

Chao, Ming-tai

From: Chao, Ming-tai
Sent: Wednesday, December 22, 2010 2:41 PM
To: 'Gary Ahlberg'
Subject: Draft comment on the revised Permit application, Wilson County Westside C&DLF, Permit # 98-09
Attachments: DINxxx_3rdcommment_ltr__wilson_c&dLF.pdf

Gary: Please review the attached draft comment letter and call me if you have any questions about the comments. Christine may or may not have any comment on the application. We won't know the answer until she come back to work on next Tuesday or later.

I also wish you and your family have a Merry Christmas and Happy New Year.

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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

December XX, 2010

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

Re: Additional Comments on the revised 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) 12554

The Division of Waste Management (DWM), Solid Waste Section has reviewed the revised the Permit Amendment Application dated December 2010 (Doc ID 12432), an electronic document (2 CDs) submitted by Blackrock Engineering, Inc., on behalf of Wilson County, in response to the DWM's comments (Doc ID 11305) dated August 10, 2010.

Based on the review, 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:

Attachment D - Operations Plan

1. (Section 1.4.1) The December 14 2010 response to the DWM Comment No. 4 indicated that Wilson County plans to formally close the inactive Asbestos Trench Disposal Area originally approved under Solid Waste Management Permit No. 98-01. Any asbestos waste approved for receipt at the facility shall be landfilled in a discrete area of the C&D unit. The Section 1.4.1 describes the approaches to disposal of asbestos are inconsistent with the Response and the Section 1.13 – Asbestos Disposal requirements. Please clarify.
2. The December 14 2010 response to the DWM Comment No. 5 indicated that Wilson County intends to close the inactive Asbestos Trench Disposal Area located on the northeast side of the closed MSWLF (Permit No. 98-01). The Solid Waste Section hereby acknowledges receiving the closure notification of this Asbestos Trench Disposal Area from the County and suggests submitting a Closure Verification Report and Post-Closure Plan which shall be prepared in accordance with 40 CFR 61, Subpart M and the recommendations stated in the above-referenced Comment No. 5 dated August 10, 2010. Please also provide the schedule for submitting the plan (the Solid Waste Section suggests thirty days (30) after the County received this letter.)
3. (Section 1.13) Please provide a typical asbestos waste generator manifest to this sub-Section as described in Section 1.13.1.

Attachment G – Permit Amendment Drawings

4. The Figure 3 (previously submitted on June 23, 2010) and Drawing No. D1 (previously submitted on January 28, 2010) are out-of dated and replaced by Figure S1 and Figure 4, respectively. To avoid any confusion in the future, please either remove these two figures from the final copy of the permit application (The new figure number sequence must be updated in the text) or stamp or add “Superseded by Figure XXX” watermarks in the background on both figures.

Attachment H – Monitoring Plan

Christine: Do you have any comments on the LFG Monitoring Plan?

Attachment I – Solid Waste Management Facilities

5. (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.
6. Please provide a copy of the approval letter and a copy of the Erosion and Sediment Control Plan approved by NC LQS for the development and operation of the Solid Waste Management Facilities mentioned in Sections 1.2 & 1.4.
7. (Section 1.6) In the last paragraph, County requests to use a portion of the Inert Debris Unit to dispose of asbestos-containing waste. The County will operate of the asbestos-containing waste disposal unit according to the Section 1.13 of the Operations Plan and 40 CFR 61. For the Solid Waste Section to approve this request, County must:
 - i. Submit the updated drawings (layouts and profiles) to show the disposal limits which are contiguous with other disposal units and not interfere with the existing and future monitoring networks (water quality and landfill gas monitoring).
 - ii. Consider to increase the cover soil thickness and enhance the erosion control measures to avoid potential issue such as waste exposure to the surrounding environments. Since the disposal unit will be a standing alone and aboveground unit.

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
Dennis Shackelford, DWM
Central File