



Environmental, Inc.

Permit No.	Date	DIN
56-03	July 19, 2013	19353

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RECEIVED

July 18, 2013

July 19, 2013

Solid Waste Section
Asheville Regional Office

RJN Project 010059.01

Mr. Allen Gaither
 North Carolina Department and Natural Resources
 Asheville Regional Office - Division of Waste Management
 2090 US 70 Highway
 Swannanoa, NC 28778

Re: Response to NCDENR "Request for Additional Information", dated July 5, 2013
 Old Fort Landfill - 1240 Parker-Padgett Road, Old Fort, North Carolina
 Permit 56-03

Dear Mr. Gaither:

RJN has written this letter in response to the North Carolina Department of Environment and Natural Resources (NCDENR) "Request for Additional Information", dated July 5, 2013. RJN is submitting this letter to document IACs intentions of providing the requested information. Once RJN collects the additional information as described below, RJN will include the additional information in a "Revised Closure Post-Closure Plan".

In response to the "Request for Additional Information", RJN has provided a response to each of the four items as described below.

- 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.*

This issue will be addressed in the revised Closure-Post Closure Plan by documenting the type and locations of the "edge of waste" markers that will be placed around the three phases of the landfill.

- The second paragraph of Section 2.1, Development Concept, states, in part, Phase 1 is currently 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).*

The Revised Closure Post-Closure Plan will include procedures that will be utilized to clear existing vegetation that is restrictive with regard to visual inspections of the cap. In addition, procedures will be discussed for maintaining and removing vegetation as needed to restrict erosion of the cap, and to repair any erosion that does occur.

With regard to the thickness of the cap in Phase 1, it has been reported to RJN that there is presently a 3-foot cap over the entire Phase 1 cell. However, since there are no reliable records that can document this, RJN will complete a physical survey of the Phase 1 cap to measure the soil thickness

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 period.*

The answer to the second item above, is also relevant to this request.

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 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 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.

Mr. Brian Wootton will be contacted in order to incorporate the PACA into Revised Closure and Post-Closure Plan.

If you have any questions or comments regarding this Revised Soil Erosion and Sediment Control Plan, please contact Robert Nowakowski at 248-219-9228.



Robert J. Nowakowski, CPG
Principal Geologist