



## North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor  
William G. Ross Jr., Secretary

### SOLID WASTE SECTION

December 10, 2008

Mr. Stephen King  
Haywood County Solid Waste Director  
278 Recycle Road  
Clyde, North Carolina 28721

Subject: Technical Review Letter  
Modifications to Operations Plan  
White Oak MSW Landfill  
Haywood County, Permit #44-07, Document ID No. 6371

Mr. King:

The Division of Waste Management, Solid Waste Section (Section) has completed a technical review of the document titled *White Oak MSW Landfill, Haywood County, North Carolina Modifications to the Operations Plan*, revised September, 2008. The document, Document ID No. 6013, was submitted on your behalf by McGill Associates and received by the Section on October 15, 2008. The following items require additional information or clarification:

#### Operational Requirements

- 1) Section 2. Cover material requirements Part b states: *the mulch ADC will consist of one and one-half (1-1/2) inches of mulched material combined with four and one-half (4-1/2) inches of soil.* The mulch/soil material must be thoroughly mixed in order to be used as an ADC. The procedure for mixing/ hauling and distributing the mulch/soil ASC should be included in the Operations Plan.
- 2) Section 12. Leachate management plan Part a states: *Haywood County will periodically maintain the leachate collection system.* Due to recent failures of leachate collection systems in the State, the Section is requesting more detail regarding maintenance of the systems. The Section would recommend jet-cleaning and inspecting the lines with a camera annually. Please indicate how you will determine and ensure functionality of the leachate collection system.
- 3) The Demonstration Report for the polypropylene tarp ADC in Appendix 2 is satisfactory for approving the use of the tarps as an ADC. However, the Synthetic Cover Operations section outlines the system used during the demonstration period for the application of the tarps. I would prefer the procedure be revised if necessary and added to the Cover Materials Requirements of the Operations Plan.
- 4) The Conclusions Section of the Demonstration Report for the polypropylene tarp ADC in Appendix 2 states: *Haywood County will continue to use the plastic panel cover that is currently approved to cover the working face of stacked bales.* I can find no other reference to the plastic panel cover system in the Operations Plan or in the current Permit to Operate. Please provide documentation demonstrating this ADC is approved by the Section. Also, assuming the plastic panel cover system is approved, the procedure for managing this ADC should be provided in the Cover Materials Requirements of the Operations Plan.
- 5) Appendix 4 is duplicated in the Operations Plan.
- 6) Part A. Overview of Section III. Operations Procedures for the Mulching and Grinding Treatment and Processing Facility in Appendix 5 states: *White Oak Landfill averaged 100 tons per month of wood mulch, brush, and yard waste.* However, yard waste as defined in 15A NCAC 13B.0101 must be composted as required by 15A NCAC 13B.1401 prior to use. Please specifically define the types of materials for

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- mulching to ensure they meet with the regulatory requirements. In addition, a description of waste screening practices should be included to ensure yard waste is not commingled with the material to be mulched.
- 7) Part C. Technical Operational Requirements bullet number 1) of Section III. Operations Procedures for the Mulching and Grinding Treatment and Processing Facility in Appendix 5 should also be revised to specifically define the types of materials for mulching to ensure they meet with the regulatory requirements.
  - 8) Part C. Technical Operational Requirements bullet number 8) of Section III. Operations Procedures for the Mulching and Grinding Treatment and Processing Facility in Appendix 5 states: *only clean, unpainted masonry, concrete, and asphalt may be ground for use as road base and ditch lining material.* Only material that qualifies as Beneficial Fill as defined in 15A NCAC 13B.0562 may be used in this operation. A description of the plan to segregate and manage this waste stream must be included in the Operations Procedures. Any material that does not meet the definition of Beneficial Fill will be considered Construction and Demolition Debris waste and must be managed accordingly.
  - 9) Section II. Siting Requirements for the Small Type 2 Composting Facility in Appendix 6 does not mention the groundwater requirements in 15A NCAC 13B.1404(a)(10). Please revise this Section and provide information to demonstrate the regulatory requirements have been met.
  - 10) Part C. Technical Operational Requirements bullet number 8) of Section III. Operations Procedures for the Small Type 2 Composting Facility in Appendix 6 lists the temperature and time requirements for Type 1 compost material. Please revise this line item for the temperature and time requirements of Type 2 compost material. In addition, a discussion of compost management to include turning, windrows and collection of monitoring data should be provided.

In general, the Section would like to see more thorough and detailed documentation of all procedures necessary to manage all solid waste activities at the facility. The Operations Plan is a living document that should be updated and revised if any management procedures are changed.

If you should have any questions regarding this matter please contact me at (828) 296-4703.

Sincerely,



Allen Gaither  
Environmental Engineer

Cc: Dave Pasko – McGill Associates, P.A.  
Jeff Bishop – McGill Associates, P.A.  
Andrea Keller – SWS/ARO