



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

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

Solid Waste Section

July 1, 2010

Mr. David Jones, Director
Greene County Public Works
P.O. Box 543
Snow Hill, North Carolina 28580

Re: Additional Comments on Permit Application for Continued Operation (Application)
Greene County Construction and Demolition Debris Landfill (C&DLF)
Greene County, North Carolina
Permit No. 40-02, Document ID No. (Doc ID) 10988

Dear Mr. Jones:

The Division of Waste Management (DWM), Solid Waste Section has reviewed the May 20 2010 letter and attached Application (Doc ID 10705), submitted by Municipal Engineering Services Co., Inc. (MESCO), on behalf of Greene County, to respond the DWM's comments (Doc ID 8828) dated October 23, 2009. Based on the review Solid Waste Section has additional comments on the new submittal, and your responses to the following comments will expedite the review of the Application:

1. The Division has significant concerns regarding the incomplete responses to Comments 2 and 25 dated October 23, 2009. In compliance with Rule .0537(e)(1), (2), & (3), Greene County must provide **the Facility Plan** in the Application to detail the comprehensive development of the C&DLF – Phase 2 through Phase 7 as shown on Drawings F2 (Sheet 4 of 9) to F7 (Sheet 9 of 9).
2. The Division has additional concerns regarding the responses to Comments 2, 3 and 17 (Part 3) dated October 23, 2009. According to the submitted facility drawings and the response to the Comments 2, Greene County C&DLF will be developed by 5 phases (Phase 2 thru. Phase 7) in next 30 more years (as of 05/08/2009) with approximately total capacity of 531,307 cy (including 409,284 cy un-used space). However, according to the previously approved Facility Plan in the “Construction & Demolition Landfill for Greene County” dated December 1, 1997, the originally approved total capacity is 352,500 cy. The proposed landfill capacity (531,307 cy) will increase 50% more than the originally approved one (352,500 cy), and it is a substantial permit amendment [NCGS 130A-294(b1)(1)]. Therefore, Greene County must submit substantial permit amendment application in accordance with Rules .0533(a)(3), .0535(c), and .0537 – Facility Plan for the C&DLF.

Section 1 – Operation Plan

3. (Section 1.2, Operation Requirements – 1. Waste Acceptance and Disposal Requirements)

Please address the following concerns:

- i. (On page 6) There is a typographic error in paragraph f. Please change “except” to “accept.”
- ii. To clarify the waste stream that can be accepted in the Yard Waste Area for processing and treatment but not for disposal, please add the following requirements to the Item i (on page 7) or address the concerns as described below:
 - a) Please add the following requirements to the Item i: Yard trash as defined in NCGS 130A-290, shall not be disposed in the landfill area. However, yard trash, along with land-cleaning debris and wooden pallets, may be accepted for processing in the “Yard Waste Area” as shown on Drawing CD1, Sheet 3 of 8.
 - b) Please define the yard waste (type) facility according to Rule .1402. Greene County proposes to store waste up to 50 tons at any time in the facility. Please also describe the facility size (how many acres) and the maximum volume in cubic yard at any time. If this facility is defined as “Small Type 1” facility, please address that the facility meets the requirements stated in Rule .1402(g)(3).
 - c) Yard Waste Area shall follow the operation requirements stated in Rule .1406. Please pay special attention to the time and temperature requirements dependent on the type of the facility (Such as for Type 1 facility, the waste compost process shall be maintained at or above 55 degrees Celsius [131 degrees F] for 3 days and aerated to maintained elevated temperatures).
 - d) Provide the classification and distribution of the final products according to Rule .1407.
 - e) The maximum volume or weights of scrap or used tires that can be stored on site at any give date. Will the tired be stored in the trailers or on the ground? If tires stockpiled on ground, Green County must address the BMPs for prevention surface water/ runoff from contacting wastes.
 - f) Please add the following requirement to the Item i: “*White goods collection area shall provide for the proper removal of chlorofluorocarbon refrigerants by well-trained personnel.*”
 - g) The information of the companies that have contacted to Green County to haul and distribute/recycle the yard waste, white goods, scrap tires must be placed in the operating record.
- iii. The DWM Facility Compliance Audit Report that concluded the findings of the November 4 2009 site inspection indicated Green County manages an electronic recycling program at this C&DLF. The collected electronic wastes (e-wastes) are currently stockpiled on the ground without any barrier. Please address the following concerns and incorporate the responses to the Operations Plan:
 - a) To avoid any potential hazardous wastes in the discarded e-wastes contaminating environment, Greene County must temporary store the e-wastes in covered containers or in containers housed in a covered structure which shall be labeled or tagged for acceptable waste streams.

- b) Show the e-waste collection area on the facility plan and operation plan drawings.
- c) Describe the maximum amount of e-wastes will be stored on-site at any day, the acceptable e-waste streams, and e-waste separation plan, if applicable.
- d) The information of the companies that have contacted to Green County to haul and distribute/recycle the e-wastes must be placed in the operating record.

Please reference the proposed law - SB 887 also HB 1761 in 2010 for operating e-wastes in the State of North Carolina and incorporate the applicable rule requirements to the day-to-day waste management practices.

- iv. The DWM Facility Compliance Audit Report that concluded the findings of the November 4 2009 site inspection indicated that Greene County utilizes a dumpster on top of the landfill to collect non-C&D wastes. Please address the following concerns and incorporate the responses to the Operations Plan:
 - a) How are the collected non-C&D wastes disposed off or recycled?
 - b) When, where and how will the dumpster be emptied?
 - c) Will this dumpster be always staged in the fixed location or moved along with the progress of the working face? Please clarify. In addition, if the dumpster is located in the fixed location, please show the location on the operation plan drawings.
- 4. (Section 1.2, Operation Requirements – 5. Air Criteria and Fire Control, on page 8) For approval of open burning, please add the following new requirement (in italic format) to the end of second sentence in Part 5.b. *“Prior to any burning, a request...for review and approval. In addition, the Division of Air Quality and local fire department must approve the activity prior to burning.”*
- 5. (Section 1.3, Ground Water and Surface Water Sampling and Analysis Plan) Please address the following concerns:
 - i. (On page 11) Please add the reference of the guidance document - “Solid Waste Section Guidelines for Groundwater, Soil, and Surface Water Sampling.” Revised April 2008.
 - ii. (On page 12) Please add sampling equipment for field testing of turbidity and dissolved oxygen and carbon dioxide listed in the Table on page 11.
 - iii. (On page 15) Please add analyte in Appendix II to the first sentence on page 15.
- 6. (Section 1.4, Explosive Gas Control Plan) The number of existing monitoring points is not consistent between this Section (9 gas probes) and those shown on the drawings (11 gas probes) and the one in Appendix C of the Corrective Action Plan (12 gas probes). Please make necessary corrections.

Figures

- 7. The identification number of methane probe MP4 are repeatedly shown at two differently probe locations throughout all drawings in the Application. Please correct this typographic error.

8. The methane probe, MP9 is not shown on any drawing throughout the Application which is inconsistent with the drawing of methane probe locations in Appendix C of the Corrective Action Plan approved February 16, 2010. Please make necessary correction.

Section 4 – Financial Responsibilities

9. According to the DWM record, the Solid Waste Section has approved Greene County financial assurance on February 5, 2010. Therefore, the approved document including the local government financial assurance test for fiscal year 2009 and DWM approval letters must be included in Section 4.

Please timely respond the above-referenced comments and submit the Solid Waste Section a revised portions of the Application (one hard copy and an electronic copy), which incorporates the requested information. The Solid Waste Section appreciates your efforts and cooperation in this matter. If you have any permitting questions, please contact me at (919) 508- 8507.

Sincerely,



Ming-Tai Chao, P.E.
Environmental Engineer II
Permitting Branch, Solid Waste Section

cc:

Wayne Sullivan, MESCO
Donna Wilson, DWM
Ben Barnes, DWM

Ed Mussler, Permitting Branch Supervisor
Dennis Shackelford, DWM
Central File