

## Chao, Ming-tai

	Permit No.	Date	Document ID No.
<b>From:</b> Chao, Ming-tai	98-01	September 04, 2012	17159
<b>Sent:</b> Wednesday, July 18, 2012 10:02 AM	<i>Issued via a mail</i>		
<b>To:</b> 'Lori Phillips'	<i>Date: July 18, 2012</i>		
<b>Cc:</b> Mussler, Ed; 'Stacey Smith'; 'Andy Davis'	<i>Solid Waste Section</i>		
<b>Subject:</b> comments on the Wilson County Record Letter	<i>Raleigh Central Office</i>		

Dear Ms. Phillips:

I have conducted a review of the "Construction Record - 2011-2012 Dewatering Maintenance Project" (Doc ID 16903) at the closed Wilson County MSWLF (permit # 98-01) and have some concerns/comments stated below.

1. The Construction Record (on page 1) didn't describe the status of the two pumps which originally planned to be installed into wells GW-31 & GW-32 according to the approved "Dewatering Maintenance Operation Plan" dated September 2011 (Doc ID 15082). The As-Built Survey/Record Drawing (Sheet 3 of 6) in Attachment B indicated that pumps have been installed into the wells GW-31 & GW-32. Please describe the status of the two pumps associated with wells GW-31 & GW-32; or if there is any deviation from the original plan, please provide the causes resulted in this deviation. If the proposal of installing two pumps had been removed from the original plan during the course of the project, please revise the drawing (Sheet 3 of 6) accordingly.
2. The Construction Record – Air Supply and Condensate Forcemain Ping (on page 2) reported that "S+G verified pressure testing records provided by Methane Power in accordance with ASTM F-1417." The Attachment A shown the hydrostatic tests were conducted according to ASTM F 2164. Please explain the discrepancy.
3. The Construction Record – Temporary Above-Ground Storage Tank (AST) for Condensate Storage (on page 2). Please address the leachate/condensate management stated below:
  - i. The tentative schedule for condensate/leachate removal [Rule .1680(b)(3)].
  - ii. The descriptions of measurement and record keeping scheme of the generated and removed condensate/leachate. A typical form for recording the generated and removed quantities of liquid waste is needed [Rule .1680(b)(2)].
  - iii. The tank foundation analysis in Attachment C concluded that the constructed anchor system and foundation system can adequately provide a resisting moment of the empty AST against the maximum overturning moment resulting from wind force calculated from wind speed up to 110 mph. Will this statement be an implication that the County will be empty the tank and shut down the LFGCCs during the course of hurricane or natural disaster preparedness? If so, please add the statement as a portion of the contingency plan.
  - iv. Please describe the routine inspection of the AST [Rule.1680(c)(5)].
  - v. Please describe the closure of the AST [Rule .1680(f)].
4. The As-Built Survey/Record Drawing (Sheet 3 of 6) in Attachment B of the Construction Record must be signed, sealed and dated by a Professional Engineer registered in the State of North Carolina or a NC licensed surveyor.

5. According to the photo (on Page 2 in Attachment D) the identification numbers of the well GW-9 has been changed into EW-9. Has the change been done at all gas wells or just at the selected gas wells which involve to the Dewatering Project? Please clarify. To avoid any confusion in the future, please describe the variation of well identifications and revise the as-built drawing accordingly.

Please contact me if you have any questions of these comments/concerns.

Ming-Tai Chao, P.E.  
Environmental Engineer  
Permitting Branch, Solid Waste Section  
Division of Waste Management  
**(Mailing Address)**

**1646 Mail Service Center  
Raleigh, NC 27699-1646**

(Street Address)  
Green Square, 217 West Jones Street  
Raleigh, NC 27603  
**Tel. 919-707-8251**  
[ming.chao@ncdenr.gov](mailto:ming.chao@ncdenr.gov)  
<http://portal.ncdenr.org/web/wm/sw>

*E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.*

---

**From:** Lori Phillips [<mailto:lori@rsgengineers.com>]  
**Sent:** Monday, July 16, 2012 4:47 PM  
**To:** King, Henry; 'Pedreira, Rebecca'  
**Cc:** 'Haworth, Simon'; 'Ryan Hennessy'; [adavis@wilson-co.com](mailto:adavis@wilson-co.com); 'Stacey Smith'; [gary@blackrocke2.com](mailto:gary@blackrocke2.com); Chao, Ming-tai  
**Subject:** Wilson County Record Letter

Please find attached an electronic copy of the signed Wilson County Construction Record letter for the dewatering maintenance project. I am taking the signed copy over to the NCDENR office now.

Thanks,

**Lori Ann Phillips, P.E.**  
Project Engineer

**SMITH + GARDNER**

14 N. Boylan Avenue  
Raleigh, NC 27603

**P (919) 828.0577 x140**  
**F (919) 828.3899**  
**C (570) 760.3639**