



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

Pat McCrory
Governor

Dexter R. Matthews
Director

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Secretary

July 5, 2013

Mr. Pat Kresnak
IAC Group North America
5300 Auto Club Drive
Dearborn, Michigan 48126

Subject: Request for Additional Information
IAC Industrial Landfill
McDowell County, Permit # 5603I-INDUS-2009, Document ID 19197

Mr. Kresnak:

The Division of Waste Management, Solid Waste Section (Section) has completed a review of the document titled *Closure and Post-closure Plan* (DIN 18964). The document was submitted on your behalf by RJN Environmental, Inc. and was received in the Asheville Regional Office on May 13, 2013.

Based on this review, it has been determined the Section requires clarification or additional information in order to approve the Closure and Post-closure Plan. Please provide a response for each of the following items:

1. There is no indication edge of waste markers are planned for the disposal units. The boundary of all disposal units must be well marked with robust, highly-visible, permanent markers that must be maintained throughout the post-closure care period.
2. The second paragraph of Section 2.1, Development Concept, states, in part, Phase 1 is currently completely vegetated with trees and grasses and, as a result, it is unnecessary to clear the vegetation only to place another cap over the top. Given the waste material, and the fact Phase 1 has been inactive since 1982, the Section is not opposed to leaving the stabilized vegetation in place. However, a plan must be presented which takes into account the management of trees, cap maintenance and ensures the cap remains clear enough for visual inspection during the post-closure care period. In addition, the cap must meet the two feet minimum thickness as required by Rule .0505(3)(c).
3. Section 3.1, Mowing, states *mowing will not occur to allow for the growth of trees*. Again, a plan must be presented which takes into account the management of trees, cap maintenance and ensures the cap remains clear enough for visual inspection during the post-closure care period.
4. As you are aware, in accordance with General Statute (NCGS) 130A-295.2, all solid waste management facilities must demonstrate financial assurance. Financial assurance is defined as the ability of an applicant or permit holder to pay the costs of assessment and remediation in the event of a release of pollutants from a facility, closure of the facility in accordance with all applicable requirements, and post-closure monitoring and maintenance of the facility. In partial fulfillment

of this requirement, facilities must estimate the costs associated with closure, post-closure and potential assessment and corrective action activities.

The Closure and Post-Closure Care Plan submitted with the application includes cost estimates for closure and post-closure of Phases 1-3. Based on a preliminary review, the closure and post-closure cost estimates appear to be sufficient. However, there are no cost estimates provided for potential assessment and corrective action (PACA). In accordance with NCGS 130A-295.2(h), to meet the financial assurance requirements of this section, the owner or operator of a sanitary landfill shall establish financial assurance sufficient to cover a minimum of two million dollars (\$2,000,000) in costs for potential assessment and corrective action at the facility. Therefore, in order for the Section to approve the Closure and Post-Closure Care Plan, IAC must provide PACA cost-estimates for review. Please contact Mr. Brian Wootton, Permitting Hydrogeologist, at (919) 707-8258, or by email at brian.wootton@ncdenr.gov, regarding approval of the PACA cost estimates.

If you should have any questions regarding this matter please contact me at (828) 296-4703, or by email at allen.gaither@ncdenr.gov.

Sincerely,



Allen Gaither
Environmental Engineer

Cc: Mr. Robert Nowakowski – RJN Environmental, Inc.
Mr. Bill Wagner – SWS/ARO
Mr. Brian Wootton – SWS/RCO