



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

Pat McCrory
Governor

Dexter R. Matthews
Director

John E. Skvarla, III
Secretary

SOLID WASTE SECTION
March 27, 2013

Mr. James Kilgo, Solid Waste Director
Rutherford County Government
Post Office Box 1957
Rutherfordton, North Carolina 28139

Subject: Permit Amendment, Five Year Renewal, Determination of Completeness and Technical Review
Rutherford County MSW Landfill, Permit No. 8105-MSWLF-
Rutherford County, DIN 18754

Dear Mr. Kilgo:

Determination of Completeness

The Solid Waste Section (Section) received Rutherford County's (County) five (5) year permit renewal application for the Rutherford County MSW Landfill, Permit No. 8105-MSWLF- on December 28, 2012 entitled:

Permit Renewal Application and Facility Plan Update for the Rutherford County Central MSW Facility and CDLF (Permit 81-03-2002). Prepared for Rutherford County. Prepared by Odom Engineering. December 2012. DIN 18166.

The Section has performed a review of the application for a determination of completeness and determined the application is complete in accordance North Carolina General Statute NCGS 130A-295.8(e). A determination of completeness means the application contains the required application components, in accordance with North Carolina Administrative Code 15A NCAC 13B .0500.

Technical Review

The following items must be addressed before the renewed permit to operate can be issued.

Financial Assurance

1. The County should supply updated closure and post-closure care cost estimates for the Facility to me for approval. These estimates should include; closure cost estimates for the C&D Landfill, thirty (30) year post-closure care cost estimate for the C&D Landfill and what remains of the thirty (30) year post-closure care cost estimates for the closed MSW Landfill.
2. The County should contact and supply Ms. Jackie Drummond, Compliance Hydrogeologist at (919) 707- 8294 (jaclynne.drummond@ncdenr.gov) with the required updates to the Facility's current corrective action plan costs estimates.
3. The County should contact and supply Ms. Elizabeth Werner, Permitting Hydrogeologist (919) 707- 8253 (elizabeth.werner@ncdenr.gov) with the required updates to the Facility's Potential Assessment and Corrective Action (PACA) costs estimates.

Monitoring Plan

4. The County should contact Ms. Elizabeth Werner, Permitting Hydrogeologist (919) 707-8253 (elizabeth.werner@ncdenr.gov) regarding updates to the Facility's Landfill Gas and Water Quality Monitoring Plans.

Operations Plan

5. Section 5.1.3 Hours of Operation. The hours in the submitted plan are not the same as those on the County's website, the website and plan should be made consistent.
6. Section 5.5 Waste Handling Procedures. Expand on the personnel training and procedures the County has in place for waste screening.
7. Section 5.5.1 Waste Receiving and Inspection. Expand on the methods, equipment and personnel training required to perform visual inspections of waste at the scale house.
8. 5.5.3.2 General Procedures. Define who the "working face superintendent" is and what are his/her training requirements and responsibilities.
9. 5.5.3.3 Special Wastes: Asbestos Management.
 - a. Include a copy of a "proper NC DMV transport manifest" as an example in the Plan.
 - b. The Plan states, "The landfill staff will, with record the approximate location..." clarify/correct this statement.
10. 5.6.1 Periodic Cover. The Plan states "CDLF shall be covered on a weekly basis", correct this language to state, **CDLF shall be covered at least once every seven (7) calendar days.**
11. 5.6.2 Final Cover.
 - a. Where the Plan refers to "interim soil cover", revise the language to reflect the requirements of 15A NCAC 13B .0542(f)(2).
 - b. The Plan refers to "settlement" and "extreme settlement", and the cover requirements, define in the Plan when settlement becomes extreme settlement.
12. 5.12 Sedimentation and Erosion Control.
 - a. Revise the Plan to say that, **woody mulch may only be used but only as a temporary groundcover measure.**
 - b. The Plan states, "exposed soils,....., should be covered as soon as possible", explain in the Plan what "exposed soils" should be covered with.

Note: The Operations Plan once revised should be submitted to me for approval.

Finally, if you should have any questions regarding this matter you may contact me at (828) 296-4704 or larry.frost@ncdenr.gov.

Sincerely,

Larry Frost
Environmental Engineer

cc: David Odom – Odom Engineering
ec: Bill Wagner – SWS/ARO
Elizabeth Werner – SWS/CO
Jackie Drummond – SWS/CO