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Permit No.	Date	Document ID No.
11-07	November 24, 2008	6276

November 20, 2008

Mr. Allen Gaither
Environmental Engineer
North Carolina Department of Environment and Natural Resources
Division of Waste Management
Solid Waste Section
2090 US Highway 70
Swannanoa, NC 28778

Subject: Buncombe County, North Carolina
Buncombe County Solid Waste Management Facility
Permit No. 11-07
Request for Interim Use of Posi-Shell

Dear Mr. Gaither:

On behalf of Buncombe County (County), CDM requests that the County be allowed to use Posi-Shell as an interim means of daily cover while the North Carolina Department of Environment and Natural Resources, Division of Waste Management, Solid Waste Section (SWS) reviews the Alternative Cover Material (ACM) Demonstration Reports and Revised Operation Plan submitted on June 13, 2008 and November 10, 2008.

Posi-Shell is an ACM that has been accepted by the SWS at other facilities. Understanding that the SWS's decisions are made on a case-by-case basis depending upon the results of the ACM demonstration period, we are not asking the SWS to extend full use of Posi-Shell to the County, but provide interim approval until the ACM demonstration report can be reviewed and a final decision is made. Should the SWS approve the use of Posi-Shell as an interim ACM; the County will use Posi-Shell daily, except during unfavorable conditions (i.e. periods of high wind and wet weather), and once per week, when 6 inches of soil cover material will be used.

Notwithstanding the current economic conditions, airspace is a premium and the County's Solid Waste Management staff has been directed by management to take all measures to increase the landfill airspace utilization factor and reduce operational costs, while maintaining compliance and continuing diligent housekeeping practices. As we all recognize, continuing the use of soil as the sole daily cover alternative, is accounting for valuable airspace. In addition, because the County is leasing the equipment required to apply Posi-Shell, the County is incurring costs that are irrecoverable unless the equipment can be utilized.



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Thank you for your consideration regarding this matter. Should you have any questions regarding this request, or need any additional information, please contact me at 919-325-3500.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'W. Michael Brinchek', written over a circular scribble.

W. Michael Brinchek, P.E.
Camp Dresser & McKee

cc: E. Mussler, NCDENR
A. Keller, NCDENR
J. Mears, BCGSD
K. Smith, BCGSD
J. Wiseman, CDM
C. Gabel, CDM
K. Yang, CDM