



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

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Solid Waste Section

August 10, 2010

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

Re: Additional 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) 11305

The Division of Waste Management (DWM), Solid Waste Section has reviewed the revised portions of the Permit Amendment Application dated June 23, 2010 (Doc ID 10925), submitted by Blackrock Engineering, Inc., on behalf of Wilson County, in response to the DWM's comments (Doc ID 9537) dated February 5, 2010. But no official response letter to address the aforementioned DWM's comments is issued by Wilson County. On July 15, 2010, a site visit was conducted with you and representatives from the Solid Waste Section for the purpose of walking over the site and observing current operating conditions of the C&DLF and other miscellaneous waste units.

Based on observations during the site visit and review of the June 23, 2010 revised Permit Amendment Application, the Solid Waste Section has additional comments on the new (revised) submittal, and your responses to the following comments will expedite the on-going review of the Permit Amendment Application:

1. (Executive Summary, Table 1 in Facility & Engineering Plan, Section 1.1 of Operations Plan) Please address the following concerns pertaining to waste disposal rate:
  - i. The disposal rate of 20,000 ton per year (tpy) was determined in the 4 November 2002 Resolution and approved by the Wilson County Board of Commissioners. Therefore, the calculation of life expectancy for the C&DLF shall use the approved disposal rate of 20,000 tpy, not 22,000 tpy. Consequently, the estimated remaining service life, approximately 6.4 years, of the C&DLF is not correct. Please make the necessary corrections by using the correct disposal rate of 20,000 tpy throughout the entire permit application document and provide the revised service life of the landfill.
  - ii. The reported average disposal rate from October 4, 2004 to April 15, 2010 is 22,018 tpy, which is more than ten percent of the approved disposal rate of 20,000 tpy. This variance is considered as a substantial change in accordance with N.C.G.S. 130A-294(b1)(1). If Wilson County intends to adopt this average disposal rate of 22,000 tpy as the new disposal rate in the future waste management and planning, please submit a substantial permit amendment application in accordance with Solid Waste Management Rule (Rule) .0535(c).

2. (Executive Summary, the fourth paragraph) Wilson County proposes that “if the permit requirements remain unchanged from this submittal, the approved plan documents incorporated herein shall be sufficient to continue operations to pre-final cover grade for closure implementation.” This proposal may be acceptable if the site and operational conditions for the future phases are the same as those described in the approved plans for Phase 2 development. The future site and operational conditions include, but are not limited to, the facility plan, the operations plan (acceptable waste streams and other solid waste activities in addition to C&DLF), and environmental media monitoring conditions (water quality monitoring and landfill gas monitoring). Please incorporate the aforementioned requirements to this paragraph.

#### **Attachment A - Facility and Engineering Plan**

3. There is an approximately 5-acre mulch area, on the south side of the 2-acre Yard Waste Area as shown on Figure 3. Please address the following concerns:
  - i. Please describe this mulch area and operation activities at this area in the Facility Plan (Attachment A) and Solid Waste Management Facilities (Attachment I).
  - ii. During the July 15, 2010 site visit, Wilson County acknowledged that this “mulch area” would be an area for stockpiling mulch/composting products; therefore, the DWM considers this “mulch area” is a portion of the Yard Waste Area. Because the yard waste composting facility encompasses a total area of approximately 7 acres, the facility is not a Small Type 1 facility but a Large Type 1 facility as defined in the Rule .1402(f)(7). Wilson County must reclassify the yard waste composting facility and submit supplemental information to the permit application in accordance with Rule .1400 et seq. for operating this composting facility.
4. (Section 2.1) Please add Asbestos Trench Disposal Area to the list of “Facility Services” contained in this section and also note the status (active or inactive/closed unit) of this asbestos wastes disposal area.

#### **Attachment D - Operations Plan**

5. (Section 1.4.1, on Page 2) During the July 15, 2010 site visit, a Wilson County representative said that the County planned to close the existing Asbestos Trench Disposal Area as shown on Figure No. 3, which would be subject to approval granted by the Wilson County Board of Commissioners. The Asbestos Trench Disposal Area does not currently meet existing landfill buffer requirements and the asbestos disposal area was also cited in the March 11, 2010 DWM Facility Compliance Audit Report as being an “inactive waste disposal site” in accordance with 40 CFR 61.141. Therefore, the DWM strongly recommends that Wilson County permanently close the Asbestos Trench Disposal Area. Upon receiving approval of closing this unit from the Wilson County Board of Commissioners, Wilson County needs to conduct the tasks described below which can be appended to the revised Permit Amendment Application:
  - i. Submit to DWM the closure plan and post-closure care plan that must be prepared in accordance with the requirements stated in 40 CFR 61.151 and .154.
  - ii. In the closure plan, please briefly describe the history of this waste unit including the starting and final dates receiving wastes, areal and vertical limits (including width and depth of trench sizes below ground surface and the final grades), documented total of the in-place waste quantities (in cubic yard and/or tonnage), record-keeping, etc.
  - iii. In the post-closure care plan, please describe the completion of deed recordation of this closed unit, install a warning sign for no disturbance of the closed area, install waste edge markers, and schedule inspections and maintenances according to 40 CFR 61 subpart M.

6. According to the Operations Plan, Wilson County plans to dispose of asbestos waste inside the C&DLF on a project specific basis. Please address the waste acceptance and disposal requirements according to Rule .0542(c)(2) and 40 CFR 61.
7. (Section 1.4.1) 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. Because all pallets may be recycled or ground for mulch or boiler fuel, such uses may be added to the waste streams of the on-site yard waste compost unit. Please incorporate the above-mentioned rule requirements or suggestions for the management of wooden pallets in the revised Operations Plan.
8. (Section 1.4.3) Please address the following concerns related to waste screening:
  - i. This sub-section proposes that “the operator shall monitor loads periodically (at least monthly) to identify non-conforming waste....” Because the March 11, 2010 DWM Facility Compliance Audit Report indicates that the County needs to increase the screening frequency, the Solid Waste Section requests the County demonstrate that the proposed waste screening frequency is sufficient and adequate to serve the purpose of the waste screening program. The reviewer recommends that the waste screening frequency be based on the number of waste loads received, the general principal of statistical random sampling, and the frequency adopted in the waste industries. Please clarify.
  - ii. This sub-section proposes that “if a suspect load is identified, an inspection will be conducted in an area prepared near the working face.” This approach is inconsistent with that described in Section 2.5 of the Facility and Engineering Plan (Attachment A). Please clarify.
  - iii. Please provide the typical waste screening/inspection forms appended to the Operations Plan.
  - iv. (Personnel Training and Preparation) Please describe how often the facility personnel are receiving the described training.
  - v. (Identify Excluded Wastes) Please provide the paint filter liquid test (EPA SW-846 Method 9095) document appended to the Operations Plan, and describe who will be responsible for conducting this test.
  - vi. (Key Personnel) Please add the contact information of the local fire department and sheriff’s department.
  - vii. (Key Personnel) According to Wilson County’s web site, Gordon W. Deno is the contact of the Wilson County Emergency Management. Ben Barnes’ phone number is 919-621-3680 or 919-508-8400 for the DWM. Please make necessary corrections.
  - viii. (Procedures for Hauling Excluded Wastes) The tasks, which were described in the last paragraph on page 5 and the first paragraph on Page 6 must be conducted by a person or persons who have been properly trained in accordance with federal and state rules and regulations. “The operator” must be properly defined. Please clarify.
  - ix. (Procedures for Hauling Excluded Wastes) Please provide example copies of the inspection forms.
9. (Section 1.5) Please address the following concerns:
  - i. Provide the information related to cover thickness if the condition that is described in Rule .0542(f)(2) is encountered.

- ii. The minimum frequency for inspection of potential leachate breakout.
  - iii. Add the inspection area including the perimeter of the entire landfill, working faces of the daily cell, and the previously patched areas.
  - iv. The person who will be responsible for conducting the inspection.
10. (Sections 1.9 & 1.10) Please change MSWLF to CDLF throughout the sections.
11. (Section 1.10) Please address the following concerns:
- i. Please provide the mentioned contingency plans which were not provided in the permit application document.
  - ii. Regarding open burning requirements please add:
    - Notation of approval date and the name of the DWM personnel who approved the type of the open burning, and
    - The new requirement (in italic format) to the end of sentence in item (b) "*The Division of Air Quality and local fire department must approve the activity prior to burning.*"
  - iii. Please describe what kinds of equipment, tools, and/or resources are available on site on a daily basis (such as piles of dirt adjacent to the working face, fire extinguishers, etc.)
  - iv. Please describe the written notification for fire or explosion event [Rule .0542(i)(4)].

**Attachment E – Closure and Post-closure Plan**

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

**Attachment G – Permit Amendment Drawings**

13. The information of the Phase 1 fill grade provided on Figure 5 is inconsistent with that on Figure 4. Please clarify.

14. Please define the "Proposed Final Cover" on Figure 5.

**Attachment H – Monitoring Plan**

15. A technical review letter dated April 12, 2010 was sent to the facility by the SWS hydrogeologist with comments on the original 2004 Water Quality Monitoring Plan. The letter requested a number of additional items which were not provided in the revised Monitoring Plan dated June 2010. The April 12, 2010 letter requested the facility to develop and submit a landfill gas monitoring plan and a plan was not submitted, only a figure showing the location of one landfill gas probe. Please submit a detailed landfill gas monitoring plan in accordance with the SWS guidance on landfill gas monitoring plan which was provided to you in the April 12, 2010 technical review letter. The placement of the landfill gas monitoring points relative to the Piedmont Gas line north of the landfill is of particular importance as the pipeline can be considered a preferential pathway for the migration of gas. In the event that gas is detected in the vicinity of the pipeline, it would be necessary to determine whether gas was originating from the pipeline or from the landfill. Another important consideration for the development of an adequate landfill gas monitoring plan is the number and spacing of landfill gas monitoring points. Landfill gas monitoring points are to be located around the perimeter of the landfill with spacing between monitoring points of 500 feet or less. Another copy of the SWS Landfill Gas Monitoring guidance document is provided for your convenience.

16. The 2004 Water Quality Monitoring Plan included 16 inorganic constituents while the June 2010 Monitoring Plan included only 8 of those inorganic constituents. Please add the 8 inorganic constituents omitted in the June 2010 Monitoring Plan. Additionally, please add the constituent tetrahydrofuran (THF) to your parameter list. A memorandum was sent out on June 15, 2010 from the NC Solid Waste Section to every C&D landfill owner and operator in North Carolina requiring groundwater and surface water samples collected after January 1, 2011 to be analyzed for THF. A copy of the memorandum is attached.
17. After conducting a site visit to the facility on July 15, 2010, it is agreed that surface water monitoring is not feasible at this time.

**Attachment I – Solid Waste Management Facilities**

18. (Section 1.2) Please address the following concerns related to scrap/used tire collection area inside the Convenience Center.
  - i. Please provide the site-specific detail for the used/scrap tire operation and management plan according to Rule .1107.
  - ii. The March 11, 2010 DWM Facility Compliance Audit Report stated that the used tires are currently stockpiled on the ground surface. To be in compliance, Wilson County proposed to store the collected tires in trailers prior to off-site transportation. If so, please describe how many trailers will be staged at the landfill facility at any given day and the contractor's contact info, such as company name, phone number, address, a the tire hauler or recycler registration number.
19. (Section 1.2) Please provide the "permit facilities" information (MSWLF or MSW Transfer Facility Name, Permit Number) which will be receiving the household non-C&D wastes disposed at the Convenience Center by residents in Wilson County.
20. (Section 1.3) Please address the following concerns of operation and management of Yard Waste Facility – Large Type 1 facility according to Rules 1400 et seq. At a minimum the following concerns must be properly addressed in Section 1.3:
  - i. Describe the waste stream which can be accepted in this unit (such as yard trash as defined in NCGS 130A-290(a)(45), land-clearing debris as defined in NCGS 130A-290(a)(15), wooden pallet as defined in NCGS 130A-290(a)(44a), and clean unpainted and untreated wood etc.)
  - ii. What BMPs or physical structures will be established or constructed to divert surface water or runoff from the operational, compost curing, and storage areas [Rules .1404 (a)(9) & (c)(2)]?
  - iii. What provisions are there to contain and treat leachate that generated from the composting processes [Rule .1406(4)]?
  - iv. What are the provisions to ensure the requirements stated in Rule .1404(10) can be satisfied? This unit is not covered by any established groundwater monitoring networks (C&DLF and MSWLF).
  - v. Please describe what kind of fire fighting equipment and resources [water and/or piles of dirt] are available on site [Rule .1406(7)]?
  - vi. Please describe the operating practice to prevent fire or facilitate fire fighting (such as the internal and external reporting and notification procedures if a fire occurs and maintaining a minimum distance of 25 feet between the wastes stockpiles and 25 feet distance between stockpile and any other physical structures and the maximum sizes – high and base of each waste stockpile) [Rules .1406(7) & .1404(a)(8)].

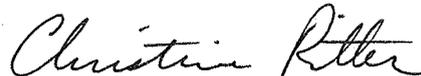
- vii. Has the fire fighting arrangement between the landfill and local fire department been established? If so, please provide the point contact information (name and phone number) of the local fire department, sheriff department and any other parties/agencies needs to report in this Section. The point contact information must be posted on site.
  - viii. Will there be any treatment and process activities (such sorting, screening, grinding, etc.) conducted at this area? If so, please provide the equipment and machinery to be used for the tasks.
21. (Section 1.5) Please address the following concerns of operation and management of the Inert Debris Area:
- i. Please provide the minimum thickness of the soil cover described in the item (4).
  - ii. The wastes may be ultimately disposed at the designated area according to item (4); therefore, the permanent marker shall be installed along the waste footprints. Please add this requirement to the Section 1.5.

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 Ming Chao at (919) 508-8507 or Christine Ritter at (919) 508-8506.

Sincerely,



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



Christine Ritter  
Hydrogeologist  
Permitting Branch, Solid Waste Section

cc:

Gary W. Ahlberg, P.E., Blackrock Engineers, Inc.  
Donna Wilson, DWM  
Ben Barnes, DWM

Ed Mussler, Permitting Branch Supervisor  
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