



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

February 24, 2012

Mr. Tim Rogers
Solid Waste Director
460 B South Landfill Road
Dudley, NC 28333

Re: Additional Comments on Permit Application for Continued Operation (Application)
Wayne County Construction and Demolition Debris Landfill (C&DLF)
Wayne County, North Carolina
Permit No. 96-01, Document ID No. (Doc ID) 16157

Dear Mr. Rogers:

On February 15, 2012, the Division of Waste Management (DWM), Solid Waste Section received the letter dated February 14, 2012 and the revised Application (Doc ID 16116), submitted by Municipal Engineering Services Co., Inc. (MESCO), on behalf of Wayne County, to respond the DWM's comments (Doc ID 15795) dated January 06, 2012. The Solid Waste Section conducted a review on the revised Application and has additional comments on the new submittal. Your responses to the following comments will expedite the review of the Application:

Section 1 – Operation Plan

1. (Section 1.3, on Page 11) Please change the number of wells from nine (9) to eleven (11).

Appendix A - Figures

2. The drawings F1/Sheet 3 of 9 and CD1/Sheet 3 of 9 are not included in the submittal dated February 14, 2012. Please confirm if there is any change on these two drawings.
3. The Facility Plan, Engineering/Operation Plan & Closure Plan drawings may be subjected to changes due to revision of phased development (Referring the Comment No. 4i & ii). Please make all necessary corrections accordingly.

Appendix E – Written Facility Plan

4. The Solid Waste Section has no comment on the proposed total gross capacity of 2,736,883 cubic yards for the C&DLF but can't accept the proposed landfill life expectancy calculation because the each proposed landfill phase has the active life more than a five-year period.
 - i. Please revise the incremental phased development of the C&DLF so that each phase provides no more than approximately five (5) years of operating capacity [Rule 15A NCAC 13B .0537(c)(1)].
 - ii. In response of Comment No. 4i, the revision of incremental phased development may result in the changes of gross capacity of that phase; therefore, should this occur please make corrections on the Facility Plan, Engineering/Operation Plan and Closure Plan drawings accordingly.

Appendix F – LCID Written Operation Plan

5. (Introduction) To avoid any confusion and consistent with the information provided in the context & drawing throughout this Plan, please confirm that the proposed LCIDLF will have waste footprints no greater than two (2) acres.
6. (General) Please address the following concerns:
 - i. Is this LCIDLF an existing landfill or a proposed one? Please clarify.
 - ii. According to the map Sheet 1 of 1 in the “Evaluation Report,” the LCIDLF is located on the “northeast” side of the C&DLF which is seated on top of the closed MSWLF, not northwest. Please correct this typo.
 - iii. Please add the vegetation and erosion control requirements for the closure of LCIDLF [Rule 15A NCAC 13B .0505(6)].
7. Please provide scaled drawings with contours/elevations (amsl) – one layout /plan view and two cross-sections along each major axis per operational area to show the incremental phased development of the LCIDLF, such as the current ground elevations, the proposed excavations, the proposed elevations at the end of the 5-year phase of operation, and/or the proposed final elevations and slopes of the closure.
8. (Evaluation Report for LCIDLF) Please provide narrative descriptions of the soil classifications/types in each test pit.
9. According to the written response to DWM Comment No. 15 dated January 06, 2012, the County has relocated the proposed LCID to a new area, but there is no drawing to show the new LCIDLF location (such as Facility Plan drawings). Please provide the updated drawings.

Please submit the requested documents and timely respond the above-referenced comments which shall be incorporated into the revised Application. One hard copy and an electronic copy for each submittal are required. The Solid Waste Section appreciates your patience, efforts, and cooperation in these matters. If you have any permitting questions, please contact myself at (919) 707-8251.

Sincerely,



Ming-Tai Chao, P.E.
Environmental Engineer
Permitting Branch, Solid Waste Section

cc:

Wayne Sullivan, MESCO
Dennis Shackelford, DWM
Central File

Ed Mussler, Permitting Branch Supervisor
Wes Hare, DWM