



North Carolina Department of Environment and Natural Resources
Division of Waste Management

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Governor

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Solid Waste Section

February 05, 2010

Mr. Andy Davis
Solid Waste Director
P.O. Box 1728
Wilson, North Carolina 27894

Re: Comments on Permit Amendment Application
Wilson County Westside Construction And Demolition Debris Landfill (C&DLF)
Wilson County, North Carolina
Permit No. 98-09, Document ID No. (Doc ID) 9537

Dear Mr. Davis:

On January 28, 2010, the Division of Waste Management (DWM), Solid Waste Section (SWS) received the permit application document, which is titled as:

- *Permit Amendment Application (Application, Wilson County Westside C&D Landfill Facility, (Permit 98-09). Prepared by Blackrock Engineering, Inc., in Wilmington, North Carolina and Richardson Smith Gardner & Associates (RSG) in Raleigh, North Carolina, dated January 2010 (Doc ID 9498).*

The SWS has conducted a review of compliance with the Solid Waste Management Rule (Rule), 15A NCAC 13B .0500 et seq. The SWS hydrogeologist will review the *Water Quality Monitoring Plan* and may request any additional information related to water quality monitoring and hydro-geology in a separate letter upon completion of his or her review. This letter is a review of the engineering related portions of the Application, and the SWS has comments on the application. Your responses to the following comments will expedite the review of the permit application.

Attachment A - Facility and Engineering Plan

- I. (Sections 1.0 & 2.1) Please provide an updated Facility Plan drawing to include:
 - i. The components required by Rules .0537(d) and .542(b).
 - ii. All waste management units (including the LCID area, the new scale house and the Convenience Center) as described in the Section 2.1. [Rule .524(b)(1)(G)]
 - iii. The in-place waste fill contours in Phase 1 based on the recent survey results or the ones dated August 26, 2008.

2. (Section 4.4.2) Is this Yard Waste Processing Area the same waste management unit called Compost Area/ Yard Waste shown on Drawing No. SC1 in the Site Application dated December 2003? Please clarify.
3. (Section 6.2) The descriptions of the final soil cover system are inconsistent with the submitted Closure Plan and Figure 2 in Attachment G. Please clarify.
4. (Sheet 3/7 in Appendix A and Section 2.3) The disposal rate of 20,000 ton per year (tpy) was determined in the 4 November 2002 Resolution approved by the Wilson County Board of Commissioners. Therefore, the calculation of the remaining service life for the C&DLF will be 8.3 years, based on the approved disposal rate of 20,000 tpy, not 25,700 tpy. Please clarify.
5. Note that response to Comment No. 4 may necessitate changes to phase delineation (both texts and drawings) because the each delineated phase shall not exceed approximately five years of operating capacity [Rules .0537(c) & (d) and .542(a)].
6. The Phase 1 has the approved disposal capacity of 100,000 tons, and as of August 26, 2008, the actual quantity of the in-place wastes in Phase 1 is 111,418 tons as shown in Appendix A. Therefore, the reviewer assumes that the Phase 1 area is completed filled, and this permit application is also served as a Permit to Construct Application for Phase 2 (Vertical Expansion). If the assumption is correct, the Facility Plan may need to explicitly describe this intention. Please clarify.

Attachment D - Operations Plan

7. Although the SWS approved the original Operations Plan in 2004, the submitted Operations Plan, as a portion of the Application, must be prepared in accordance with applicable statutes and rules in effect on January 1, 2007. Therefore, the Operations Plan must address the following concerns:
 - i. Management for asbestos wastes disposal [Rule .0542(c)(2)].
 - ii. Identification of wastes prohibited for disposal [Rule .0542(d) & (e)].
 - iii. Cover (periodical and intermediate covers) requirements [Rules .0542(f)(1) & (2)].
 - iv. Provisions for spreading and compacting wastes [Rule .0542(g)].
 - v. Measures for disease vector and litter control [Rule .0542(h)].
 - vi. Requirements for erosion and sediment controls [Rule .0542(k)].
 - vii. Requirements for drainage controls and protection surface water quality from waste disposal activities [Rule .0542(l)].
 - viii. Requirements for Operating Recordkeeping [Rules .0542(n)].
 - ix. Explosive gas control and monitoring plan for on-site structures or confined spaces [Rule .0544(d)].
8. In the Application, in addition to the C&DLF, there are several on-site miscellaneous waste management units: Used Tire Storage Area, White Goods/Scrap Metals Storage Area, the Convenience Center, and Yard Waste Processing (Composting) Area, LCID area. The Operations Plan must describe how the waste units are properly managed in compliance with Solid Waste Management Rules.

- i. Management and operation of the Used Tire Storage Area must be in compliance with Rule .1107.
 - ii. Management and operation of the Yard Waste Processing/ Composting Area must be in compliance with Rules .1400 et seq.
 - iii. Management and operation of LCID area must be in compliance with Rules .0563, .0565, and/or .0566.
9. Additionally, the Operations Plan needs to address the following concerns, but not limited to, for the waste units - White Goods/Scrap Metals Storage Area and the Convenience Center:
- i. Description of the physical dimensions and/or structures of the stockpiles or storage areas, which are shown on the facility, plan drawings (see Comment No. 1).
 - ii. Provisions for fire preventions and routine inspection (including spaces between isles, windrows, or stockpiles).
 - iii. Provisions for waste segregations, disposal approaches, and labeling & marking requirements (for Convenience Center only).
 - iv. Provisions for prevention from surface water to contact wastes.
 - v. Provisions of removal of Freon from white goods.
 - vi. Descriptions of the maximum tonnage of recyclable material will be allowed to store at any time at the facility and of the estimated tonnage per month or per year.
 - vii. The frequency or schedule for off-site removal of the recyclable material.
 - viii. The contact information of a contractor or recycler to handle and/or off-site transportation for the recyclable material.
10. (Section 4.1) The last sentence indicated that “the peak intermediate fill elevation will be 122 msl under the initial 5-year operation phase.” Is this statement matching the 2008 survey results (Appendix A of the Facility & Engineering Plan)? Please clarify.
11. (Section 4.1) Because the remaining service life of the C&DLF may last for 8 more years (see Comment No. 4), up to two 5-year phases, this section needs to describe the incremental phase development of the facility [Rule .0542(a)]. Please revise this section accordingly.
12. (Section 4.4.1) Wooden pallets are banned from disposal as defined in the NCGS Article 9, Chapter 130A-290(44a), effective October 1, 2009. Only pallets generated in C&D activities may be disposed of in a C&DLF, not pallets generated in industrial or commercial activities. All pallets are recyclable; therefore, wooden pallets that are ground for mulch or boiler fuel or other such uses may be added to the waste streams in Yard Waste Processing/Composting Area. Please incorporate the above-mentioned requests to the revised Operations Plan.
13. (Section 4.4.2) Please provide the frequency for the random waste screening.

Attachment E – Closure and Post-closure Plan

14. (Section 1.2) The information of landfill unit and the gross capacity provided in the table of the section is inconsistent with those stated in the Facility and Engineering Plan. Please clarify.

Attachment G – Permit Amendment Drawings

15. (Drawing No. D1) Does the "Phase 1 Intermediated Grade" shown in the cross-sections correlate to the in-place waste capacity/ volumes presented in Appendix A of the Facility and Engineering Plan? Please clarify.

Attachment H – Water Quality Monitoring Plan

16. The submitted Water Quality Monitoring Plan must include the surface water quality monitoring program in accordance with Rules .0544(c) and .0602.

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 SWS 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:

Pieter K Scheer, P.E., RSG
Gary W. Ahlberg, P.E., Blackrock Engineers, Inc.
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