THE STATE OF SOUTH CAROLINA

In The Court of Appeals

APPEAL FROM THE ADMINISTRATIVE LAW COURT

Shirley C. Robinson, Administrative Law Judge

Appellate Case No. 2011-001141

Grand Bees Development, LLC,

Respondent,

v.

County of Charleston and South Carolina Department of Health and Environmental Control,

Appellants.

INITIAL REPLY BRIEF OF APPELLANT SOUTH CAROLINA DEPARMENT OF HEALTH AND ENVIRONMENTAL CONTROL

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STATEMENT OF THE CASE

On January 17, 2008, Appellant South Carolina Department of Health and Environmental Control ("DHEC" or "the Department") issued to Appellant Charleston County ("County") a modification to the construction, demolition, and land-clearing debris ("C&D") landfill permit ("Modified Permit") for the Bees Ferry Landfill ("Landfill")[1], Facility ID # 101001-1201, located at 1344 Bees Ferry Road in Charleston County, South Carolina. The initial permit was issued on October 17, 1997; however, the County has operated the Landfill in its current location since 1977. **(R. p. 4)**. The Modified Permit allowed an increase in the annual disposal limit, and in the expansion

[1] Before a new landfill regulation went into effect in May 2008, the Landfill was referred to as a construction, demolition, and land-clearing debris ("C&D") landfill. After the promulgation of the regulation, R. 61-107.19, the Landfill became known as a Class II landfill.

of the footprint and height of the existing landfill. These modifications were approved pursuant to S.C. CODE ANN. REGS. § 61-107.11 (Supp. 2006).

Respondent Grand Bees Development, LLC ("Grand Bees") filed a Request for Review of the Modified Permit by the DHEC Board on February 1, 2008. The Department informed Respondent by Memorandum dated February 19, 2008, that the DHEC Board had decided not to conduct a Final Review Conference. On April 18, 2008, Respondent filed a Notice of Request for a Contested Case Hearing with the Administrative Law Court ("ALC" or "Court").

The ALC held a hearing in the above-captioned matter with the Honorable Ralph King Anderson, Jr. presiding. On June 2, 2009, the ALC issued its *Final Order and Decision* holding that "DHEC's decision to grant the Modified Permit is vacated and this case is remanded for review in accordance with the ZLDR." **(R. p. 103, Tr. p. 180, lines 16-19)**. "ZLDR" is the acronym for County's Zoning Land Development Regulations.

Pursuant to the ALC's Order, Appellant DHEC reviewed the Modified Permit application in accordance with the ZLDR, which had been revised and amended by County on December 16, 2010. Upon Appellant's review of the amended ZLDR, it determined that the Modified Permit was consistent with the County's local zoning and land use ordinances. After review, Appellant re-issued the Modified Permit ("Second Modified Permit") on September 1, 2011.

On September 12, 2011, Respondent Grand Bees filed a Request for Review by the DHEC Board of the Second Modified Permit. Respondent was notified by Memorandum on October 13, 2011, that the Board declined to conduct a Final Review

Conference. On November 2, 2011, Respondent requested a contested case hearing regarding Appellant DHEC's re-issuance of the Second Modified Permit.

This matter was assigned to the Honorable Shirley C. Robinson, ALC Judge, on November 7, 2011. On March 20, 2012, a hearing on the merits was held. On March 19, 2013, Judge Robinson issued the *Final Order and Decision* ("*Decision*") in this matter, ordering "that DHEC'S decision on the Second Modified Permit (DHEC #101001-1201) is REVERSED and the Second Modified Permit is hereby VACATED." (**R. p. 19**).

Both Appellants, DHEC and County, timely moved the Court for Reconsideration of the ALC's *Final Order and Decision ("Decision")*, but such Reconsideration was denied by formal Order on May 8, 2013.

On May 24, 2013, County, filed its Notice of Appeal with the South Carolina Court of Appeals ("Court of Appeals"), and on May 29, 2013, DHEC filed its Notice of Appeal with the Court of Appeals. Initial Briefs from Appellants, both the County and DHEC, were filed on June 24, 2013, and July 29, 2013, respectively. Respondent Grand Bees filed its Initial Brief of Respondent ("Response") in response to both County's and DHEC's Initial Briefs. County filed an Initial Reply Brief to Grand Bees' Response to County's Initial Brief of Appellant on September 3, 2013.

STATEMENT OF FACTS

County's initial request for a modification to the Landfill's original permit requested a five (5) acre expansion of the Class 2 Landfill within its three hundred and twelve (312) acre solid waste management facility on Bees Ferry Road in Charleston, South Carolina. The expansion request also included an increase of the Landfill's height to match the previously adjacent permitted Class 3 Landfill. A Modified Permit was

granted on January 17, 2008, but the ALC vacated the Modified Permit and remanded the case for review in accordance with the ZLDR. **(R. p. 103, Tr. p. 180, lines 16-19).**

After Appellant DHEC reviewed the proposed Landfill in accordance with the ZLDR, on September, 1, 2011, it issued a Second Modified Permit for the Bees Ferry Landfill, Facility ID # 101001-1201, which is located at 1344 Bees Ferry Road in Charleston County, South Carolina. The initial permit was issued on October 17, 1997. The Second Modified Permit allowed an increase in the annual disposal limit and the expansion of the footprint and height of the existing landfill. These modifications were approved pursuant to S.C. CODE ANN. REGS. § 61-107.19 (Supp. 2006).

The Department's review of County's Modified Permit request is the type of review the Department has performed numerous times. This review entails the Department reviewing the proposed Modified Permit in a manner that ensures that the issuance of the modification is pursuant to and in adherence with S.C. Code Ann. § 44-96-290(F), which states, in general, that no permit to expand an existing solid waste management facility within a county may be issued by the Department unless the proposed expansion is consistent with local zoning, land use, and other applicable local ordinances. Mr. Kent Coleman, DHEC Director of Solid Waste and Mining, testified at the ALC Hearing that Section 44-96-290(F) was adhered to by the Department during the consistency review of the proposed Second Modified Permit.

The record shows that the Second Modified Permit that DHEC granted to County was consistent with all applicable ordinances and that DHEC conducted a proper consistency review pursuant to the applicable statutes and regulations. Despite Grand

Bees' arguments, DHEC rightly found County's proposed Landfill to be consistent with County's applicable local ordinances, as required by Section 44-96-290(F).

One of Grand Bees arguments is that the Modified Permit does not conform to the surrounding environment and future development of the area. In support of that argument Grand Bees states that "at the time of the hearing before the ALC, Grand Oaks consisted of nine districts and completed neighborhood totaling approximately 1,500 homes, infrastructure, parks, and other amenities." **(R. p. 2)**. However, the surrounding neighborhood expanded with the knowledge that the landfill was there (since 1997) and would be there for an indefinite period of time. The community's co-existence with the Landfill reflects County's zoning designation for each entity and the fact that the Modified Permit is consistent with County's local ordinances.

Another of Grand Bees' arguments is that landscaping plans are required to be obtained from the applicant before DHEC determines consistency with a county's buffer requirements. However, in making this argument, Grand Bees omits words from Mr. Lester's testimony, which could lead one to believe that this is a requirement of the State or DHEC. Grand Bees states that Mr. Lester testified that in practice, landscaping plans are submitted and required to prove compliance with buffer and landscaping regulations as a precondition to land development. ***(Grand Bees Initial Reply Brief*, p. 11)**. The actual testimony by Mr. Lester regarding landscaping plans was that he answered in the affirmative when asked the following: "And when you're submitting a proposed plan to that **local government**, are you required to actually show those, depict it on your plan?" (*Emphasis added*). **(R. p. 85, Tr. p. 105, lines 21-24)**. According to Mr. Lester, landscaping plans are required by a local government. There is no statutory or regulatory

requirement for DHEC to obtain landscaping plans from a landfill applicant prior to it making a consistency determination.

Grand Bees' argument that DHEC should have considered "planned and proposed residences" in the definition for residence, is not supported by case law, and would have an absurd and negative impact to the implementation of this requirement. The regulatory requirement states that "the waste disposal boundary of the landfill shall not be located within one thousand feet of any residence, school, day-care center, hospital or publicly owned recreational park area." 8 S.C. Code Ann. Regs. 61-107.19, Part IV, (B)(1)(a). Since there is no definition of "residence" in the statute or regulation, DHEC looked at the plain meaning of "residence," which, as found in Webster's Third New International Dictionary 1931 (1966), is "the act or fact of abiding or dwelling in a place for some time; an act of making one's home in a place; the place where one actually lives or has his home as distinguished from his technical domicile; the place where something is permanently established; a building used as a home." There were no "residences," as defined by Webster's, which met this definition that were within 1000 feet of the proposed Landfill. DHEC interprets the requirement of the thousand feet setback requirement as implemented to serve as protection for actual residences with the boundary. Otherwise what purpose would such a setback serve if there were no people occupying or utilizing a "residence." DHEC made the correct determination that there were no "residences," per this definition, and therefore, the issuance of the Second Modified Permit should be upheld.

DHEC stands by all of its previous arguments in its Initial Brief regarding the "residence" issue and will not include any additional argument on this in this Reply Brief.

DHEC's assertion that it determined that the Modified Permit was consistent with the county's local zoning and land use ordinances should not be disregarded and the determination should be upheld.

STANDARD OF REVIEW

Appellate review of an ALC decision is governed by S.C. Code Ann. § 1-23-610, which states:

> (B) The review of the administrative law judge's order must be confined to the record. The court may not substitute its judgment for the judgment of the administrative law judge as to the weight of the evidence on questions or fact. The court of appeals may affirm the decision or remand the case for further proceedings; or, it may reverse or modify the decision if the substantive rights of the petitioner have been prejudiced because the finding, conclusion, or decision is:
>
> (a) in violation of constitutional or statutory provisions;
> (b) in excess of the statutory authority of the agency;
> (c) made upon unlawful procedure;
> (d) affected by other error of law;
> (e) clearly erroneous in view of the reliable probative and substantial evidence on the whole record; or
> (f) arbitrary or capricious or characterized by abuse of discretion or clearly unwarranted exercise of discretion.

S.C. Code Ann. § 1-23-610(B) (Supp. 2012).

ARGUMENTS

I. THE ALC COMMITTED ERROR OF LAW BY CONCLUDING THAT DHEC IS REQUIRED TO REVIEW ALL LOCAL ORDINANCES EVEN IF THE LANDFILL PROJECT IS CONSISTENT WITH THE LOCAL ZOINING, LAND USE, AND OTHER APPLICABLE ORDINANCES NEEDED TO MAKING A CONSISTENCY DETERMINATION. **(R. p. 12)**

The Department's argument is that the Administrative Law Court ("ALC") committed error of law by concluding that DHEC's failure to review Section 10-22 was grounds for rejecting DHEC's consistency determination **(R. p. 13)** and that DHEC is required to consult all applicable land use ordinances in the Code. **(R. p. 12)**. The ALC

committed error of law because the applicable statute governing DHEC's consistency review process, is S.C. Code Ann. § 44-96-290(F) (Rev. 2002), which states that "no permit to construct a new solid waste management facility or to expand an existing solid waste management facility within a county or municipality may be issued by the department unless the proposed facility or expansion is consistent with local zoning, land use, and other *applicable local ordinances . . ..*" (*Emphasis added*). Since this statute has no requirement for DHEC to **consult or review** all ordinances, DHEC's failure to review Section 10-22 was not significant, as concluded by the ALC, or fatal to the issuance of the Second Modified Permit.

DHEC admitted on the record regarding Section 10-22 that it did not "see" or "did not recall seeing it," the ordinance, during the consistency review process. **(R. p. 108, Tr. p. 199, lines 4-11)**. However, the fact that DHEC did not review Section 10-22 does not mean that it failed to adhere to the requirement of Section 44-96-290(F), which is to issue a permit that it consistent with local ordinances. DHEC did not violate the governing statute because the Modified Permit issued to County for its Landfill was consistent with all applicable local ordinances, as testified to by Mr. Kent Coleman, DHEC Director of Solid Waste and Mining. **(R. p. 109, Tr. p. 201, lines 1-6)**. Even though DHEC staff did not specifically consult/review Section 10-22, its overall review took into account the criteria in Section 10-22, as per the testimony of Kent Coleman. Mr. Coleman testified that the Department did consider whether the significant expansion of the landfill conformed with the surrounding environment. **(R. p. 112, Tr. p. 213, lines 6-10)**. He also testified that included in the review of the surrounding environment that was considered were "the zoning ordinances and adjacent uses per the local zoning" **(R.**

p. 112, Tr., p. 213, lines 13-14) and that a review was done of "all the siting criteria in the DHEC solid waste management regulation as it relates to adjacent properties in terms of groundwater protection, protection of the public and et cetera." **(R. p. 112, Tr., p. 213, lines 15-19)**. Mr. Coleman further testified that DHEC also considered whether the significant expansion of the landfill conformed with future development of the area. **(R. p. 112, Tr., p. 214, lines 1-4)**. Mr. Coleman testified that, in considering whether the landfill conformed with future development of the area, the Charleston County ZLDR was reviewed to ensure that the Landfill was properly zoned under the Charleston County zoning ordinance in terms of what activities could be undertaken on that property. **(R. p. 112, Tr. p. 214, lines 10-14)**. Mr. Coleman said the Department found that the proposed Landfill was in compliance with the stated criteria. **(R. p. 112, Tr., p. 214, lines 14-15)**.

Mr. Coleman also testified that "DHEC doesn't make decisions for local governments on what conforms and what does not conform. Local governments do that through zoning and . . . they have made decisions of what types of uses can be next to other types of land uses . . . through their zoning . . . on . . . what is conforming, what conforms." **(R. p. 108, Tr. p. 200, lines 2-12)**. Mr. Coleman also testified that "Charleston County . . . have a very detailed zoning ordinance that talks about all the various uses, how those uses are to be applied. So by reviewing that – that document and making a decision, DHEC has determined that the permit that we issued is consistent with local zoning." **(R. p. 108, Tr. p. 200, lines 13-20)**. Mr. Coleman further testified that the generalized language in Section 10-22 did not change or specify anything about the requirements that the local zoning did not already cover. **(R. p. 108, Tr. p. 200, lines 20-25)**.

Therefore, pursuant to Mr. Coleman's testimony, even though Section 10-22 was not consulted or reviewed, the criteria listed in that ordinance was considered, and the proposed Landfill was found to be consistent with the ordinances' stated criteria. Thus, since the Department found the proposed Landfill to be consistent with the criteria set forth in Section 10-22, the ALC committed error of law in concluding that DHEC is required to review all local ordinances because there is no such requirement in the governing statute, Section 44-96-290(F).

A. A review of Section 10-22 was encompassed in DHEC's review of the ZLDR and even if DHEC had reviewed Section 10-22 DHEC's ultimate consistency determination would not have changed.

Mr. Coleman stated on the record that "it was very clear and very specific, that we were to reconsider the permit in regard to Charleston County zoning." **(R. p. 103, Tr. p. 180, lines 23-25)** and that DHEC reviewed the Second Modified Permit request against the Charleston County ZLDR. **(R. p. 110, Tr. p. 1-9)**. A review of Section 10-22 was encompassed in DHEC's review of the ZLDR and the ultimate result is that the Second Modified Permit was consistent with all applicable local ordinances.

The issue is not whether DHEC ever reviewed Section 10-22, but that in not reviewing Section 10-22, did DHEC issue a Second Modified Permit that was not consistent with applicable local ordinances. There is no substantial evidence in the record to refute that the Second Modified Permit issued to the County was consistent with all applicable local ordinances, and thus the issuance of the Second Modified Permit should be upheld. Moreover, Section 10-22's vagueness renders it inapplicable as an ordinance upon which the Department could have based a consistency determination.

The fact that there is no definition of "conform" in the ordinance is a prime example of the ordinance being too vague to use as a basis for a consistency determination.

Also, Grand Bees' argument that DHEC is required to review all local ordinances even if a landfill project is consistent with a County's local zoning, land use, and other applicable ordinances needed to make a consistency determination leads to an absurd result. Their argument suggests that even if the oldest (Section 10-22 was adopted by County in 1974) and most obscure ordinance is not reviewed during the consistency review process, and even if the permit issued is consistent with all applicable local ordinances, the review process should be re-opened and re-done. The requirement of S.C. Code Ann. 44-96-290(F) is that no permit be issued that is not consistent with all applicable local ordinances, not that all applicable local ordinances must be reviewed before a permit or permit modification can be issued. This was not the Legislature's intent, and there is no evidence on the record supporting Grand Bees' argument. The testimony on the record from Mr. Kent Coleman is that even if DHEC had known about and reviewed County's local ordinance, Section 10-22, before issuing the Second Modified Permit for the Landfill, the Department still would have found that the Second Modified Permit was consistent with all local ordinances. **(R. p. 105, Tr. p. 186, lines 2-9)**. Mr. Coleman expounded upon his testimony by stating:

> "as we have proceeded through our normal job activities related to this landfill, as in any other landfill, we have remained aware of the situations around the landfill. We've been out and visited the site and . . . there are no new residences. The demonstration of need has not changed . . . and the only thing that's changes . . . would be the County's change in the zoning, which is what we did reconsider based on the Judge's order."

(R. p. 105, Tr. p. 186, line 14- p. 187, line 6).

Pursuant to the foregoing, DHEC's issuance of the Second Modified Permit should be upheld.

II. THE ALC COMMITTED ERROR OF LAW IN CONCLUDING THAT THE SECOND PERMIT MODIFICATION IS NOT COMPLIANT WITH LOCAL ZONING AND LAND USE REGULATIONS, AS IT RELATES TO THE COUNTY'S VEGETATIVE BUFFERING REGULATIONS BECAUSE NO LANDSCAPING PLAN OR OTHER DOCUMENTATION DEMONSTRATING COMPLIANCE WAS MADE PART OF THE PERMIT APPLICATION OR THE SECOND PERMIT MODIFICATION. **(R. p. 15)**

The ALC committed error of law in concluding that DHEC's granting of the Second Permit Modification was not compliant with local zoning and land use regulations, as it relates to Article 9.5 of the ZLDR, the County's vegetative buffering regulations. The ALC committed error of law because there is no requirement, in either applicable statute or regulation, that requires the Department to obtain from a landfill applicant a landscaping plan or other documentation to demonstrate compliance with Section 44-96-290(F).

Mr. Coleman's hearing testimony regarding Article 9.5 of the ZLDR was as follows:

" . . . . to have a buffer or a vegetative buffer is . . . very common and the way we handle that is in our . . . plan – the plan that's submitted to DHEC, . . . there is a 100-foot buffer designated, which is consistent with DHEC's buffer requirements. Also, it is consistent with the County's buffer requirements in terms of the distance. . . . when we make our review . . .." **(R. p. 109, Tr. p. 203, lines 17-25; Tr. p. 204, lines 1-2)**.

Mr. Coleman further testified that:

". . . we make sure there's nothing in the . . . way the structures are placed and that type of thing within the DHEC application that would prohibit someone or make . . . them unable to comply with the vegetation requirements. But the vegetative requirements such as this are common and . . . that's not something that is required to be done prior to the permitting." **(R. p. 109, Tr. p. 204, lines 2-10)**.

Mr. Coleman's testimony continued:

" . . . a good example of how to think about that is if . . . you're building a house and someone – there may be an ordinance requiring you to grass the front yard and put in shrubbery . . . but they don't make you do that before you get your building permit and . . . before you build the house, because that doesn't make any sense." **(R. p. 109, Tr. p. 204, lines 11-19)**.

Mr. Coleman also testified that:

" . . . you realize those requirements are there. There's nothing impeding you from doing those requirements. And then it's up to the County to enforce their own zoning, which includes these buffer and shrubbery requirements . . . as long as . . . it can be complied with in the scope of the project, then it's really up to the County to enforce that beyond that point." **(R. p. 109, Tr. p. 204, lines 20-25, R. p. 110, Tr. p. 205, lines 1-4)**.

The foregoing testimony by Mr. Coleman outlines the Department's policy for reviewing county requirements regarding vegetative buffers for a proposed landfill. The essence of Mr. Coleman's testimony is that if the Department determines that a landfill applicant has included a buffer in its plans for its proposed landfill that meets the size of a county's required buffer, then a proposed landfill is considered capable to meet the county's buffer requirement, including a vegetative or shrubbery buffer requirement, and the buffer is also determined to be consistent with the county's vegetative or shrubbery buffer requirement. Once this determination is made, and if the landfill applicant is issued a landfill permit, the Department leaves it to the county to enforce its vegetative or shrubbery buffer requirement.

There is nothing in the process that Mr. Coleman testified about, or anything in applicable statutes or regulations, which prohibits the Department from finding a proposed buffer consistent through this type of process. Additionally, there is no evidence on the record to show that DHEC is prohibited from employing this process to make consistency determinations regarding county buffer requirements. In fact, if the

Department were to list in its Consistency Memorandum each and every ordinance, criteria, issue, or concern that it took into consideration during its consistency review, and also give a detailed description of how it came to its consistency determination on each and every item considered, the document would take a very long time to write and would be quite lengthy, not to mention the fact that there is no indication from any applicable statute or regulation that this is what the Legislature intended.

Therefore, pursuant to the foregoing, the ALC's conclusion that DHEC erred in granting the Second Modified Permit because there is no landscaping plan or other documentation demonstrating compliance in the permit application, is error of law and should be overturned.

CONCLUSION

For the reasons stated, this Court should reverse the judgment of the Administrative Law Court.

Respectfully submitted,

10-28-, 2013

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CERTIFICATE OF SERVICE

I, Donna K. Hellerman, for the South Carolina Department of Health and Environmental Control, hereby certify that I have on this 28 **day of** October, **2013,** served a copy of the ***Initial Reply Brief of Appellant South Carolina Department of Health and Environmental Control*** upon all parties and counsel of record in the above-captioned case, via United States Mail, First Class, postage prepaid, addressed as follows:

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