



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

August 30, 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) 15045

Dear Mr. Miller:

On August 23, 2011, the Division of Waste Management (DWM), Solid Waste Section received the response letter dated August 19, 2011 and the revised portions of the Application (Doc ID 14910) which is submitted on your behalf by Municipal Engineering Services Co., Inc. (MESCO) to respond the DWM March 18 2011 comments (Doc ID 13300). I conducted a review on the new submittal. Based on the 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. (Section 1.1 Introduction, on Page 6) Please address the following concerns of wooden pallet and chipping/mulching stockpile:
  - i. Item g. proposes that “unpainted wooden pallets shall be disposed in the existing LCID landfill, as they are received.” Is this “LCID” landfill likely a typo of “C&DLF?” If so please make a necessary correction; otherwise, please provide the reference of the Solid Waste Management Rule (Rule) which allows the LCID landfill disposes off wooden pallet.
  - ii. Since the wood pallets will be temporary stored on-site prior to being ground and hauling off-site after grinding, the plan needs to describe the physical features of the storage area (e.g. on the ground or pad, sizes of the storage area – dimensions), 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) and the maximum duration of waste stockpiles (such as no more than a year) – after this duration the pallet must be disposed at C&DLF.
  - iii. Should any reason the ground material (chip or mulch) out of the wooden pallet can’t be hauled off site, the provisions of handling the ground material such as covering the ground material with plastic cover and controlling temperature in the stockpiles (including inspection and record keeping) must be addressed in the Operations Plan.

2. (Section 1.5, on Page 16 ) Please address the following concerns:
  - i. Please describe the minimum thickness of the periodic cover (such as 12 inches) in item (4) of this section.
  - ii. Please add the requirements stated in the Rule 15A NCAC 13B .0564(8) (a) through (c) to the Section 1.5.
  - iii. Pursuant to Rule 15A NCAC 13B. 0565(3)(j), please add the requirement of fill side slopes shall not exceed three (horizontal) to one (vertical) to this section.
  - iv. Pursuant to Rule 15A NCAC 13B. 0565(4), please add the requested information to this section. Annual disposal rate (TPY)/ daily rate (TPD) and service area must be consistent with the amount proposed in the Facility Plan.

Appendix E – Facility Plan

3. (LCID Landfill Capacity, on Page 46) Please address the following concerns:
  - i. The number of phased development is inconsistent in this section. Five (5) and ten (10) phases are mentioned in the text and four (4) phases are shown on the figures (F1/ Sheet 3 of 7 and CD1/Sheet 3 of 8). Please provide the correct phase numbers.
  - ii. According to NCGS 130A-294(b1)(2)(f), the facility plan for the LCID landfill (one type of sanitary landfills) must be incrementally developed in 5-year operational phases. Since the proposing Phases 2 through 5 are developed in the phases more than 5 years, please revise the facility plan and drawings accordingly.
  - iii. Provide the acreages of each phase.
  - iv. Pursuant to Rules 15A NCAC 13B .0564(8)(d) and .0565(1)(c), please provide information to demonstrate that LCID wastes is and will be placed on the cell bottom of the LCID landfill a minimum of four (4) feet above the seasonal high water table. Please incorporate the required info to the cross-section figures stated in item (v) of this Comment No. 3.
  - v. Pursuant to Rule 15A NCAC 13B. 0565(3)(o), please provide requested cross-section drawings.

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  
Dennis Shackelford, DWM  
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