



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

October 2, 2009

Mr. Steve Clayton, Director
Wilson County Solid Waste Department
P.O. Box 1728
Wilson, North Carolina 27894-1728

Re: Comments on Permit Application of Wilson County Westside Construction and Demolition Debris Landfill (C&DLF), Cells 1 through 3 Continued Operations (the Permit Application)
Wilson County, North Carolina
Permit No. 98-09, Document ID No. 8713

Dear Mr. Clayton:

This letter constitutes a review of the Permit Application for the above- referenced facility. The Permit Application is titled:

Wilson County Westside C&D Landfill (Permit 98-09) Continued Operations. Prepared by: BlackRock Engineers, Inc., Wilmington, NC and Richardson Smith Gardner & Associates (RSG), Raleigh, NC.
Prepared for: Wilson County. July, 2008. DIN 5152.

The Solid Waste Section of the Division of Waste Management (DWM) conducted a review of compliance with the Solid Waste Management Rule (Rules), 15A NCAC 13B .0547(2) and requests you to provide the following additional information:

Attachment A

1. Please submit a complete Construction Quality Assurance Plan (CQA) in accordance with the requirements of 15 A NCAC 13B .0541.
2. (Soil Liner CQA, Paragraph 5.0 on page 2) The Paragraph 5.G is inconsistent with the proposed final soil cover system. Please clarify.
3. (Soil Liner CQA, Table 3, & Table 3.1 in Attachment B) The proposed CQA testing frequency for hydraulic conductivity (ASTM D 5084) of soil liner is 80,000 square feet per lift. This proposed testing frequency is less than the waste industry standard of 1 test per lift per acre. Please clarify, and the costs for conducting CQA in Table 3.1 may need to be revised.

Attachment B – Closure Plan

4. (Section 1.3 and Figure 2) The Paragraph D.4 of Section 02250 in Attachment A specifies that a subgrade will be properly constructed prior to placement of the soil liner. Please describe this subgrade (or intermediate cover) in Section 1.3 and show the subgrade in Detail 1 of Figure 2.

5. (Section 1.4, Figure 1, & Table 3.1) On Figure 1 there are five (5) landfill gas wells/vents to be installed over the 10.5-acre closed area. Comparing to the waste industry standard of one (1) gas vent per acre of the final cover, the number of the proposed gas vents is not sufficient. Please clarify and add the final number of the proposing gas well/vent to Section 1.4 and Figure 1. The costs of installing the gas system in Table 3.1 may need to be revised as well.
6. (Section 1.6) Please add the closure notification requirements in accordance with Rule 15 A NCAC 13B .0543(c)(4) to the proposed Closure Plan.
7. (Section 1.7) Please describe (i) where to record a notation on the deed and (ii) the requirement of informing the DWM upon completion of placing notation on of deed of landfill facility property.
8. (Table 3.1) Is there a "shrinkage factor" used to calculate the quantity of soil cap system components? What is the assumption of the soil sources - from the on-site or off-site borrow sources? Please clarify.

Attachment B – Post-Closure Plan

9. (Section 2.3) Please add maintenance requirements for the access road to all monitoring points. The costs for road maintenance need to include in the cost estimate Table 3.2.
10. (Section 2.4.2) Please describe the requirements for mowing, re-vegetation, and fertilization (See cost items in Table 3.2) to encourage the growth and establish healthy vegetation on the final cover during the post-closure period.
11. (Section 2.4.4) Please describe the maintenance requirements for the on-site sedimentation pond/basin.

Please incorporate the requested information and associated documents, revisions, and responses to a new hard copy and an electronic copy of the revised permit application. The Solid Waste Section appreciates your efforts and cooperation in this matter. If you have any questions, please contact me at (919) 508-8507.

Sincerely,



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

cc:

Pieter K. Scheer, P.E., RSG
Ed Mussler, Permitting Branch Supervisor
Dennis Shackelford, DWM
Central Files

Gary Ahlberg, P.E. Blackrock Engineers
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