



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

Beverly Eaves Perdue
Governor

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Director

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Secretary

July 17, 2009

Memorandum

To: Solid Waste Directors/Managers

Subject: Edge-of-Waste Marker Memo

Background

Within the past several months, two situations have arisen that the Solid Waste Section thought it necessary to address immediately by issuing the memo requiring edge-of-waste (EOW) markers around disposal units.

The first situation involves active facilities disposing of waste outside of their permitted boundaries. This situation has occurred at lined and unlined facilities and as a preventive measure the Solid Waste Section is requiring the installation of the EOW markers.

The second situation involves the difficulty of identifying disposal units after they have been closed for several years. When facility staff move to different jobs or retire, many times the “institutional knowledge” about the facility and the location of disposal units is not transferred to the new employees. Some units can be easily identified years after closure because they are obvious topographic anomalies. Other units are not so obvious because they “blend” into the surrounding terrain or they were “trench fills.” Post-closure management (e.g. annual or semi-annual mowing and repair of soil caps and slopes) help to identify EOW, but this approach has also been proven unreliable.

The second situation described above has led to situations where development has encroached up to and sometime into originally established buffers around disposal units at facilities where the disposal unit is not easily identified. This situation has led to the installation of potable wells within 500 feet of a landfill which is a violation of state rules.

Because of the increasing occurrence of the situations described above, the Section thought it prudent and necessary to issue the EOW marker requirement memo. Please note that this requirement applies to solid waste landfills that received waste after December 31, 1982.

Memo Distribution

Knowing that unique facility circumstances would generate questions and, in many cases, necessitate on site discussion regarding the implementation of the marker requirement, and also realizing the concern that mass mailings of this type had generated in the past, the Section thought

it best to introduce the memo by hand delivering as many as possible the first few weeks of the summer during routine site visits. In a recent meeting with leadership representatives from the NC Chapter of SWANA, the Section learned that this approach caused some concern and confusion because some facilities received the memo prior to others through channels other than Solid Waste Section staff. The Section regrets the confusion that this caused.

If you have questions about your specific facility and the installation of the EOW markers, or any matter, please contact your area Environmental Senior Specialist or their District Supervisor or other member of the Solid Waste Section staff. For contact information, please see www.wastenotnc.org/swhome/FieldOpMapC.pdf

To view the May 29, 2009 Edge-of-Waste Markers please see www.wastenotnc.org/swhome/NewsPostings/Property_Line_Waste_Markers_Memo_052909.pdf