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Backus	02/07/2011	12860	41-12



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

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

February 7, 2011

Mr. Dale Wyrick, P.E., Interim Director
Environmental Services Department
City of Greensboro
P. O. Box 3136
Greensboro, NC 27402-3136

Re: Application for Continued Operation
City of Greensboro, White Street Landfill – Phase III
Guilford County, Permit No. 41-12, Document ID No. 12860

Dear Mr. Wyrick:

The Division of Waste Management, Solid Waste Section (Section) has reviewed your request for a permit amendment to continue operation of the City of Greensboro, White Street Landfill – Phase III, Municipal Solid Waste Landfill (Permit No. 41-12). The application was received at the Winston-Salem Regional Office on January 14, 2010.

The following are questions or comments on the Operations Plan (Plan) submitted as part of the application.

1. Please include the permit number on the title sheet for the Plan. When referring to the White Street Landfill, it would also be helpful to include the phase number.
2. The introduction of the Plan indicates there are operational drawings, but none were provided. Drawings should be provided that address existing conditions and development for the next five years. If there is no change, include copies of the previously approved drawings. Estimates of volume and weight for waste and cover and of remaining airspace should be included based along with your fill plan.
3. The footer on the pages of the Plan state “Construction Plan Report” and “Final Report – January 14, 2010”. This may have been part of a previous report, but in this instance it more appropriate to refer to is as an Operation Plan.
4. Page 8 - The phone number for the Winston-Salem office has changed. It is (336) 771-5000. (Note: It is correct on page 3 of the Hazardous Materials Contingency Plan.)

5. Page 8 - Please change text to reflect the current name of the department and division. (Department of Environment and Natural Resources, Division of Waste Management) Scan the Plan and correct in other places if applicable.
6. Page 20 – 1.8.3 1: b: the rule reference should be .1626 (4).
7. Page 21 – Personnel were certified as of 1995. CPR certification is good for two years. Please indicate how CPR certification applies now.
8. Asbestos waste is listed as a prohibited waste type on page 9, yet in the last paragraph of section 1.10, fiber drums containing asbestos are mentioned.
9. Page 23 – Last paragraph makes reference to Section 11.0. I could not find that Section. Please check.
10. Section 1.13 Leachate Management – Please update to reflect requirements of NCGS §130A-295.6 (h) (3).
11. Please check the Plan for items that were planned when originally written but are now in place.
12. Estimates of volume and weight for waste and cover and of remaining airspace should be included based along with your fill plan for the next five years.

An invoice has been sent to you for the permit fee. The fee is for a permit amendment of a MSWLF 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: Joe Readling, P.E., HDR Engineering
Mike Plummer, P.E., HDR Engineering
Ed Mussler, PE, Permitting Branch Head
Jason Watkins, Central District Supervisor
Hugh Jernigan, Environmental Senior Specialist