

DIN 20000

10/17/2013

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The NC Solid Waste Section has completed a review of the Water Quality Monitoring Plan for Craven Ag Service (CAS) Compost Facility submitted by Cpec Environmental Inc. on behalf of Craven Ag Service and has the following comments:

Groundwater and surface water monitoring network:

In an effort to reduce costs for the CAS facility, the NC SWS suggests eliminating the proposed mid-site monitoring well, MW-2, from the monitoring well network. The upgradient well MW-1 and two downgradient wells appear to adequately capture and therefore monitor groundwater flow beneath the site. The surface water sampling point MW-2 proposed in the seasonal ditch running through the middle of the site will be sufficient to monitor surface water in that area. Surface water sampling points SW-1 and SW-3 are positions to capture surface water flowing onto and off of the site, respectively.

Constituent List:

The NC Solid Waste Section (Section) requests that the three groundwater monitoring wells and three surface water sampling locations be sampled for the following parameters:

Appendix I metals plus Mercury and Molybdenum;

Herbicides by Method SW-846

Pesticides by Method SW-846

Total coliform bacteria

Ammonia, Nitrate, Nitrite

pH

Specific conductance

Sampling frequency:

Again, in an effort to reduce monitoring costs for the CAS facility, the Section is requesting that the three groundwater and three surface water sampling points be sampled for all of the above listed constituents on an ANNUAL basis. The Section requests that the samples be collected during a time of year when water is expected to be present in the seasonal ditch running through the middle of the site, anticipated to be sometime during the months October through March, so that a representative surface water sample can be collected from location SW-2.

The Section will continue to allow the facility to sample on an annual basis until an exceedance is detected at any of the sampling locations. For the purpose of this Water Quality Monitoring Plan, an exceedance will be considered a concentration above 2L groundwater standards or 2B surface water standards, or a significant increase above background concentrations. At that time, the annual sampling frequency will be reevaluated and a potential corrective action plan may be required.