



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

March 18, 2011

Mr. Tom Miller
Solid Waste Director
P.O. Box 3289
130 S. Queen Street
Kinston, North Carolina 28501

Re: Additional Comments on the revised Permit Application for Continued Operation
(Application)
Lenoir County Construction and Demolition Debris Landfill (C&DLF)
Lenoir County, North Carolina
Permit No. 54-03, Document ID No. (Doc ID) 13300

Dear Mr. Miller:

On March 3, 2011, the Division of Waste Management (DWM), Solid Waste Section received the letter dated March 2, 2011 and the revised portions of the Application (Doc ID 13128), submitted by Municipal Engineering Services Co., Inc. (MESCO), on behalf of Lenoir County, to respond the DWM's comments (Doc ID 11691) dated October 1, 2010. I conducted a review on the new submittal. Based on the technical review, additional comments on the new submittal are stated below, and your responses to the following comments will expedite the review of the Application:

Section 1 – Operation Plan

1. The DMW has significant concerns regarding the response to Comment No. 3. The March 2 2011 response to Comment 3 indicates that Lenoir County C&DLF will not handle recyclables except white goods; however, the Division Facility Compliance Audit Reports dated June 17, 2010 and January 12, 2011, respectively addressed the concerns of the wooden pallet stockpiled at the landfill facility which will be used for boiler fuel purpose. Please provide the following information of the wooden pallet storage area in the Operations Plan:
 - i. Show the designated area for temporary stockpiling the wooden pallets on the Facility Plan drawings (F 1 and CD 1)
 - ii. Describe the physical features of the storage area (e.g. on the ground or pad, sizes of the storage area – dimensions and total acreage, etc), the maximum quantity (cubic yards) of the recyclable can be stored on-site at any time, the maximum size of each stockpile (base area and height), the fire prevention approaches (such as the minimum

- width of isles – 25 feet between the stockpiles and other physical structures for fire fighting and routine inspection)
- iii. Provide the information (name, address, contact person, phone number, etc.) of the contractor (s) who will receive the recyclable. The information must be retained and updated in the operating record.
2. The March 2 2011 response to Comment No. 3 indicates that Lenoir County C&DLF will handle white goods on the transfer pad as shown on the Facility Plan drawings; however the detail information requested in October 1 2010 Comment No. 3 is not addressed in the written response. Therefore, the DMW has to reiterate the comment below, and please properly address these concerns in the Operations Plan:
- i. Describe the physical features of the transfer pad (e.g. on the ground or concrete pad, sizes of the storage area – dimensions and total acreage, etc), the maximum quantity (cubic yards) of the recyclable can be stored on-site at any time.
 - ii. Please add the following requirement to the Operating Plan: *“White goods collection area shall provide for the proper removal of chlorofluorocarbon refrigerants by well-trained personnel.”*
 - iii. If scrap metal will be placed on the same transfer pad, then please stress that the white goods must be separately stored from other scrap metals if chlorofluorocarbon refrigerants are not removed from the whit goods.
 - iv. Provide the information (name, address, contact person, phone number, etc.) of the contractor (s) who will receive the recyclable. The information of the companies that have contacted to Lenoir County to haul and distribute/recycle must be placed in the operating record.
3. There is a LCID disposal area on the east side and immediately adjacent to the C&DLF as shown on the Facility Plan Drawing No. F1/Sheet 3 of 7. This LCID Area that encompasses area more than 2 acres as shown on the drawing, but there is no description of this waste unit at all. Please provide the information of this waste unit including, but not limit to,
- i. The size (acreage) of the facility, siting requirements, the total gross capacity and daily and annual waste disposal rates, the service area, and the incremental fill sequences and phased development in the Facility Plan and Facility Plan drawings (both planar layouts and profiles of the LCID unit) [Rules .0564 & .0565]
 - ii. The acceptable waste streams, cover requirements, and other operation requirements stated in the Operations Plan [Rule .0566].

Appendix A –Facility Drawings, Engineering/Operation Drawings, and Closure Drawings

4. (Figure F1/Sheet 3 of 7) The tabulated data of “Footprint Acreage” and “Gross Capacity (cubic yard)” associated with “C&D Unit On top of Closed MSW Unit (remaining of 6/9/2009) is incorrect. Consistent with the permit application document, the footprint acreage for C&D unit that is located and will be developed on a portion the top of the 47-acre closed MSW unit shall be 18 acres, not 46.76 acres. Please make necessary correction.
5. (Figure F1/Sheet 3 of 7 through Figure F5/Sheet 7 of 7)
 - i. Revise the tabulated gross capacity in response to the Comment No. 6 in this letter.

- ii. On Figure F1/Sheet 3 of 7 the remaining capacity C&D unit (as of June 9, 2009) is incorrect. Please revise the capacity according to the response to Comment No. 6 in this letter.

Appendix E – Facility Plan

6. (General, Last Paragraph on page 44) The Rule .0537(e)(2)(B) defines the “gross capacity of the C&DLF” as the volume of the landfill calculated from the elevation of the initial waste placement (for this case, the initial waste placement location will be the top of the final cover of the closed MSW unit) through the top of the final cover, including any periodic cover. Because the 1997 DWM-approved total gross capacity for C&D unit is **1,039,420** cubic yards. Using this approved gross capacity subtracts:
 - The remaining capacity of 529,853 cubic yards (cy) - from proposed Phase 3 through Phase 6,
 - The in-place waste volume of 371,428 cy in Phases 1 & 2 - from January 1, 1998 to June 9, 2009 as shown in the table on Figure F1/Sheet 3 of 7, and
 - The soil volume of 87,120 cy for the final cover over 18-acre C&D unit.

There are remaining capacity of 51,028 cy for Phases 1 & 2 and about 2 year of life for landfilling. If County agrees the above-mentioned facility phased planning to avoid loss of the waste capacity of 51,028 cy, please conduct the following actions:

- i. Revise the “Life Expectancy Calculations” for each 5-year phase in the Facility Plan. The number of phases may increase to 7. The total life of service of the C&D unit will be more than the proposed 21.49 years.
- ii. Correct the total permit C&D capacity to 1,039,420 (1997 submittal) cubic yards, not 3,569,825 cy.
- iii. Correct, as needed, the tabulated data of gross capacity on facility plan figures F1 through F5 and the final grade contours in the end of each proposed phase.

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 myself 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

Ed Mussler, Permitting Branch Supervisor
Christine Ritter, DWM

Mr. Tom Miller
March 18, 2010
Page 4 of 4
Doc ID: 13300

Dennis Shackelford, DWM
Central File

Wes Hare, DWM