



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 16, 2008

Mr. Jim Huff
Madison County – Solid Waste Director
271 Craig Rudisill Road
Marshall, North Carolina 28753

Subject: Technical Review Letter
Application for Continued Operation, CDLF Unit 2
Madison County, Permit #58-03, Document ID No. 6315

Mr. Huff:

The Division of Waste Management, Solid Waste Section (Section) has completed the technical review of the document titled *Application for Continued Operation, Construction & Demolition Landfill Unit 2, Madison County Landfill, Madison County, North Carolina, Permit #58-03*. This application was submitted on your behalf by McGill Associates and was received by the Section on June 30, 2008. It has been determined that additional information is required for completing the technical review. Please provide the information requested below:

Closure Plan

1. Section 1.1, Cap Construction, states *the cross section will consist of an 18 inch low permeable layer*, but does not state the minimum permeability. Please state the minimum permeability in accordance with 15A NCAC 13B.0543(c)(1).
2. Rule 15A NCAC 13B.0543(c)(2)(A) requires the post-settlement surface slopes must be a minimum of five percent and a maximum of 25 percent. Please provide the these numbers or provide documentation demonstrating the proposed maximum slopes meet the criteria outlined in 15A NCAC 13B.0543(c)(3)(C).
3. Rule 15A NCAC 13B.0543(c)(2)(B) requires a gas venting or collection system must be installed below the low-permeability barrier to minimize pressures exerted on the barrier. Please revise the plan to include this information.
4. Please submit a complete Construction Quality Assurance Plan in accordance with the requirements of 15A NCAC 13B.0541.
5. Rule 15A NCAC 13B.0543(c)(4) requires an owner or operator to notify the Division that a notice of the intent to close the unit has been placed in the operating record prior to beginning closure of each C&DLF unit. Please revise the plan to include this information.

Post-closure Plan

1. Please re-submit the Design Hydrologic Report and Environmental Monitoring Plan referenced in Section 5.4, Water Quality Monitoring Plan, to satisfy the requirements of 15A NCAC 13B.0543(e)(1)(B).
2. Rule 15A NCAC 13B.0543(e)(1)(C) requires a description of the activities to maintain and operate the gas monitoring system. Please revise the plan to include this information.

The Section has determined Closure and Post-closure Cost Estimates have been prepared in accordance with 15A NCAC 13B.0546(c)(1) and (c)(3), respectively, and are acceptable. However, to fully comply with the Financial Responsibility requirement you must contact Mr. Donald Herndon in the Field Operations Branch, (919) 508-8502, for approval of the mechanism for demonstrating Financial Assurance.

As a reminder, the current Permit to Operate for this facility will expire on October 18, 2011. No later than April 18, 2011 the County must submit a Permit to Operate amendment application prepared in accordance with 15A NCAC 13B.0535. If the existing facility will reach capacity prior to this date the County must submit a Permit to Construct application in accordance with 15A NCAC 13B.0547(3). This application should be submitted at least 120 days prior to the expiration date of the effective Permit to Operate or at least 180 days prior to the date scheduled for constructing a new phase not approved in the effective Permit to Operate.

If you should have any questions regarding this matter please contact me at (828) 296-4703, or by email at allen.gaither@ncmail.net.

Sincerely,



Allen Gaither
Environmental Engineer

Cc: Jeff Bishop – McGill Associates
Ed Mussler – SWS/CO
Andrea Keller – SWS/ARO