



North Carolina Department of Environment and Natural Resources

Pat McCrory
Governor

Donald R. van der Vaart
Secretary

March 2, 2015

Sent Via Email – seth.heath@wasteindustries.com

Mr. Seth Heath
General Manager
Waste Industries of High Point
5830 Riverdale Drive
Jamestown, NC 27282

Re: *Alternate Source Demonstration: Anomalous Detections of Volatile Organic Compounds*
Waste Industries of High Point C&D Landfill
Guilford County
Solid Waste Permit Number 41-16
DIN 23892

Dear Mr. Heath:

The Solid Waste Section has completed a review of the *Alternate Source Demonstration: Anomalous Detections of Volatile Organic Compounds* dated February 3, 2015 (DIN 23890) and submitted on behalf of Waste Industries USA, Inc. by Golder Associates NC, Inc. for the Waste Industries of High Point C&D Landfill, Solid Waste Permit Number 41-16. The *Alternate Source Demonstration* was submitted in accordance with 15A NCAC 13B .0544(b)(1)(l), and in response to volatile organic compounds detected within groundwater monitoring well MW-2 during the July 2014 monitoring event. The constituents of concern include acetone, benzene, cis-1,2-dichloroethene, ethylbenzene, methylene chloride, toluene, and vinyl chloride. Benzene and vinyl chloride exceeded the Groundwater Standards during this monitoring event.

A field investigation was conducted in October 2014 to determine the source of the constituents of concern. Groundwater and headspace/gas samples were collected. The groundwater samples were submitted for analysis of NC Appendix I volatile organic compounds, water quality parameters, and/or leachate indicator parameters, and the air samples were submitted for analysis of volatile organic compounds.

Based upon current site conditions, and the preliminary investigation conducted, Waste Industries is requesting additional time to assess the potential sources of the volatile organic compounds detections within groundwater monitoring well MW-2 and to acquire additional data from routine semiannual monitoring events to evaluate trends.

As a result, the request for additional time to assess the potential sources of the low levels of volatile organic compounds is approved for six additional months from the date of this letter. The facility will remain in the detection monitoring program during this six month evaluation period. This will also allow for both the 2015 Winter and Summer semiannual monitoring events to be conducted and analytical results to be reviewed. After the six month period, if any volatile organic compounds exceed the

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Groundwater Standards, the facility will be required to begin the assessment monitoring program.

If you have any questions or concerns regarding this letter, please feel free to contact me at 828.296.4706 or by email at jaclynne.drummond@ncdenr.gov. Thank you for your continued cooperation with this matter.

Sincerely,



Jaclynne Drummond
Compliance Hydrogeologist
Solid Waste Section, Division of Waste Management
NCDENR

cc sent via email: David Pepper, Waste Industries USA, Inc.
 Jason Watkins, Field Operations Branch Head
 Deb Aja, Western District Supervisor
 Hugh Jernigan, Environmental Senior Specialist
 Pat Backus, Permitting Branch Engineer
 Dusty Reedy, Golder Associates NC, Inc.