

August 10, 2015

Ms. Jaclynne Drummond
NCDENR Division of Waste Management
Asheville Regional Office
2090 U.S. Highway 70
Swannanoa, North Carolina 28778
Address 2

**RE: Leachate Release Response Plan
Deep Run Transfer Station
Kinston, North Carolina**

Dear Ms. Drummond:

As you know, leachate was released from the tank at the Deep Run Transfer station in Kinston, NC on July 23rd at approximately 3:30 pm. The incident was reported to your office verbally, and on July 27th you submitted a letter to Mr. Mike Donovan of Waste Industries summarizing the requirements for a leachate release investigation. These requirements include:

- Preparation and submittal of a sampling plan which shall address potential soil and surface water impacts;
- Following approval, implementation of the plan within seven days; and
- Preparation of a report comparing the results to applicable standards within 10 days of receipt of analytical data.

To meet these requirements, Smith Gardner, Inc. (S+G) will perform the following scope of work.

Sampling Plan

Soil Sample Collection and Analysis

S+G personnel will mobilize to the site to collect soil samples from the flow path of the leachate release. The flow path is shown on the attached **Figure 1**. To evaluate soil quality within the flow path, S+G proposes to collect two discreet grab samples; one sample will be collected near the source of the release, and the second sample will be collected closer to the discharge point into Horse Branch Creek. Due to the naturally occurring presence of inorganic metals in the soils of North Carolina, S+G will also collect a background sample upgradient and away from the leachate flow path. Background sample results will be compared with samples collected in the flow path, to evaluate the concentrations of naturally occurring constituents. The proposed sampling locations are shown on **Figure 1**.

Each sample will be collected from a depth between one (1) and two (2) feet below grade. Samples will be analyzed for the Appendix I list of constituents (40 CFR 258 Appendix I) by a North Carolina certified laboratory.

Surface Water Sampling and Analysis

Surface water samples will be collected from Horse Branch Creek, upgradient and downgradient of where the leachate entered the creek. These sampling locations are shown on **Figure 1**.

The samples will be analyzed by a North Carolina certified laboratory for Appendix I constituents (40 CFR 258 Appendix I).

Reporting

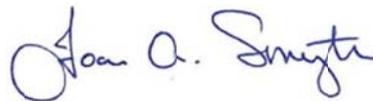
Within 10 business days of receiving the laboratory analytical data, S+G will submit a report to NCDENR summarizing sample collection techniques and laboratory analytical data results. Analytical data will be compared to site background conditions (Upgradient soil and surface water sample analysis) and relevant standards (NC 2B surface water standards, and NC Soil Preliminary Soil Remediation Goals). This report will also include a map of sampling locations, conclusions and recommendations.

S+G appreciates your timely review of this leachate release response plan and we are prepared to implement it following approval. If you have any questions or require additional information, please contact us at 919-828-0577 or by email below.

Sincerely,
SMITH GARDNER, INC.



Madeline M. German, P.G.
Project Geologist
madeline@smithgardnerinc.com



Joan A. Smyth, P.G.
Senior Hydrogeologist
joan@smithgardnerinc.com

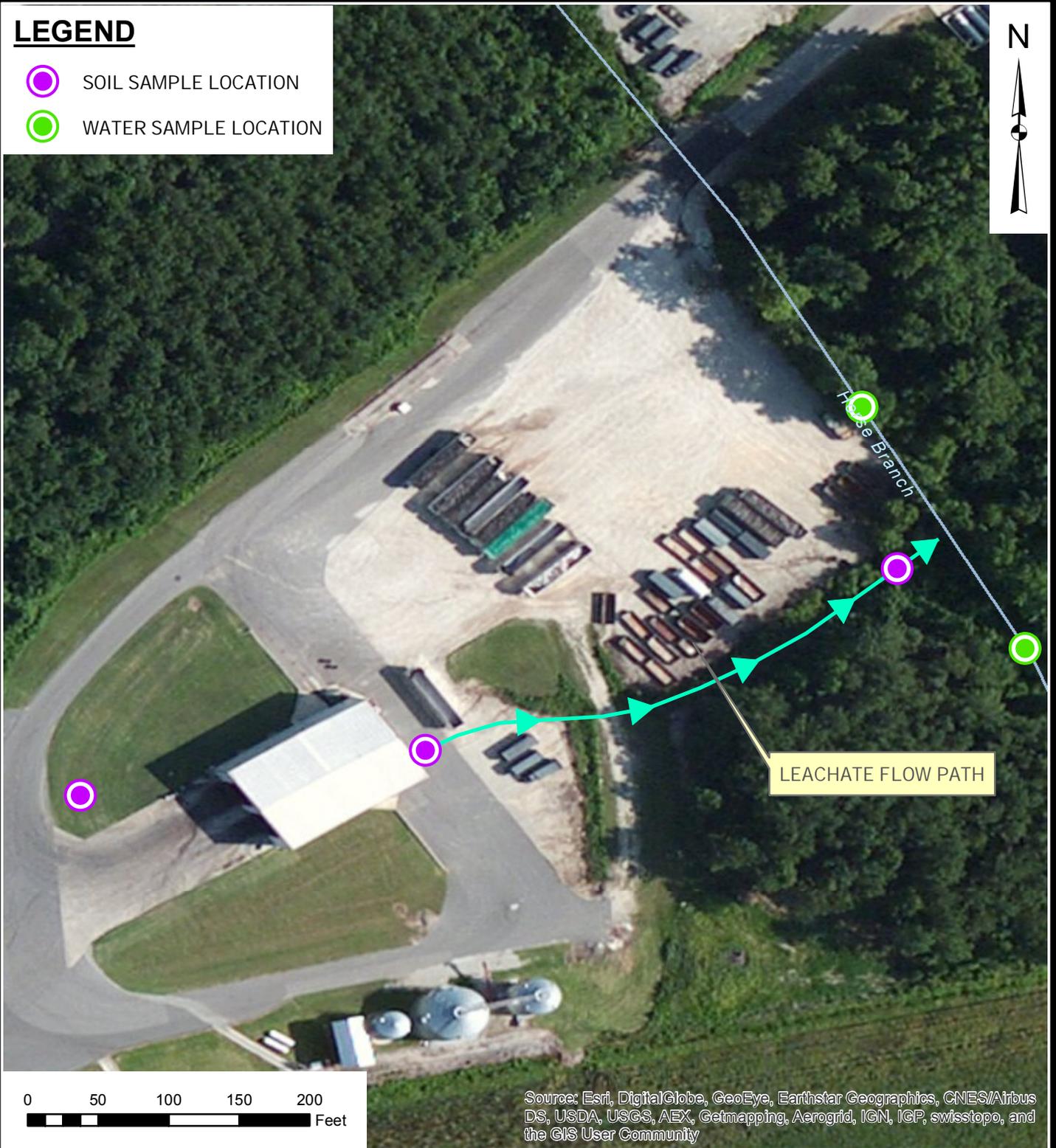
Attachment - Figure 1

cc: Mike Donovan – Waste Industries USA, Inc.

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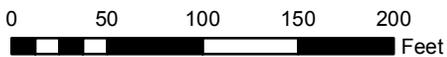
LEGEND

- SOIL SAMPLE LOCATION
- WATER SAMPLE LOCATION



LEACHATE FLOW PATH

Horse Branch



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

LEACHATE FLOW PATH AND SAMPLE COLLECTION LOCATIONS WI DEEP RUN TRANSFER STATION KINSTON, NORTH CAROLINA

NC LIC. NO. C-0828 (ENGINEERING)

SMITH + GARDNER

14 N. Boylan Avenue, Raleigh NC 27603 | 919.828.0577

DRAWN: C.T.J.	APPROVED: J.A.S.	SCALE: AS SHOWN	DATE: Aug. 2015	PROJECT NO.: KINSTON 15-1	FIGURE NO.: 1
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