

October 18, 2012

Permit No.	Date	Document ID No.
<b>98-01</b>	<b>October 18, 2012</b>	<b>17480</b>

Mr. Ming-Tai Chao, P.E.  
 1646 Mail Service Center  
 Raleigh, NC 27699-1646

Received via an e-mail  
 Date: **October 18, 2012**  
 Solid Waste Section  
 Raleigh Central Office

RE: **Response to Comments**  
**2011-2012 Dewatering Maintenance Project**  
**Wilson County MSWLF**

Dear Ming:

This letter is in response to your comments, submitted via email on September 5, 2012 (**attached**) concerning the Wilson County MSWLF Construction Record Letter for the 2011-2012 Dewatering Maintenance Project. Please find each of your comments in italics, response in **bold**, addressed below.

Comment No. 3 iii.

*Is there any time frame to finalize the revised contingency plan in Appendix B – Operation, Monitoring, & Maintenance Plan (Doc ID 11544) by including leachate management/approaches for hurricane preparedness? The Solid Waste Section expects that the revised plan is properly prepared prior to operating the full-scale dewatering system. The complete plan must be available in the operating record located in the Wilson County Landfill Facility.*

**S+G does not believe that a contingency plan is necessary for hurricane preparedness. Hurricane preparedness focuses on preventing liquid spills from open storage tanks and/or lagoons, and minimizing head on the liner of a landfill. These issues do not pertain to the dewatering maintenance project at the Wilson County MSWLF because 1) condensate is stored in a closed above ground storage (ABS) tank; and 2) the landfill is an unlined unit. Furthermore, the ABS tank has a safety "interlock" where the pumping system shuts down in the event the liquid in the tank reaches a set maximum. Furthermore, the dewatering system is operated as a convenience to enhance gas recovery and can be shut off in the event of extreme weather conditions.**

Comment No. 3 iii.

*Please be aware that Wilson County will ultimately be responsible for any spill clean-up should it occur; therefore, the revised contingency plan is required a review and approval from the representative (maybe Mr. Andy Davis) of Wilson County Landfill facility.*

**Please see e-mail from Mr. Andy Davis Attached.**

Comment No. 3 iv.

*Please provide a hard copy of the checklist for the weekly inspection of the leachate tank.*

**The inspection list is attached.**

**Comment**

*Please provide a cost estimate for decommissioning/deconstructing the components of the dewatering system (including the tank, pumps, etc.), capping lines, decontaminating components, removing foundation, sampling and preparing result report (assume no corrective action is required) etc. The estimated closure costs for the dewatering system will be added to the costs for decommission LFGCCS in the amount of \$20,771.00 approved in 2011. The final amount (I believe that Wilson County will ask Methane Power to cover this part) shall be a portion of the financial assurance for the MSWLF post closure cares will be due this fall.*

Please see Table 1 Attached.

Please feel free to contact us with any additional questions or comments at 919-828-0577 or by email below.

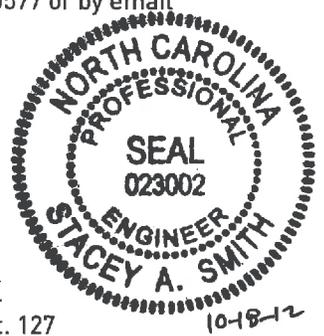
Sincerely,  
SMITH GARDNER, INC.



Cybele M. Brockmann  
Project Engineer, ext. 141  
[Cybele@smithgardnerinc.com](mailto:Cybele@smithgardnerinc.com)



Stacey A. Smith, P.E.  
Project Manager, ext. 127  
[stacey@smithgardnerinc.com](mailto:stacey@smithgardnerinc.com)



lap/sas  
att.

- Cc: Mr. Ryan Hennessey, Methane Power  
Ms. Rebecca Pedeira, Methane Power  
Mr. Bob Gettys, Methane Power  
Mr. Simon Haworth, Methane Power  
Andy Davis, Wilson County Solid Waste Department  
Gary Ahlberg, P.E., Blackrock Engineers  
File

**From:** Chao, Ming-tai [[mailto:ming\\_chao@ncdenr.gov](mailto:ming_chao@ncdenr.gov)]  
**Sent:** Wednesday, September 05, 2012 12:26 PM  
**To:** Stacey Smith ([stacey@smithgardnerinc.com](mailto:stacey@smithgardnerinc.com))  
**Cc:** Andy Davis; Mussler, Ed; Barnes, Ben; Shackelford, Dennis  
**Subject:** FW: Response to Comments on Wilson Dewatering System

Hey Stacey:

Thanks to hand deliver the hard copy of the "Response to Comments" dated 08/31/2012 to my office yesterday, I received the document this morning.

After completing a review of your responses to the 07/18/2012 comments (Doc ID 17519) on the Construction Record – 2011/2012 Dewatering Maintenance Project, I have additional questions described below:

1. The Response to Comment No. 3 iii.
  - Is there any time frame to finalize the revised contingency plan in Appendix B – Operation, Monitoring, & Maintenance Plan (Doc ID 11544) by including leachate management/ approaches for hurricane preparedness? The Solid Waste Section expects that the revised plan is properly prepared prior to operating the full-scale dewatering system. The completed plan must be available in the operating record located in the Wilson County Landfill Facility.
  - Please be aware that Wilson County will ultimately be responsible for any spill clean-up, should it occurs; therefore, the revised contingency plan is required a review and approval from the representative (maybe Mr. Andy Davis) of Wilson County Landfill Facility.
2. The Response to Comment No. 3 iv.
  - Please provide a hard copy of the checklist for the weekly inspection of the leachate tank.
3. Please provide a cost estimate for decommissioning / deconstructing the components of the dewatering system (including the tank, pumps, etc.), capping lines, decontaminating components, removing foundation, sampling and preparing result report (assume no corrective action is required) etc. This estimated closure costs for the dewatering system will be added to the costs for decommission LFGCCS in the amount of \$20,771.00 approved in 2011. The final amount (I believe that Wilson County will ask Methane Power to cover this part) shall be a portion of the financial assurance for the MSWLF post closure cares which will be due this fall.

Please just provide me a copy (one hard copy and one electronic copy) of the requested information. Thanks. Have a wonderful day.

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)  
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<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.*

## Stacey Smith

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**From:** Andy Davis <adavis@wilson-co.com>  
**Sent:** Monday, October 15, 2012 3:16 PM  
**To:** Stacey Smith  
**Subject:** RE: Wilson County Condensate Storage Tank Plan

Stacey,

Wilson County understands the responsibility as permit holder of the project. Wilson County also understands and agrees with the tank closure plan.

If you need anything please give me a call.

Thanks,

Andy Davis  
Wilson County Solid Waste Director  
PO BOX 1728  
Wilson , NC 27894-1728  
Phone#(252)399-2823  
Fax# (252)399-0904  
[adavis@wilson-co.com](mailto:adavis@wilson-co.com)

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**From:** Stacey Smith [<mailto:stacey@smithgardnerinc.com>]  
**Sent:** Tuesday, September 18, 2012 3:08 PM  
**To:** Andy Davis  
**Cc:** Cybele Brockmann  
**Subject:** Wilson County Condensate Storage Tank Plan

Andy,

As you are aware, we recently received comments from Mr. Ming Chao, P.E. of the NCDENR. One of his comments regarded the responsibility of Wilson County in the event of any spill cleanup. I have attached the Condensate Storage Tank Closure Plan for your review and approval. Please also be aware that some features were added to the tank to further prevent the potential of overflow as follows:

1. The incoming condensate lines were insulated and heat traced to prevent freezing during the winter as well as prevent UV exposure damage;
2. A high level switch was installed to "lock out" the incoming pump from operating in the event the tank is full.
3. A high level switch was installed to "lock out" the air to the pneumatic pump system to also prevent over filling of the pump station located at the flare.

For the purpose of response to Mr. Chao's concerns, please acknowledge Wilson County's understanding of the project, agreement with the tank closure plan, and the responsibility as the permit holder for the site.

Thanks,

Sas

**Stacey A. Smith, P.E.**  
President, Senior Engineer

**SMITH + GARDNER**

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**Wilson County Landfill  
Weekly Leachate Tank Inspection Checklist/Log**

Inspector Name:
Inspection Date:

**Inspection Guidance:**

1. The weekly aboveground storage tank (AST) inspection is intended for monitoring the external AST condition and its containment containment structure in accordance with the North Carolina Leachate Storage Requirements (15A NCAC 13B .1680). This visual inspection shall be performed by the responsible facility representative who is familiar with the site and can identify changes and developing problems.
2. **Complete this checklist weekly and retain all completed checklists for the lifetime of the AST.**

Item	Status			Comments
	Yes	No	N/A	
Drainage pipes/valves fit for continued service?				
Evidence of tank settlement or foundation washout?				
Cracking or spalling of concrete pad?				
Storm water able to drain away from tank?				
Tank supports in satisfactory condition?				
Noticeable shell/head distortions, buckling, denting, or bulging?				
Evidence of shell/head corrosion or cracking?				
Flanged connection bolts tight and fully engaged with no sign of wear or corrosion?				
Is the overfill protection system in working order?				
Vents free of obstructions?				
Insulation missing or exhibiting damage?				
Are there noticeable areas of moisture or mold on insulation?				
Are tank grounding lines in good condition?				
Are there any drips or signs of leakage?				

**Additional Comments:**

**TABLE 1**  
Wilson County MSW Landfill  
Gas Collection System Decommissioning Estimate

Decommissioning Elements	Item	Quantity	Unit	Cost	Subtotal	Comments
In advance of any decommissioning works, the site shall be inspected for adequate and safe operational conditions;	1	1	LS	\$1,000	\$1,000.00	Ratiff Engineering and Consulting Estimate
Remove all gas wellheads and flex-pipes;	1	1	LS	\$5,000	\$5,000.00	Ratiff Engineering and Consulting Estimate
Cut all horizontal header pipe protrusions 12 inches below grade;	31	31	EA	\$50	\$1,550.00	Ratiff Engineering and Consulting Estimate
Install concrete plugs in abandoned header pipe ends;	39	39	EA	\$100	\$3,900.00	Ratiff Engineering and Consulting Estimate
Fill hole to grade;	39	39	EA	\$50	\$1,950.00	Ratiff Engineering and Consulting Estimate
Remove above grade operator handles from buried valves;	8	8	EA	\$25	\$200.00	Ratiff Engineering and Consulting Estimate
Cut all sampling port vertical pipes 12 inches below grade plug pipes and backfill;	15	15	EA	\$100	\$1,500.00	Ratiff Engineering and Consulting Estimate
Remove the blower flare skid and any other mechanical and/or electrical equipment;	1	1	LS	\$0	\$0.00	Removed for Salvage Value
Remove flare station fencing;	1	1	LS	\$0	\$0.00	Removed for Salvage Value
Remove any condensate from the condensate sumps;	1	1	LS	\$0	\$0.00	Sumps will be drained as part of operation
Remove electro-mechanical equipment from condensate sumps, cut tops 12 inches below grade and back fill with suitable earth fill;	2	2	EA	\$1,000	\$2,000.00	
Remove all Generator sets (if installed) and their mechanical and/or electrical equipment;	0	0	LS	\$0	\$0.00	Not installed at this stage
Remove Generator set foundations till 12 inches below grade, backfill with suitable earth fill and revegetate;	0	0	LS	\$0	\$0.00	Not installed at this stage
Revegetate all disturbed areas;	1	1	LS	\$500	\$500.00	Smith Gardner Estimate
Monitoring of decommissioning work;	1	1	LS	\$1,000	\$1,000.00	Ratiff Engineering and Consulting Estimate
Drain, Remove, and Drain Storage Tank	9,500	9,500	GAL	\$0.50	\$4,750.00	Smith Gardner Estimate
Submit notification letter to NCDENR Division of Waste Management when decommissioning is complete	1	1	LS	\$1,000	\$1,000.00	Ratiff Engineering and Consulting Estimate
<b>Total Estimate</b>					<b>\$24,350.00</b>	

- NOTES:
- All costs are presented in current dollars and should be increased at an inflation rate prescribed by the NCDENR Division of Waste Management per <http://portal.ncdenr.org/web/ww/sw/financialassurance> if additional review is not performed annually.
  - This ESTIMATE has been prepared for financial assurance purposes only and shall not be considered a replacement for an actual bid from a licensed contractor and is considered acceptable within a +/- 10% of the Total Estimate value.

References:  
1. Operation, Monitoring & Maintenance Plan for Wilson County Landfill Gas Collection and Control System dated August 2010 prepared for MP Wilson, LLC by Ratiff Engineering & Consulting, PLLC

## Chao, Ming-tai

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**From:** Cybele Brockmann <cybele@smithgardnerinc.com>  
**Sent:** Thursday, October 18, 2012 12:41 PM  
**To:** Chao, Ming-tai  
**Cc:** 'Ryan Hennessy'; 'Pedreira, Rebecca'; 'Haworth, Simon'; robert@methanepower.net; gary@blackrockengineerse2.com; adavis@wilson-co.com; stacey@smithgardnerinc.com  
**Subject:** Response to comments - Wilson County MSWLF Construction Record  
**Attachments:** DWM comments response letter SIGNED - October 2012 with attachments.pdf

Hello Mr. Chao,

Please find attached, SG's response to your comments concerning the Wilson County MSWLF Construction Record letter for the 2011-2012 Dewatering Maintenance Project. Please feel free to call myself or Stacey with any questions. Thank you, Cybele Brockmann

**Cybele Brockmann**  
Staff Engineer

**SMITH + GARDNER**

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