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



Michael F. Easley, Governor
William G. Ross Jr., Secretary
Dexter R. Matthews, Director

August 19, 2003

Mr. Herman Crawford
Public Works Business Center - Environmental Branch
XVII ABN Corps - Fort Bragg
Fort Bragg, NC 28307-5000

RE: Assessment Monitoring Requirements - Fort Bragg Closed Landfill (Permit # 26-02)

Dear Mr. Crawford:

The Fort Bragg Landfill is in an assessment groundwater monitoring program and therefore must complete the requirements of *15A NCAC 13B .1634*. In addition to requiring sampling and analyzing for Appendix II contaminants and characterizing the extent of the contamination, which have been done, *Rule .1634* also requires that a number of other steps be taken. Included is the initiation of an assessment of corrective measures as described in *Rule .1635* if concentrations of contaminants are determined to be statistically greater than approved groundwater protection standards [*.1634 (g)(1)(D)*]. These requirements were noted in correspondence to Fort Bragg dated March 4, 1998 (see attachment).

The statistical analyses of monitoring results received thus far by the Solid Waste Section have been comparisons of downgradient monitoring well data to upgradient or background data, but not to groundwater protection standards. Consequently it will be necessary to complete this requirement of *Rule .1634*. As stated previously, groundwater protection standards have been established for most detected Appendix II constituents and they conform to *15A NCAC 2L* groundwater standards.

Fort Bragg must proceed with completing the remaining requirements of *Rule .1634* within the next 90 days. If the conditions of *Rule .1634 (g)* are met, it will be necessary to fulfill the requirements of *Rule .1635*.

Failure to comply with solid waste management rules could result in compliance actions with administrative penalties.

Thank you for your cooperation. If you have any questions, please call me at (919) 733-0692, extension 257.

Sincerely,



Larry Rose
Environmental Compliance
Solid Waste Section

cc: Mark Poindexter - Head, Field Operations Branch
Mark Fry - Eastern District Supervisor
Dennis Shackelford - Waste Management Specialist
Attachment

1646 Mail Service Center, Raleigh, North Carolina 27699-1646
Phone: 919-733-0692 \ FAX: 919-733-4810 \ Internet: www.enr.state.nc.us/



DEPARTMENT OF THE ARMY
INSTALLATION MANAGEMENT AGENCY
HEADQUARTERS, FORT BRAGG GARRISON COMMAND (AIRBORNE)
FORT BRAGG, NORTH CAROLINA 28310

CF
FACILITIES
CUMBERLAND
26-02

REPLY TO
ATTENTION OF:

April 8, 2003

APR 2003

Public Works Business Center

Mr. James Coffey
Division of Solid Waste
North Carolina Department of Environment
and Natural Resources
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Dear Mr. Coffey:

During the quarterly sampling event at the closed Municipal Solid Waste Landfill (MSWLF) located on Longstreet Road, Fort Bragg, North Carolina, several samples taken from the boundary of the MSWLF exceeded the lower explosive limit (LEL) for methane. The site was immediately secured, evaluated, and determined safe by the Fort Bragg Fire Department. However, methane levels did not exceed five percent of the LEL at facility structures inhabited by employees.

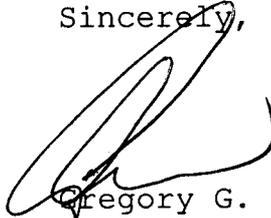
On 4 April 2003, Mr. David Heins, Chief, Environmental Sustainment Office, Public Works Business Center notified Mr. Larry Rose, North Carolina Department of Environment and Natural Resources, Solid Waste Section by telephone that the samples exceeded the limits as identified in the Methane Monitoring Plan. In accordance with the North Carolina Administrative Code 15A NCAC 13B.1626, owners or operators of all MSWLF units must ensure that the concentration of methane gas does not exceed the lower explosive limit for methane at the facility property boundary. If methane gas levels exceeding this limit are detected, the owner or operator must immediately take all necessary steps to ensure protection of human health and notify the Division.

Fort Bragg contracted with the United States Army Corps of Engineers to conduct additional methane monitoring on April 7, 2003 confirming the high methane levels at the property boundary. Fort Bragg will develop a remediation plan for the methane gas releases. Due to fiscal constraints and Federal Acquisition (Contracting) practices, the implementation of a remediation plan is scheduled for November 2003. We request an

extension for implementation of the remediation plan until
November 30, 2003.

If you need additional information, please contact Mr. David
Heins, 910-396-8207, email: heinsd@bragg.army.mil.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory G. Bean". The signature is stylized with a large, sweeping initial "G" and "B".

Gregory G. Bean
Colonel, U.S. Army
Director of Public Works
Business Center

NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES

DIVISION OF WASTE MANAGEMENT

March 4, 1998

Mr. Bill Squire
Public Works Business Center
Attn: Environmental Branch
AFZA-PW-EE
Fort Bragg, N.C. 28307

Re: Implementation of Groundwater Assessment and Corrective Action
Requirements (Permit #26-02).

Dear Mr. Squire,

Fort Bragg has fulfilled the municipal solid waste landfill requirements of North Carolina Solid Waste Management Rules, 15A N.C.A.C. 13B, .1633 (Detection Monitoring Program) and .1634 (Assessment Monitoring Program), parts (a) and (b). Based on groundwater monitoring data from the facility Fort Bragg is now required to proceed with the remaining requirements of .1634, .1635 (Assessment of Corrective Measures), .1636 (Selection of a Remedy), and .1637 (Implementation of the Corrective Action Program). These requirements are intended to be self-implementing. Please proceed to implement these requirements within sixty (60) days.

Groundwater protection standards have been established for most Appendix II constituents detected in assessment monitoring. In general, the groundwater protection standards conform to N.C. 2L Groundwater Standards or recommended health-based concentrations determined by the Division of Epidemiology. If needed, these groundwater protection standards are available upon request to the Division of Waste Management, Solid Waste Section.

If you have any questions, please contact Mark Poindexter at (919) 733-0692, extension 261.

Sincerely,


Dexter Matthews, Section Chief
Solid Waste Section
Division of Waste Management

c: Phil Prete
Terry Dover
Isaiah Guyton
central file

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