

From: Sugg, William P
To: ["jpfohl@mesco.com"](mailto:jpfohl@mesco.com)
Cc: [Ritter, Christine](#)
Subject: SWS Comments: Iredell County Landfill (49-03) LFG As-Built Plan
Date: Wednesday, November 19, 2014 4:41:00 PM

Jonathan,

I've completed my review of the draft *Landfill Gas Monitoring Plan "As-Built" for Iredell County Landfills* submitted November 17, 2014 via email to Perry Sugg (SWS Hydrogeologist). The site is comprised of active and inactive lined MSWLFs, as well as a closed unlined C&D landfill. Monitoring includes targeted gases methane, O₂, and CO₂, as well as LEL measurements.

Mostly the plan is fine, but we're requesting hydrogen sulfide monitoring around the closed C&D landfill be added, as explained below.

Prior to final approval of this plan, the following revisions are requested:

- The plan as submitted needs to be amended to also include hydrogen sulfide gas (H₂S) monitoring in the vicinity of the closed C&D landfill. C&D landfills are a source of this gas due to the nature of material disposed in them. Please add H₂S monitoring for the following wells and buildings: MP-21; MP-22; SWAP SHOP; GARAGE 1; and LFGE OFFICE.
- Section 1.3 Regulatory Limits: add action limits for hydrogen sulfide (5% by volume for 100 LEL and 1% by volume for 25% LEL, respectively)
- Section 2.1.1 LF Gas Probe Locations (pg 5): note in paragraph discussing the C&D landfill that H₂S will be monitored around the C&D landfill.
- Section 2.2 Structure Monitoring: Note the three structures that will also be monitored for H₂S.
- Section 3.1 Equipment: Include equipment and/or method for H₂S measurements, if different than what's listed.
- Section 5 Contingency Plan: Include note on remedial measures should H₂S readings be detected above regulatory limits at facility boundary where monitoring for H₂S.
- LFG Monitoring Data Form: Include column for H₂S measurements for the locations specified above.

Once the revisions have been made, you can send the final As-Built Monitoring Plan via email and I will follow with official letter of approval. If you have any questions or would care to discuss further, please feel free to contact me at (919) 707.8258. Thank you.

Perry Sugg, PG
Permitting Hydrogeologist

NC Department of Environment & Natural Resources
Division of Waste Management – Solid Waste Section
Phone: (919) 707.8258
Physical Address: 217 West Jones St / Raleigh, NC / 27603
Mailing Address: 1646 Mail Service Center / Raleigh, NC / 27699-1646
<http://portal.ncdenr.org/web/wm/sw>

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