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DEPARTMENT OF PUBLIC WORKS

November 1, 2010

Patricia Backus, P.E.
Environmental Engineer
NCDENR – Division of Waste Management, Solid Waste Section
1646 Mail Service Center
Raleigh, NC 27699-1646



Dear Ms. Backus,

Please find enclosed an updated Operations Plans for the Rocky Mount LCID. Amendments to the Operations Plan address those items raised in your September 29, 2010 memo. Specific responses to these items are noted below:

- 1. In your response, you stated that the second gate is unlocked and locked after each use. Please specifically state that in the Operational Parameters and Cite Security and Access Control Sections.**

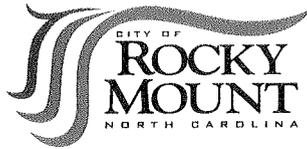
The Operations Plan has been updated as requested

- 2. Ensuring that the second gate is properly locked and conducting routine drive bys are key factors for not needing a trained employee on site at all times. These activities need to be documented. Please indicate that it will be documented and keep in your records.**

Language has been added to the Record Keeping section of the Operations Plan to clarify this requirement.

- 3. Information about the property deed information is now included in the LCID permits. Below is what I have based on our files and the county information I could access. Please check the accuracy and provide the acreage for the LCID, Phase VII. Can you provide a copy of the recombination plat?**

I do not have information regarding the acreage associated with the Cade and Evans Tree Farm parcels, but the recombination plat indicates that combined acreage is 395.91 acres. With regards to the footprint of Phase VII, the cell is approximately 6.3 acres. At full buildout, all seven phase of the LCID should comprise approximately 80 acres. This would include the seven cells and the anticipated stormwater control features. Regarding the recombination plat, I have enclosed a copy for your records.



- 4. Appendix A is outdated and some parts may be no longer valid. There are rules for Construction and Demolition (C&D) Landfills (15A NCAC .0531-.0547). If this helped your staff prevent C&D in the LCID, you may modify it. If you do not need it, you may eliminate it.**

The guidance provided by NCDENR in 1997 and included in Appendix A has been replaced with the revised guidance provided by your office on October 28, 2010.

I trust the responses above and the additional information provided in the updated Operations Plan for the Rocky Mount LCID Landfill, adequately address those issues identified in your September 29, 2010 correspondence. Should you require any additional information, however, please advise.

Sincerely,

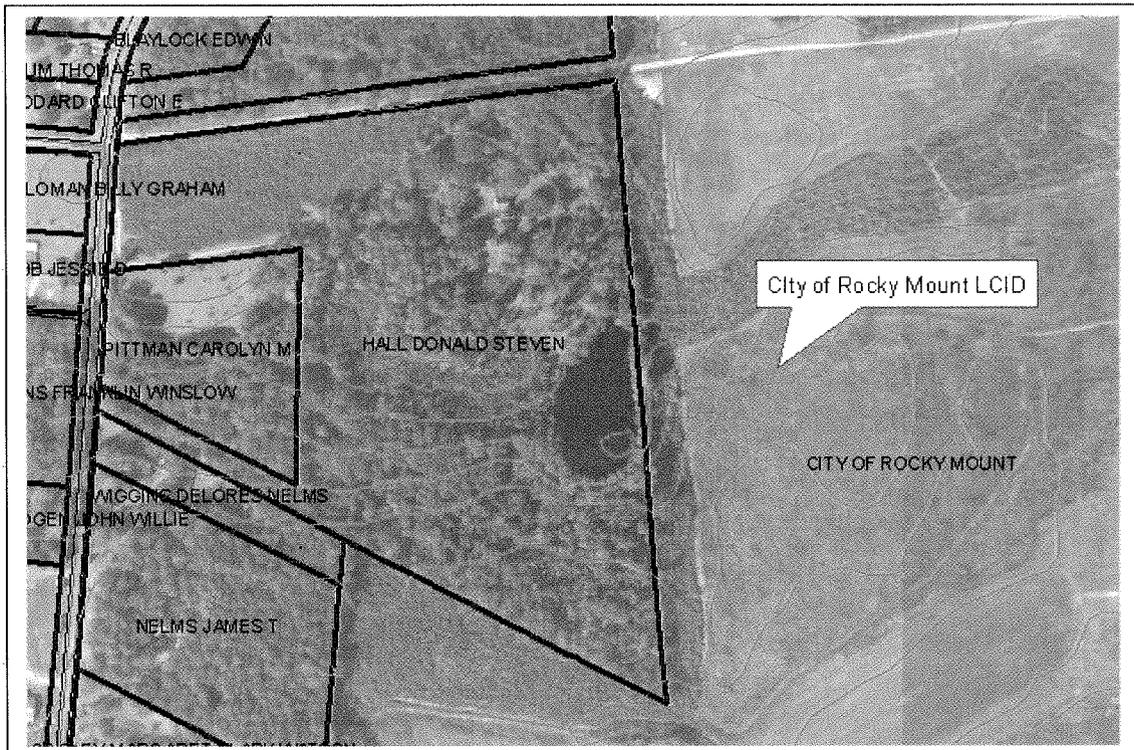
A handwritten signature in black ink, appearing to read 'Jonathan L. Boone'.

Jonathan L. Boone, P.E.
Director of Public Works
City of Rocky Mount

Enclosures

- C Ben Barnes – NCDENR Environmental Senior Specialist
Blair Hinkle – Assistant Director/Stormwater Manager
Ed White – Streets/Stormwater Superintendent

OPERATIONAL PLAN



CITY OF ROCKY MOUNT LAND CLEARING AND INERT DEBRIS (LCID) LANDFILL PERMIT # 33G

November 1, 2010

Facility Name and Address

City of Rocky Mount Land Clearing and Inert Debris Landfill (Phase VII)
3873 Old Battleboro Road
Rocky Mount, NC 27801

GPS Coordinates

N 35.99492 E 77.75092

Facility Contacts

Jonathan L. Boone, P.E.
Director of Public Works
City of Rocky Mount
331 South Franklin Street
Rocky Mount, NC 27804
(p) 252-972-1299
(f) 252-972-1173

Ed White
Street/Stormwater Superintendent
City of Rocky Mount
208 East Grand Avenue
Rocky Mount, NC 27801
(p) 252-467-4907
(f) 252-467-4905

Project Background

The Rocky Mount LCID Landfill was developed in order to provide for a single location to dispose of inert debris generated by city forces during the course of their duties. In addition to consolidating this material in one location, the LCID landfill was envisioned as a way to provide more oversight and control over the disposal of such waste and a mechanism by which to insure that disposal of such material was handled in a manner consistent with regulations promulgated by the State of North Carolina and administered by NCDENR.

While the landfill was designed in such a way as to provide a long term solution for the disposal of such waste by the City, it is the intent of the City to be judicious in its use in order to extend the service life of the facility and to divert waste that could be disposed of in a more cost effective manner from reaching the LCID (e.g. vegetative debris that could be processed at the Arrow Road compost site).

The permit to construct the LCID was issued on April 15, 2003 and the permit to operate the facility was issued on April 25, 2005. The facility was designed to be built out across seven (7) individual phases, providing a total disposal capacity of over 940,000 cubic yards. At present the City is operating in Phase VII which provides an estimated disposal capacity of 153,342 cubic yards. At current disposal rates, it is estimated that Phase VII will provide adequate disposal capacity for the City between now and the year 2030.

Material Accepted

Material accepted at the LCID will be as defined in 15A NCAC 13B 0560-0565. In addition to the guidance provided therein, the City of Rocky Mount and its operational Divisions will comply with guidance provided by NCDENR dated October 28, 2010 and incorporated into this document for reference as Attachment A.

In general, acceptable material would include land clearing waste, concrete, asphalt, brick, concrete block, uncontaminated soil, gravel, rock, untreated and unpainted wood, and yard trash. Yard trash would include yard maintenance items such as grass, tree limbs, and similar material. Unacceptable material for disposal at the LCID would include trash (paper or plastic), pipe, plywood, particle board, treated lumber, painted materials, siding of any type, shingles, furniture, buckets, roofing material, and metal.

Operational Parameters

Operational parameters for Phase VII of the LCID will be as follows:

- In general, the facility will be open Monday through Friday from 7:30 a.m until 6:00 p.m.
- The LCID will not be made available or accept waste from the public. Access to the facility is limited to City of Rocky Mount personnel or their agents disposing of waste generated in the course of carrying out their duties on behalf of the City.
- Access will be from Old Battleboro Road and controlled by means of a steel gate. Signs will be maintained at the entrance providing the contact name and number in case of an emergency and the permit number for the facility (33G).
- A secondary gate will be maintained at the point of access to Phase VII and signs posted to advise users of acceptable and unacceptable waste for disposal at the LCID. The gate shall be unlocked and then locked after each use.
- Routine drive by inspections will be conducted by Public Works personnel. Any violation of the disposal guidelines noted during these routine inspections will be relayed to the Department of Public Works for follow up.
- At a minimum, the Streets/Stormwater Division will insure that adequate soil cover is applied monthly for debris placed at the site or when the active area reaches one acre in size, whichever occurs first.
- Open burning of solid waste is prohibited.
- Addition of beneficial fill necessary to expand the disposal area within the Phase VII limits will be introduced as the footprint of the disposal area necessitates expansion.
- Within 1 to 2 years of the buildout of Phase VII, the City of Rocky Mount will pursue the permit(s) necessary to open the next phase of the LCID.

Leachate and Stormwater Quality

- To the degree possible, surface water will be diverted from the LCID via the use of perimeter diversion swales.
- The WWTP will maintain a rain gauge for the LCID.
- Adequate erosion control measures will be maintained on site to prevent silt from leaving the site and to prevent excessive erosion.
- Stormwater control features will be inspected on a weekly basis and within 24 hours of a 1/2" rainfall event. Said inspection will include recording a qualitative judgment of the clarity, floating solids, suspended solids, oil sheen, and other obvious factors indicative of stormwater quality.

Site Security and Access Control

Access to the LCID is controlled through the use of two gates. The first is located at the entrance to the City's property adjacent to the intersection of Old Battleboro Road and Fountain School Road and is opened in the morning and closed in the evening Monday through Friday. The second gate is located at the entrance to the only active cell in the LCID (Phase VII). This gate remains locked and is opened and then resecured by the employees using the LCID after each use. In addition to the gates, site security is provided through periodic visits by city staff and through weekly inspections of the site. The location of the LCID, located approximately 0.4 mile from Old Battleboro Road, also tends to discourage unauthorized use due to the lack of visibility and the distance required to access the site.

In order to discourage unauthorized access after hours, the gates are closed by personnel at the Wastewater Treatment Plant after 6:00 p.m. Monday through Friday and the gates remain closed on Saturday and Sunday.

Personnel Requirements

Only city staff and city authorized contractors are permitted to use the LCID. This site is not open to the public or outside contractors. For those departments with staff permitted to use the LCID, a briefing of the Operations Plan will be provided once approved by NCDENR. In addition, a copy of the plan will be posted at the site. In addition to training the appropriate personnel, an activity log will be maintained at the site to document activity at the LCID and to characterize the origin, type, and quantity of material received.

Record Keeping

At a minimum, Public Works personnel conduct routine drive-by inspections of the LCID (at least on a weekly basis) to check for inappropriate material, placement of adequate soil cover, adequate sedimentation and erosion control measures, to review activity recorded in the daily log, and to verify that an up to date copy of the Operations Plan is available on site. These inspections will be documented and retained in the on-site activity log. In addition to routine

inspections, personnel will also inspect the site after a ½ inch rainfall event or greater to inspect the stormwater control features and to characterize the quality of stormwater runoff. A copy of the inspection reports will be retained on site.

Other

WWTP personnel will conduct an annual methane check for the LCID

Emergency Contingency Plan

Edgecombe County and the City of Rocky Mount Fire Departments will respond to any emergencies associated with operation of the LCID. Circumstances requiring emergency response will be reported by staff or the general public through the use of 911 or based on contact information maintained at the entrance to the LCID. In the event access to the site is disrupted due to an emergency, each of the operating Divisions that utilize the City of Rocky Mount LCID will be advised of the temporary closure and the need to make arrangements with the Nash County or Edgecombe County Landfill to dispose of material destined to the LCID until the site is reopened.

Appendices

Appendix A – NCDENR Disposal Guidelines

Appendix B – Existing and Proposed Signage

Appendix C – Map of LCID (scale 1 inch = 150 feet)

Appendix D – Cross-section of Phase VII of LCID (currently active cell)

Appendix A

**CLARIFICATION OF MATERIALS ACCEPTABLE FOR DISPOSAL AT
CONSTRUCTION AND DEMOLITION SOLID WASTE LANDFILLS (C&DLF) AND
LAND CLEARING AND INERT DEBRIS LANDFILLS (LCID)**

This appendix provides clarification of the types of materials acceptable for disposal at a construction and demolition waste landfill and a land clearing and inert debris landfill and for processing at a yard waste facility.

Construction and demolition debris is defined in the statutes as waste or debris resulting solely from construction, remodeling, repair, or demolition operations on pavement, buildings, or other structures. Rules .0531 through .0547 of the Solid Waste Management Rules (Rules) (15A NCAC 13B) provide the regulations for C&DLF.

A C&DLF may accept asbestos waste for disposal as long as it is managed in accordance with Rule .0542 (c)(2) of the Rules. Hazardous or liquid waste may not be accepted for disposal in accordance with Rules .0542(e)(3) and (5).

The Solid Waste Section may approve industrial solid waste on a case-by-case basis for disposal in a C&DLF. Industrial solid waste is solid waste generated by manufacturing or industrial processes that is not a regulated hazardous waste. The requirements for the approval are addressed in Rule .0542(e)(4).

Land clearing waste is defined in the rules as waste that is generated solely through land clearing activities such as stumps, stumps, trees, limbs, brush, grass, and other naturally occurring vegetative matter.

A land clearing and inert debris landfill is defined in the rules as a facility for the land disposal of land clearing waste, concrete, brick, concrete block, uncontaminated soil, gravel and rock, untreated and unpainted wood, and yard trash.

Yard trash is defined as solid waste resulting from landscaping and yard maintenance such as grass, tree limbs, and similar vegetative material.

A yard waste facility is an alternative to landfill disposal where yard trash and land-clearing waste are processed into compost in accordance with the .1400 Rules for Solid Waste Compost Facilities.

Appendix B



LCID

Sign B (Proposed Sign 4)

Gate # 2 and Proposed Signs 1, 2, 3

Gate #1 and Sign A

OLD BATTLEBORO ROAD

Sign 1
MATERIAL ACCEPTED AT THE LCID

Land Clearing Waste	Gravel
Concrete, Asphalt, Brick	Rock
Uncontaminated Soil	Grass
Untreated, Unpainted Wood	Tree Limbs (limited)

Sign 2
MATERIAL NOT ACCEPTED AT THE LCID

Trash (paper or plastic)	Treated Lumber
Pipe (VCP, RCP, or plastic)	Painted Material
Plywood, Particle Board	Buckets
Siding, Roofing Material	Furniture
Metal	

Sign 3
NOTICE

All users should sign in using
the daily log maintained on site.
NO EXCEPTIONS.

Sign 4
CITY OF ROCKY MOUNT
LCID LANDFILL PERMIT NO. 33G
IN CASE OF EMERGENCY
CALL 972-1411 or 972-1290

LANDFILL IS NOT OPEN TO THE PUBLIC

Appendix C