

US EPA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAR 14 2000

March 14, 2000

Mr. Bob Hunter, Director
County of Buncombe General Services
30 Valley Street
Asheville, NC 28801

SUBJ: Buncombe County XL Proposal

Dear Mr. Hunter:

Thank you for your Project XL proposal on the Buncombe County leachate recirculation/gas recovery project for your landfill. The Environmental Protection Agency (EPA) has reviewed your proposal and, based on the proposal and information provided to my staff on February 9, I am pleased to inform you that EPA is prepared to work with you, the State of North Carolina, and appropriate stakeholders to develop a Final Project Agreement (FPA). The FPA will detail the expectations of Buncombe County, EPA, the State of North Carolina, and other project partners for the proposed leachate recirculation/gas recovery landfill project.

Project XL was established to test innovative strategies and, through this process, encourage excellence and leadership in environmental stewardship. I believe that your proposal shows the potential to accomplish these goals. Specifically, this XL proposal could offer a number of benefits:

- Acceleration of waste decomposition which should enhance groundwater protection;
- Early compliance with Clean Air Act requirements for municipal solid waste landfills through installation of a gas collection and control system;
- Reduction in emissions as a result of producing a more efficient landfill gas;
- Reduction of potential risk to workers and the community from transport of collected leachate to the POTW via tanker trucks;
- Improved leachate quality and, ultimately, discharge water quality to the receiving stream;

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- Reinvestment of cost savings in pilot projects to enhance integrated solid waste management practices in Buncombe County;
- Implementation of a leachate recirculation/landfill gas recovery process to allow for additional waste capacity and longer life of existing landfill cells, reducing the need for new landfill sites; and,
- Evaluation of the horizontal trench design for leachate recirculation/landfill gas recovery landfills by providing valuable large-scale operational data, which will increase our ability to identify and quantify performance advantages or limitations of the leachate recirculation/landfill gas recovery process.

In order to ensure that this project meets the Project XL criteria and to pursue the regulatory flexibility necessary to achieve the enhanced environmental results mentioned above, I would ask that your department address in more detail the following key project elements during development of the draft FPA:

1. Gas Collection and Control: It is our understanding that this site will comply with all applicable Clean Air Act regulations. Although no regulatory flexibility is being sought from air requirements for this project, we believe that it may be appropriate to include specific information in the FPA on the proposed gas collection and control systems that you will employ to attain superior environmental performance. Specifically, to address fugitive landfill gas emissions, the FPA should include a section which provides specifics on your gas collection and control plan, including how you propose to deal with failures in the gas collection and control system, how you intend to continue compliance with current air regulations, and what cover materials will be used to achieve collection efficiency. Copies of the landfill design capacity, non-methane organic compound emission rate report, and gas collection and control system design plans submitted under the landfill emission guidelines or new source performance standards should be included.
2. Monitoring, Reporting, and Evaluation: EPA soon will be soliciting operational data concerning the efficacy of leachate recirculation/gas recovery projects. We would expect to discuss the potential for monitoring and reporting that go beyond what is currently required. In addition to information demonstrating the proposed superior performance, we may want you to include data that would be instructive to us in finalizing new or additional rules for landfills desiring to recirculate leachate.
3. Reinvestment of Savings: EPA encourages you to set aside some percentage of the money saved by the flexibility provided to undertake studies or projects that would further the County's superior performance in integrated solid waste management practices. Early identification of these activities will be helpful in describing potential areas of superior environmental performance.

4. Engineering design: We will also be asking for specific information concerning the liner and system design, and contingency planning for any potential system failures. Specific information needs include, but are not limited to: 1) models and assumptions used to describe projected performance of the alternative liner system; 2) supporting data from cell 3 to the extent it has been collected; and, 3) the general geology of the area and any specific information about the geology at the site.

While it is not uncommon for other areas of special interest to appear during the development of an FPA, these areas have been identified within the EPA team as very important or of great opportunity. The team assigned to your project will help you scope and refine these areas of the project, as well as guide you through the development of the Final Project Agreement.

The EPA team assigned to this project encompasses the program offices with a direct stake in either the flexibility requested or the superior environmental performance to be gained. This team will be led by Michelle Glenn, Region 4 XL Coordinator (404-562-8674). EPA headquarters has assigned Sherri Walker (202-260-4295) as their point of contact. Ms. Glenn and Ms. Walker will both be available to provide you with guidance and direction as you develop the FPA.

If I can be of assistance in expediting the development and review of your FPA, please do not hesitate to call me at 404-562-8357. I look forward to working with you and your staff to reach agreement on a mutually satisfactory XL project.

Sincerely,



A. Stanley Meiburg
Deputy Regional Administrator

cc: Mr. Joe Wiseman, CDM
Mr. Bill Holman, Secretary, North Carolina Department
of Environment and Natural Resources