



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

December 19, 2008

Ms. Nancy Rickard, Solid Waste Manager
Lincoln County
5291 Crouse Road
Crouse, North Carolina 28033

Subject: Permit Modification Application
Technical Review Letter
Lincoln County C&D Landfill
Permit No. 55-03
Lincoln County
Document ID No. 6242

Dear Ms. Rickard:

Lincoln County, the owner and operator of the Lincoln County C&D Landfill Facility, Permit No. 55-03 located in Lincoln County, has submitted to the Division, in accordance with the facility's requirement to comply with North Carolina Administrative Code 15 NCAC 13B .0547, the following information;

- *Closure and Post-Closure Plan, Lincoln County C&D Landfill – Phase II, Lincoln County, North Carolina, S&ME Project No. 1356-08-109.* Prepared for Lincoln. Prepared by S&ME. June 2008. Document ID No. 5080.
- *Revised Operations Plan, Lincoln County Landfill – Phase III, S&ME Project No. 1356-08-125.* Prepared for Lincoln County. Prepared by S&ME. December 2008. Document ID No. 6238.

The Division has completed the technical review of the application for the modification of the Facility's permit to operate; it has been determine that additional information is required for completing the technical review. Please provide the information requested below;

Closure

1. Revise the application to include the required Construction Quality Assurance (CQA) Plan, in accordance with 15A NCAC 13B .0543(b)(1) and 15A NCAC 13B .0541.

Post Closure

2. Revise the application to include the required information regarding the operation and maintenance of the gas monitoring system in accordance with 15A NCAC 13B .0543(e)(1)(C).

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Financial Assurance

3. Contact Mr. Donald Herndon, Environmental Compliance Officer, at (919) 508-8503 for information on Allowable Financial Assurance Mechanisms, in accordance with 15A NCAC 13B .1628.

Operations Plan

4. Section 1.3 *Leachate Collection and Removal System*; revise this section to include Section 4.7 *Leachate Management System for MSW Landfill*. Also, the Plan gives information on what will occur if the leachate collection system (LCS) were to clog. Due to issues with LCS's across the State, the Section is recommending, minimally, that all Owner/Operators revise their plans to include cleaning of the LCS annually and inspection with closed circuit television (CCTV). The Section requests you revise the Plan to include this minimum recommendation for maintenance and inspection.
5. Section 1.4 *Placement of Waste and Cover Material*, refers to stakes used to indicate the limits of waste placement. Revise the Plan to clarify whether these stakes are in addition to the required edge of liner markers, 15A NCAC 13B .1626(1)(g)(ii). Also, this Section seems to suggest that "a geotextile fabric" have been approved by the Section as an alternative daily cover (ADC). The Sections records indicate that no ADC's have been approved for the Unit, therefore, revise the Section by removing the reference to the "geotextile fabric".
6. Section 1.5 *Waste Acceptance, Disposal and Screening Requirement*, states that "random inspections will be performed at an area specifically set aside for conducting screening inspections (preferably on a level solid ground, pavement or concrete pad) away from the working face and any on-going landfill operations". Revise the Plan to indicate how leachate will be controlled during this operation at these sites.
7. Revise Section 1.7- *Operations Record Keeping* to include scrape tire hauler certification forms.
8. Section 2 *C&D Landfill Operations Maintenance*, revise the Plan to include detail on how often waste will be covered and that the working face will be kept under ½ acre in size. Revise the Plan to include a statement that all waste will be covered with 6-inches of earthen material when the waste disposal area exceeds ½ acre in size, at least once weekly and the requirement to make notation of date and time of the cover placement be recorded in the operating record.
9. Revise Section 3 *Yard Waste and Mulching Operations*, to includes a statement that the compost unit will be operated in accordance with the applicable portions of NCAC 15A 13B .1400 as detailed on the Acknowledgement Letter issued by the Division and a statement that a field log will be maintained showing all temperature readings to ensure that proper temperatures are maintained.
10. Section 4.6.6 *C&D Methane Gas Monitoring Program*, 15A NCAC 13B .0544 will require that the facility monitor quarterly, in the near future, it is recommended you revise your frequency to reflect this change.

Note: I observed that your C&D Operations Plan is minimal, please be aware that your facility will be required to submit a Plan in accordance with 15A NCAC 13B .0542 for your next Permit Amendment – Five (5) Year Permit Renewal.

Finally should you have any questions regarding this matter you may contact me at (828) 296-4704.

Sincerely,



Larry Frost
Regional Engineer

cc: Julie Petersen – S&ME
Ken Daly – S&ME
Deb Aja – SWS/ARO
CT Gerstell – SWS/MRO