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Backus	10/01/2013	19874	4112-MSWLF-1997



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

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October 1, 2013

Ms. Gail Hay, P.E.
Technical and Planning Support Manager
Field Operations Department
City of Greensboro
P.O. Box 3136
Greensboro, NC 27402-3136

Subject: Plan for Screening Pre-Regulatory Landfill Waste for Disposal
City of Greensboro Phase III MSWLF
Permit No. 4112-MSWLF-1997, Guilford County, DIN 19874

Dear Gail:

Thank you for showing me the area at the City of Greensboro (City) pre-regulatory landfill (NCD991279027) where Nealtown Road will be extended and providing me the opportunity to discuss your plans to screen the waste for disposal in the City of Greensboro, White Street Phase III, Municipal Solid Waste Landfill (MSWLF) (Permit 41-12). A significant amount of waste will have to be removed based on the design of the road. Disposal in this nearby landfill which is lined and equipped with leachate collection and treatment will be cost effective for the City, require less traffic through the surrounding community, and be more protective of the environment than the present location.

Under current statues and rules, an MSWLF restricts disposal of unacceptable waste by limiting the sources of the solid waste accepted, training facility staff to detect hazardous and other unacceptable materials, and implementing a waste screening program. The limits referenced in the Pre-Regulatory Unit report address waste left at the site and are not the same as acceptance criteria used at an MSWLF. An MSWLF typically does not require a chemical analysis for disposal. While it is known that some local industries disposed of waste at the pre-regulatory site which may have been hazardous, the waste characteristics, locations, and quantities are unknown. Analytical testing might also detect the presence of hazardous components from what we now define as household hazardous waste, an acceptable waste for MSWLF disposal. There are also special wastes, for example white goods and tires, which cannot be disposed at an MSWLF but which can be visually detected. We agreed that a site specific plan for screening waste prior and during the waste removal process was needed.

We discussed using the “contained-out” guidance document developed by the Hazardous Waste Section, reviewing the literature for the hazardous compounds found in household hazardous waste, conducting additional investigations in suspect areas indicated by the Pre-Regulatory Landfill Unit testing prior to starting the road project, and providing a person onsite during the removal to screen for waste unacceptable for disposal at an MSWLF. Your draft plan provided by email on August 1, 2013, incorporated these options.

Implementing this plan should prevent unacceptable materials being put into the landfill while reducing the amount of material that to be transported and disposed in other facilities.

Please keep me informed of your progress and let me know if I can be of further assistance.

Sincerely,

Patricia M. Backus, P.E.
Permitting Engineer
Solid Waste Section

cc: Dale Wyrick, P.E., City of Greensboro
Michael Scott, Solid Waste Section Head
Ed Mussler, III, P.E., Permitting Branch Supervisor
Cheryl Marks, Pre-Regulatory Landfill Unit Supervisor
Jason Watkins, Western District Supervisor
Hugh Jernigan, Senior Environmental Specialist