



North Carolina Department of Environment and Natural Resources

Division of Waste Management

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**Response to Public Comments  
Green Recycling Solutions LLC  
Maysville C&D Landfill  
Jones County, NC  
January 17, 2014**

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| <b>Comment No. 1:</b> | <b>Concern was expressed in an oral comment regarding the proximity of a slave graveyard to the landfill.</b>  |
| Response:             | <p>The applicant demonstrated that the nearest landfill related activity, which is a borrow soil source, will occur at least 1,360 feet from the cemetery on adjacent property.</p> <p>The cemetery is identified on the adjacent property plat, which is a part of the permit application record.</p>   |
| <b>Comment No. 2:</b> | <b>An oral comment was submitted concerning the relocation of a homeowner due to a N.C. Department of Transportation project that is related to the construction of the proposed landfill.</b>   |
| Response:             | <p>The Division of Waste Management has no knowledge of any irregularities concerning relocation of homeowners relating to construction of the landfill. No further information on this concern was given to the Division.</p>   |
| <b>Comment No. 3:</b> | <b>An oral comment was submitted regarding abandoned landfills and financial responsibility for clean-up and contamination costs.</b>  |
| Response:             | <p>Financial Assurance for the closure, potential corrective action and post-closure is required in the North Carolina Solid Waste Management Rules for C&amp;D landfills and will be enforced on the proposed facility. Financial Assurance protects the citizens and the State from potential harm from abandoned landfills.</p> <p>The Solid Waste Management Rules require the applicant to demonstrate and maintain financial assurance instruments for third-party costs associated with closure, post-closure care and maintenance and potential corrective action.</p> |
| <b>Comment No. 4:</b> | <b>An oral comment was submitted regarding the disposal of asbestos and other construction related wastes.</b>   |
| Response:             | <p>The North Carolina Solid Waste Management Rules along with the North</p>  |

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|                              | <p>Carolina Department of Health and Human Services, Epidemiology Section, Asbestos Hazard Management regulations contain strict procedures for the transportation, handling and disposal of asbestos containing materials.</p> <p>The rules North Carolina rules require asbestos containing material be managed in accordance with the US Federal Regulation 40 CFR 61. When received at the landfill, regulated asbestos waste must be covered immediately with soil in a manner that will not cause airborne conditions and must be disposed of separate and apart from other solid wastes in a defined isolated area within the footprint of the landfill or in an area not contiguous with other disposal areas. Separate areas must be designated so that asbestos is not exposed by future land-disturbing activities.</p> <p>As for the disposal of other wastes, environmental safeguards required at the facility include a double composite soil and plastic bottom liner including a leachate collection system. This landfill would be the first Construction and Demolition landfill constructed under legislation promulgated in 2007 that included those requirements.</p> <p>Also, the facility will install ground water monitoring wells that will indicate the occurrence of a contaminant release into the ground water. Funding mechanisms will be required to assure that potential corrective actions can be installed if needed.</p> |
| <p><b>Comment No. 5:</b></p> | <p><b>One commenter stated that another state ‘wants nothing to do with any kind of landfill.’</b></p>   |
| <p>Response:</p>             | <p>The statement does not represent our knowledge based on Division staff interaction with the other state’s agency staff. Regardless, however, the applicant has complied with the State of North Carolina Solid Waste Management Rules and is therefore fully entitled to the proposed permit to construct a C&amp;D landfill.</p> <p>In conversations with regulators in other states, the general consensus is that landfills are necessary, but that waste reduction and material recovery can minimize the number and size of landfills needed to service our growing populations.</p> <p>In addition to complying with the N.C. Solid Waste Management Rules, the applicant is proposing to establish a material recovery operation that will serve to minimize the amount of material disposed in the landfill.</p>  |
| <p><b>Comment No. 6:</b></p> | <p><b>Concern was expressed in an oral comment regarding the disposal of leachate generated at the proposed landfill.</b></p>  |
| <p>Response:</p>             | <p>The facility Leachate Management Plan in the approved application states that leachate will be hauled to the Town of Maysville or Pollocksville permitted</p>   |

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|                              | <p>waste water treatment plant.</p> <p>The landfill facility permit will require proper management of leachate including transportation to and disposal at a permitted waste water treatment works.</p>  |
| <p><b>Comment No. 7:</b></p> | <p><b>An oral comment was submitted regarding gypsum/wallboard getting wet and heating to 190 degrees.</b></p>   |
| <p>Response:</p>             | <p>Gypsum, the main ingredient in wallboard or sheetrock, will be a target material of the recovery operations at the facility, which may reduce the amount of gypsum disposed in the landfill. Markets, though limited, are available for recovered gypsum.</p> <p>Gypsum is a mineral and is not combustible. Wallboard made of gypsum does not conduct heat and does not pose any unusual fire hazard.</p> <p>Wall board can generate hydrogen sulfide gases when wet and disposed in significantly large amounts. Under normal recovery and disposal operations as described in the approved Facility Operations plan and authorized by the facility solid waste permit, hydrogen sulfide odors are not expected to be a concern.</p>  |
| <p><b>Comment No. 8:</b></p> | <p><b>One oral comment expressed concern that 8,400 landfill fires occur every year. Concerns included adverse effects on air and the potential to harm the plastic bottom liner.</b></p>  |
| <p>Response:</p>             | <p>Landfill fires are a reality that is addressed in the Federal and State Solid Waste Regulations. The applicant is required to mitigate the potential for fires through waste screening and the application of periodic soil cover material.</p> <p>Also, solid waste regulations require that a 2-foot layer of soil be placed over the bottom liner and leachate collection system, which helps protect the system from fire.</p> <p>The projected disposal rate is less than 60 tons of waste per day for the initial operating life of the landfill. The lack of material and the periodic application of soil cover material mitigates the conditions likely to lead to spontaneous combustion. Also, the small quantity of material at the landfill would reduce the potential environmental and property damage harm should a fire occur.</p> <p>Data from the US Fire Administration is commonly used for reference to landfill fires. The USFA web site includes a document under the Topical Fire Research Series [Vol. 1 Issue 18] that discusses landfill fires dated December 2001 [<a href="http://www.usfa.fema.gov/downloads/pdf/tfrs/v1i18.pdf">http://www.usfa.fema.gov/downloads/pdf/tfrs/v1i18.pdf</a>].</p> <p>The document states that identifiable causes of landfill fires include</p> |

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|                        | <p>smoldering embers in waste bins, spontaneous combustion of large piles of vegetative or putrescible wastes, matches and arson. Proper screening through the material recovery operation, acceptance of construction and demolition material, and required access control is expected to mitigate fires at the proposed landfill.</p> <p>The document does not distinguish whether the affected landfills were municipal solid waste, construction and demolition, or vegetative type facilities.</p>   |
| <b>Comment No. 9:</b>  | <b>Concern was expressed in an oral comment regarding ground water contamination resulting from waste disposal.</b>   |
| Response:              | <p>The proposed landfill will be constructed under requirements of the N.C. Solid Waste Management Rules that require the facility design and construction to integrate three significant environmental protection systems.</p> <p>The first consists of a combination of engineered soil and flexible membrane bottom liner system. Overtop of the bottom liner will be a leachate collection system.</p> <p>The third protective system will consist of ground water monitoring well system that will indicate the occurrence of a contaminant release into the ground water prior to reaching the property boundaries.</p> <p>Funding mechanisms will also be required to assure that potential corrective actions can be implemented as needed.</p> |
| <b>Comment No. 10:</b> | <b>Concern was expressed in an oral comment that enforcement actions were taken in other states when violations of the rules or permits occurred.</b>   |
| Response:              | <p>The NC-DENR Division of Waste Management routinely takes enforcement action when necessary. The Division also uses compliance and technical assistance practices to help avoid situations that may lead to enforcement actions.</p>  |
| <b>Comment No. 11:</b> | <b>One oral comment stated that the waste will be covered daily.</b>  |
| Response:              | <p>For clarification, construction and demolition landfills are required to cover wastes on a weekly basis, but not daily, which is the requirement for municipal solid waste landfills. C&amp;D landfills wastes do not generate the odors or attract vermin to the same degree as the rotting wastes found in municipal solid waste landfills and therefore are not required to apply cover material as frequently.</p>   |