



North Carolina Department of Environment and Natural Resources

Division of Waste Management

Dexter R. Matthews
Director

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Secretary

SOLID WASTE SECTION

April 2, 2009

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

Subject: LFGTE Project – Intent to Issue Permit
Buncombe MSW Landfill, Cells 1 - 5
Buncombe County, Permit #11-07, Document ID No. 7133

Mr. Mears:

The Division of Waste Management, Solid Waste Section (Section) has reviewed the document titled *Landfill Gas to Energy Project, Request for Approval*, March 25, 2009. This document was submitted on your behalf by CDM and was received by the Section on March 26, 2009.

Based on this review, the Section is providing notification of our intent to issue a permit for the landfill gas to energy project. Construction of the project is pending receipt and approval of the following:

1. A technical discussion of the construction practices for drilling, excavation, backfilling, material and fabrication, waste disposal, control of nuisance odors, vectors and windblown material, personnel safety, decontamination of tools and machinery, testing protocols and frequencies, etc.
2. Design data and calculations to include slope of the lateral gas pipes as well as production and transport capacities of the system including the existing condensate recovery system.
3. If the generator set has been specified please provide a discussion of the safety mechanisms of the LFGTE system. This should include a by-pass to send LFG to the flare system if there is a problem with the LFGTE system.
4. A construction schedule and completion report to include, but not limited to:
 - a. A description of the tasks completed, party involved, material & equipment used, wastes disposal for this LFGTE project;
 - b. Landfill gas extraction well logs;
 - c. Pipe leaking test results;
 - d. Color photographs to show the major construction features;
 - e. Daily construction log/document and non-conformance or variance reports;
 - f. QA/QC testing results, if requested by the Technical Specification;
 - g. As-built drawings (surveyed-in locations of wells & valves);

- h. A copy of the updated air quality permit approved by the Division of Air Quality;
and
- i. Certification from a professional engineer registered in the State of North Carolina that the completion of construction meets the design specification and function.

A modification to the Permit to Operate will be issued pending receipt and approval of the following:

- 5. Payment of \$3000 permit activity fee.
- 6. Updated Operations Plan which incorporates the requirements and protocols of operation, inspection, monitoring, and maintenance of the landfill gas collection and control systems (LFGCCS) and landfill gas to energy system (LFGTE). In addition, the Plan should include emergency procedures covering, at a minimum, fire and inclement weather.
- 7. If the LFGTE and LFGCCS program will extend to the 30-year post-closure period, the costs associated with operation, inspection, and maintenance the program should be addressed in the Post-Closure Plan. Additionally, the post-closure care cost estimates and financial assurance mechanism should be revised accordingly.

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: Kristy Smith – Buncombe County
Kenton Yang – CDM
Ming Chao – SWS/RCO
Andrea Keller – SWS/ARO