation and Maintenance Procedures

Waste Route

Waste transport vehicles will enter the landfill area through the existing access road. Trucks will unload at the active end of the phase. Temporary access roads will be constructed, modified, and maintained as necessary for each phase of development. Access roads will be maintained as necessary for each phase of development.

Development of Phases

The proposed landfill will consist of three phases. The first phase is currently in operation and is located on the western portion of the footprint. The next two phases will progress in an easterly direction. The phasing progression has been designed to allow subsequent phases to build onto the existing phase with the limited need for the construction of new access roads. Each phase subsequent to the first phase will be ready for waste placement before the preceding phase reaches capacity. Capacity development in advance of disposal need will ensure continuous waste disposal operations and aid in eliminating time lost due to phase preparation. The phasing progression is shown on Sheet 5 of the engineering drawings.

Waste Handling and Placement

The ash and sludge will be stored in stockpile within the landfill footprint until they can be mixed with a bulldozer at approximately a 2:1 ratio based on projected generation rates. The mixture will be periodically spread and compacted with heavy field equipment into thin lifts over the active surface of the landfill.

Daily cover is not anticipated to be needed due to the consistency of the ash/sludge mixture and the use of the dust suppression/cooling water system as described in the next section.

Dust Suppression/Cooling Water

The existing water transport network will continue to be used to cool hot ash and minimize dust production. The existing fire suppression system consists of a number of sprinkler heads and fire houses supplying water piped from the mill to the landfill. This system runs continuously when hot ash is being placed in the landfill. The fire houses are stocked with hosing long enough to respond to brush fires in the surrounding vicinity in case of emergency.

Stormwater Monitoring

All surface run-on or run-off from the landfill will be directed to the sediment pond(s) or towards designated discharge locations. Water velocity will be slowed at the discharge locations by riprap in sufficient quantity and shape to minimize erosion downstream. Stormwater discharge from the sediment pond will be controlled by the spillway outlet pipe. The spillway outlet pipe will connect to an existing pipe that discharges downstream to another sediment trap. The pond is sized to retain the run-off from the 10-year frequency, 24-hour storm at the elevation of the principal spillway. The principal spillway has the capacity to carry a 25-year frequency, 24-hour storm event without overflowing into the emergency spillway. Stormwater management details are shown on Sheet 4 of the engineering drawings.

Landfill Maintenance

Pre-closure

During landfill operation, the landfill will be periodically inspected to check for and document evidence of erosion, run-on and run-off control measures, sediment basin structures, and integrity of the embankments surrounding the landfill. Erosion taking place on the landfill slopes will be repaired immediately and compacted in place using field equipment. Diversion berms will be inspected to make sure surface run-on is not reaching the waste material. Check dams will be inspected to make sure run-off water is being dissipated as designed and downstream erosion is not an issue. The sediment basin will be inspected to make sure the riser pipe and outlet structure are free of obstructions. If a significant amount of sediment has accumulated in the basin, the sediment will be mechanically removed and placed in the landfill.

All embankments and inactive covered areas of the landfill will be bush-hogged twice annually to remove trees and woody vegetation. This will help maintain the slope of the embankment.

Post-closure

After phase and final closure, the landfill will receive a periodic through to check for and document evidence of settling, subsidence, erosion and other potential failures of the final cover. These inspections will also encompass the perimeter berm, ditches, channels and sedimentation basins to ensure stormwater run-on and run-off is being properly routed. In addition, the landfill will be mowed, fertilized, and seeded as necessary. This will help to protect the final cover against erosion and maintain slope stability. Any vegetation that poses a danger to the integrity of the final cover, such as trees and woody vegetation will be removed.