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

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

October 29, 2010

Ms. Jeryl W. Covington, P.E., Director
Environmental Services Department
P.O. Box 3136
Greensboro, NC 27402-3136

Re: Application for Continued Operation
City of Greensboro, White Street Construction and Demolition Landfill (C&DLF)
Guilford County, Permit No. 41-03, Document ID No. 11973

Dear Ms. Covington:

This letter is a revision of the letter issued on December 4, 2008, (DIN 6334) concerning the application submitted for the continued operation of the City of Greensboro, White Street C&DLF, Permit 41-03 per 15A NCAC 13B .0547.

Since then, the Corrective Action Plan and Water Quality Monitoring Plan have been approved. This letter addresses the remainder of the requirements of Rule .0547.

Operations Plan

Rule .0547(4)(b) requires the application to contain an operations plan in accordance with Rule .0542, including a five-year phase of development and a waste acceptance plan in accordance with the existing permit.

1. Section 1.0 Introduction – In the previous permit it was stated that land-clearing debris, inert debris, and asphalt were approved in addition to C&D waste. Therefore, you may state that it “has” been approved rather than it “may” be approved.
2. Fig. 2 – The sign must also list municipal waste as an excluded waste. [Rule .0542(j)(6)]
3. Drawing CD-77B – Please provide a legend to indicate what the different line styles represent.
4. Drawing CD-78B – Please provide a legend to indicate what the different line styles represent. It also does not appear to illustrate the difference between current waste placement and closed MSW as stated in Section 10.0 of the Operation Plan.
5. A cross-section drawing relating to the fill plan should also be provided.

6. Estimates of volume and weight for waste and cover and of remaining airspace should be included based on the fill plans.
7. Six inches of earthen material is required for the conditions listed in Section 12.1. Please specify this in the plan.
8. Intermediate cover must be applied on areas which will not have waste on them for three months or more rather than twelve months. Please make this correction. [Rule .0542 (f)((2)]
9. The Operation Plan should also specifically address disease vector control. [Rule .0542(h)].
10. In Section 13.3, please include the specific reporting requirements listed in Rule .1626 (4)(c) (ii) and (iii) for when methane gas levels exceed the limits.
11. Section 14 – The content of the written notification for fires and explosions is more specific in Rule .0542 than in Rule .1626. Please include the content requirements in the last paragraph.
12. In Section 18.0, NPDES stands for National Pollutant Discharge Elimination System.
13. Please update the phone number for the Winston Salem office in the Hazardous Materials Contingency Plan in Appendix C. It should be 336-771-5000.
14. Record keeping (Section 22.0) should also include any cost estimates and financial assurance documentation required under Rule .0546. [Rule .0542(n)]
15. In addition, I reviewed your permit issued May 25, 2006, for permitted solid wastes. Please note that we no longer use the term “C&D like waste” because there is not a statutory or regulatory definition. Waste from a manufacturer is industrial solid waste and must not be disposed in a C&DLF unit unless a demonstration has been made and approved by the Division. [Rule .0542(e)(4)] If you have a specific waste stream that was accepted under the term, please provide specific information on the waste and source and it may be included as an exception.

Closure and Post-Closure Plan

Rule .0547(4)(d) requires the application include a closure and post-closure plan in accordance with Rule .1627. In accordance with this rule, the owner or operator must develop specific plans under Rule .1629. Construction requirements for the cap system must incorporate specific requirements from Rule .1624.

16. In the second paragraph of the 1.0 Closure section, it is stated that closure will proceed and continue in compliance with Rule .543. The correct Rule is .1627. Please correct the title also.
17. The closure plan did not address the time requirements to begin and complete closure activities stated in Rule .1627(c)(5) and (6).

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18. The closure plan did not include all of the minimum content requirements listed in Rule .1629(b).
19. The closure plan did not include the design and construction requirements. The closure plan stated that "a cap system will be designed". You may submit the original closure plan for this section.
20. The post closure plan did not include all of the minimum content requirements listed in Rule .1629(b).

An invoice will be sent to you for the permit fee. The fee will be for a permit amendment of a C&DLF receiving 100,000 tons per year or less. Please follow the directions on the invoice for payment so that it is properly credited.

If you have any questions, please contact me at (919) 508-8520 or by email at pat.backus@ncdenr.gov.

Sincerely,



Patricia Backus, P.E.
Environmental Engineer
Solid Waste Section

cc: Ed Mussler, DWM
Hugh Jernigan, DWM

Jason Watkins, DWM
Jeff Skabo, DWM