



North Carolina Department of Environment and Natural Resources
Division of Waste Management

Dexter R. Matthews	Beverly Eaves Perdue	Dee Freeman
Director	Governor	Secretary

May 4, 2011

Mr. Kent Brandon
Solid Waste Director
PO Box 389
Roaring River, North Carolina 28669

Subject: Completeness & Engineering Technical Review
Roaring River MSW Landfill Facility
Wilkes County, Permit #97-04, Document ID No. 13657

Mr. Brandon:

The Division of Waste Management, Solid Waste Section (Section) has completed the review of the document titled *Roaring River Landfill, Wilkes County, North Carolina, Permit no. 97-04, Phase 4 Expansion, Volume 1* (DIN's 12824), *Volume 2* (DIN 12826) and *Volume 3* (DIN 12827). The documents were submitted on your behalf by Joyce Engineering, Inc. and were received in the Asheville Regional Office on January 31, 2011.

The submittal has been reviewed for completeness in accordance with General Statute 130A-295.8(e). A determination of completeness means that the application includes all required components but does not mean the required components provide all of the information that is required for the Section to make a decision on the application. The permitting activity fee has been paid and the components required by 15A NCAC 13B.1617(b) have been submitted so the application is deemed complete.

Based on this review, it has been determined the Section requires clarification or additional information in order to issue the Permit to Construct. Please provide a response for each of the followings items:

1. The Operation Plan, in accordance with 15A NCAC 13B.1625(b)(1)(D), must contain operation drawings that illustrate *leachate and stormwater controls for active and inactive subcells*. The operation drawings do not include all required items.
2. The Operation Plan, in accordance with 15A NCAC 13B.1625(b)(1)(E), must contain operation drawings that illustrate *special waste areas within the MSWLF unit*. Neither the operation drawings, nor the General Operating Conditions, make clear whether any special wastes, such as asbestos, will be placed in the disposal area.
3. The Operation Plan, in accordance with 15A NCAC 13B.1645(b)(1)(F), must contain operation drawings that illustrate *buffer zones, noting restricted use*. The operation drawings do not include all required items.

4. The Operation Plan, in accordance with 15A NCAC 13B.1645(b)(1)(G), must contain operation drawings that illustrate *stockpile and borrow operations*. The operation drawings do not include all required items.
5. Section 3.5, Special Wastes states *C&D waste that is not appropriate for recycling or mulching is currently disposed in the lined landfill*. It should be noted, C&D waste, including unpainted and untreated dimensional lumber, cannot be ground for mulch.
6. Bullet number three (3) of Section 4.6, Action Plan, lists *sludges* as an excluded waste although the facility is permitted to receive and co-dispose of wastewater treatment plant (WWTP) sludge. It should be noted, the facility must ensure the WWTP sludge received is analyzed and declared a non-hazardous waste as per (all parameters of) 40 CFR 261.24, "Toxicity Characteristic" and a non-liquid waste as per 40 CFR 264.314 and 265.314, "Paint Filter Liquids Test".
7. The Closure and Post-closure Plan, in accordance with 15A NCAC 13B.1629(b)(1)(B), requires *an estimate of the largest area of the MSWLF unit ever requiring the specified cap system*. There is nothing in the Closure and Post-closure Plan to indicate the largest area of MSWLF unit for closure.
8. The Closure and Post-closure Plan contains cost estimates for closure and post-closure in accordance with 15A NCAC 13B.1629(b)(3) and (c)(4). However, per the attached memorandum, Financial Assurance cost estimates must also include the potential assessment and corrective action costs in the minimum amount of \$3,000,000 as required by NCGS 295.2(h). It should be noted, some post-closure costs can be moved under the potential assessment and corrective action costs umbrella (contact me for further clarification).

If you should have any questions regarding this matter please contact me at (828) 296-4703, or by email at allen.gaither@ncdenr.gov .

Sincerely,



Allen Gaither
Environmental Engineer

Attachment: Financial Assurance Process for Solid Waste Management Facilities Memorandum dated October 12, 2010

cc: Mr. Stephen Cowie – Joyce Engineering
Mr. John Patrone – SWS/WSRO
Mr. Donald Herndon – SWS/RCO