



North Carolina Department of Environment and Natural Resources

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Division of Waste Management

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SOLID WASTE SECTION

January 7, 2008

Mr. Jerry Mears
Buncombe County - Solid Waste Manager
85 Panther Branch Road
Alexander, North Carolina 28701

Subject: Technical Review Letter
Alternative Cover Material Demonstration Reports
Buncombe County, Permit #11-07, Document ID No. 6502

Mr. Mears:

The Division of Waste Management, Solid Waste Section (Section) has completed the technical review of the following documents:

- *Alternative Cover Material – Posi-shell and Tarps, Demonstration Report and Revised Operations Plan*
- *Alternative Cover Material – 30/70 Mulch/Soil Mixture, Demonstration Report and Revised Operations Plan*

In order to complete the technical review of the Operations Plan the following items require additional information or clarification:

1. Section 6.1, Daily Cover, states *the daily cover must be capable of allowing loaded vehicles to successfully maneuver over it after placement*. Is the tarp system capable of meeting this requirement?
2. Section 6.3, Alternative Daily Cover, does not list the requirement that the ACM shall not be used more than five consecutive days without placing soil over the previously filled areas. This was a requirement of the demonstration and, will therefore, be a requirement for the continued use of the ACM. The Section recommends soil-only cover on the last operational day of a working week.
3. Section 6.3.1.3, Cover System Application Procedures, states *the Posi-shell surface will be visually inspected on a daily basis for exposed waste and/or inadequate coverage*. How do you define inadequate coverage? The Application Minimum Requirements listed on page 11 of the Posi-shell Advanced Formulation Usage Guide lists a coverage thickness between 1/8inch and 3/16inch for overnight cover.
4. Section 6.3.2.1, Properties of Soil/Mulch Mixture, states *unacceptable material includes low carbon nitrogen wastes such as bulk grass clippings*. Since 'bulk grass clippings' are considered Yard Trash, the description of unacceptable wastes should include Yard Trash as defined in 15A NCAC 13B.0101(55).

5. Section 6.3.2.2, Cover System Application Procedures, states *using a wheel loader, combine one load of mulch and one load of soil*. Using this method yields a 50/50 mulch/soil mixture. The plan must describe the procedure used to create a 30/70 mulch/soil mixture.
6. Section 6.3.2.2, Cover System Application Procedures, states *mix soil and mulch load and visually verify that the mixture is adequately commingled*. How is adequately commingled measured?
7. Section 6.3.2.2, Cover System Application Procedures, states *the soil/mulch mixture will be stored on-site, outside the landfill limits, at a location determined by the County*. However, Andrea Keller was told the mixture was being prepared at the working face. The Operations Plan should accurately reflect the proper procedure for the mixing and storing the ACM.
8. Section 6.3.2.2, Cover System Application Procedures, states *the soil/mulch mixture wet weather operations will be similar to the operations the County currently follows when using soil as daily cover during wet weather*. The Operations Plan does not provide a procedure for the current wet weather procedure for daily cover.

Finally, regardless of the adequacy of the revisions to the Operations Plan, no modifications to the Permit to Operate will be allowed without complete resolution of the Notices of Violation listed in the Facility Compliance Audit Report dated November 3, 2008.

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

Sincerely,



Allen Gaither
Environmental Engineer

Cc: Kenton Yang – Camp, Dresser & McKee
Kristy Smith – Buncombe County
Andrea Keller – SWS/ARO