



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

November 4, 2011

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) 15527

Dear Mr. Jones:

On October 17, 2011, the Division of Waste Management (DWM), Solid Waste Section received the letter dated October 14, 2011 and the revised portions of the Application (Doc ID 15496), submitted by Municipal Engineering Services Co., Inc. (MESCO), on behalf of Greene County, to respond the DWM's comments (Doc ID 10988) dated July 1, 2010. After conducting a review on the new submittal, I have additional comments stated below, and your responses to the following comments will expedite the review of the Application:

Operation Plan

1. [Section 1.1 –Introduction] In addition to C&DLF, please also describe the other waste management units mentioned in the Application, such as closed unlined MSWLF, used/scrap tire collection area, white goods/scrap metal area, Small Type 1 Composting Area, e-wastes collection area, etc.
2. [Section 1.2 - Paragraph 1. h.xiv. (on Page 6)] The Storm Debris Area is a permitted “temporary” storm debris storage and/or processing area which can only be operated after a natural disaster occurs in the service areas. The duration for operating this unit is six months only. This unit is not a waste disposal/ landfill unit; therefore, please add “(when it is permitted for operation)” next to the Storm Debris Area.
3. [Section 1.2 - Paragraph 1. 1. (on Page 7)] Please provide the following info of the white goods collection area, such as
 - i. The dimensions of the area or pad.
 - ii. If the scrap metal will be stored in this area, please add the scrap metal to the waste stream.

- iii. Please indicate that the recyclable is stored on the elevated pad such as concrete pad or on the ground.
 - iv. If the Freon will be removed from the white goods at the time of off-site removal, the Freon containing white goods must be separately stockpiled from no-Freon containing white goods and scrap metals. Please clarify.
4. [Section 1.2 - Paragraph 1. 1. (on Page 7)] According to the aerial photo provided by the Google Map, there are apparently two trailers located at same the area designated as “tire trailer “on Drawing No. F1/Sheet 3 of 7. Therefore, please provide the info of the used tire collection area, such as the physical features of the tire collection area, and the number of trailers and the maximum volume or weights of scrap or used tires that can be stored on site at any give day.
 5. [Section 1.3 (on Page 14)] Please add “and Appendix II” after “Appendix I” and “constituents” after “list” in the last sentence.
 6. Section 1.6 – Small Type -1 Composting Plan:
 - i. According to Rule 15A NCAC 13B .1402(f)(6), the Small Type 1 Composting facility must occupy an area less than or equal to 2 acres. Please add this requirement to the Section 1.5.
 - ii. Please add “the operation of Small Type-1 Composting Facility will abide by the requirements stated in Rules 15A NCAC 13B .1406” to this section.
 - iii. Please provide the soil testing results or soil boring data to demonstrate that vertical separation requirement stated in Rule 15A NCAC 13B .1404(a)(10)(B) is fulfilled.
 - iv. Please add “3” affront of days in item 11.
 - v. To demonstrate the operational requirement set forth in Rule 15A NCAC 13B .1406(10) will be properly implemented, please provide the information of the frequency, instrument, and documentation (shall be placed in the operating record) of temperature measurement activities.
 - vi. Please provide the info of the use or application the final product from the composting area such as landscaping, on-site erosion control, etc.

Facility Plan

7. The “Written Facility Plan” is located in Appendix E, not Appendix D. Please correct this typographic error.
8. To be consistent with the final soil cover design as described in the Closure Plan, please delete “drainage layer” in the second paragraph of the “General” Section, on Page 46.
9. The Rule 15A NCAC 13B .0537(e)(2) defines the gross capacity as the volume of the landfill calculated from the initial waste placement through the top of the final cover, include any periodic cover. Therefore, the total gross capacity of the C&DLF will be 434,135 cubic yards (cy), the sum of the total air space of 352,500 cy permitted in 1997 and the volume of the final soil cover system of 81,635 cy. Please change the value of total gross capacity of the C&DLF to 434,135 cy at the first sentence of the third paragraph of “General” section, on Page 46 and describe how the total gross capacity is derived from.

10. In the Facility Plan, please describe the C&DLF **service area** and the **waste disposal rate** – daily (based on the working day per year) and annually - e.g. ton per day and ton per year approved by the Lenoir County Board of Commissioners [Rule 15A NCAC 13B .0537(e)(1)(B) &(C)]. The historical records indicate that the annual C&D waste disposal rate of 3,000 tons per year was described in the approved 1997 “Site and Construction Transition Plan.” The landfill service area is Greene County. If the aforementioned info is not subject to change in the future, please reiterate the info in the Facility Plan.
11. The life expectancy calculation is based on the rate of 12,941 cubic yards per year, for the first year and an annual increase of 3.1% for each year thereafter. Please also provide this annual rate of 12,941 cubic yards per year in unit of “**tons per year**.”

Drawings

12. (Drawing No. F1/Sheet 3 of 7) Because the total gross capacity of the C&DLF is 434,135 cubic yards (Referring to Comment No. 9). The tabulated value of “C&D Unit on top of closed MSW Unit (remaining as of 5/8/2009) will be 312,112 cy, the difference of 434,135 cy and 122,023 cy. Please update the value on the drawing.
13. (Drawing No. CL3/Sheet 5 of 5) The specified stone is NC DOT No. 5, not # 57 stone shown in the permanent methane trench detail. Please correct this typographic error.

The Solid Waste Section approved the Assessment of Corrective Measures for the C&DLF dated August 30, 2007. In the approval letter, the Solid Waste Section requested the County to conduct a public meeting to discuss the assessed corrective measures with affected and interested parties in compliance with Rule 15A NCAC 13B .1635(d). The copies of documentations of the requested public meeting are not appended in the Corrective Action Plan (CAP) and can't locate in the DWM file system, either. Please submit the copy of the public meeting records stated in the Rule 15A NCAC 13B .1635(d).

On October 29, 2010 the Solid Waste Section requested the County to submit an updated CAP to reflect corrections and changes in design presented in the existing CAP dated February 25, 2009 and revised through February 12, 2010. The updated CAP is not available in the DWM file system. Please submit the update CAP.

Please submit the requested documents and timely respond the above-referenced comments which shall be incorporated into the revised Application. One hard copy and an electronic copy for each submittal are required. The Solid Waste Section appreciates your patience, efforts, and cooperation in these matters. If you have any permitting questions, please contact myself at (919) 707-8251.

Mr. David Jones
November 04, 2011
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Sincerely,

A handwritten signature in black ink, appearing to read 'Ming-Tai Chao', written in a cursive style.

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

cc:

Wayne Sullivan, MESCO
Dennis Shackelford, DWM
Central File

Ed Mussler, Permitting Branch Supervisor
Ben Barn, DWM