

N.C. DEPARTMENT OF ENVIRONMENT, HEALTH AND NATURAL RESOURCES
DIVISION OF SOLID WASTE
HAZARDOUS WASTE SECTION

Circle one:
G, I, P, GW, C, E

FILE DOCKET

DATE	ITEM
① 5-31-95	Sample Analysis Request
② 6-2-95	Chain of Custody record
③ 6.7.95	GW inspection form
④ 9-19-95	GW monitoring evaluation
⑤ 12-6-95	Revised GW Sampling
⑥ 12-11-95	GW monitoring system
⑦ 1-28-96	meeting Attendance record
⑧ 2-14-96	Response to HWS Correspondence
⑨ 3-6-96	GW Sampling & Analysis report
⑩ 6-2-95	Chain of Custody Record
⑪ 8-4-98	PH meter Readings
⑫ 8-18-00	Post-Closure Care Sampling Modification Request Letter

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August 18, 2000

*Third Creek Monofill
City of Statesville
EPA ID # NCR 000 001 602*

Mr. Larry Stanley
North Carolina Department of Environment and Natural Resources
Division of Solid Waste Management
Hazardous Waste Section
Post Office Box 27687
Raleigh, North Carolina 27611-7687

Reference: Post-Closure Care Sampling Modification Request
Third Creek Monofill Site
City of Statesville
Statesville, North Carolina
EPA ID Number NCR 000 001 602
Aquaterra Job No. 5302100



Dear Mr. Stanley:

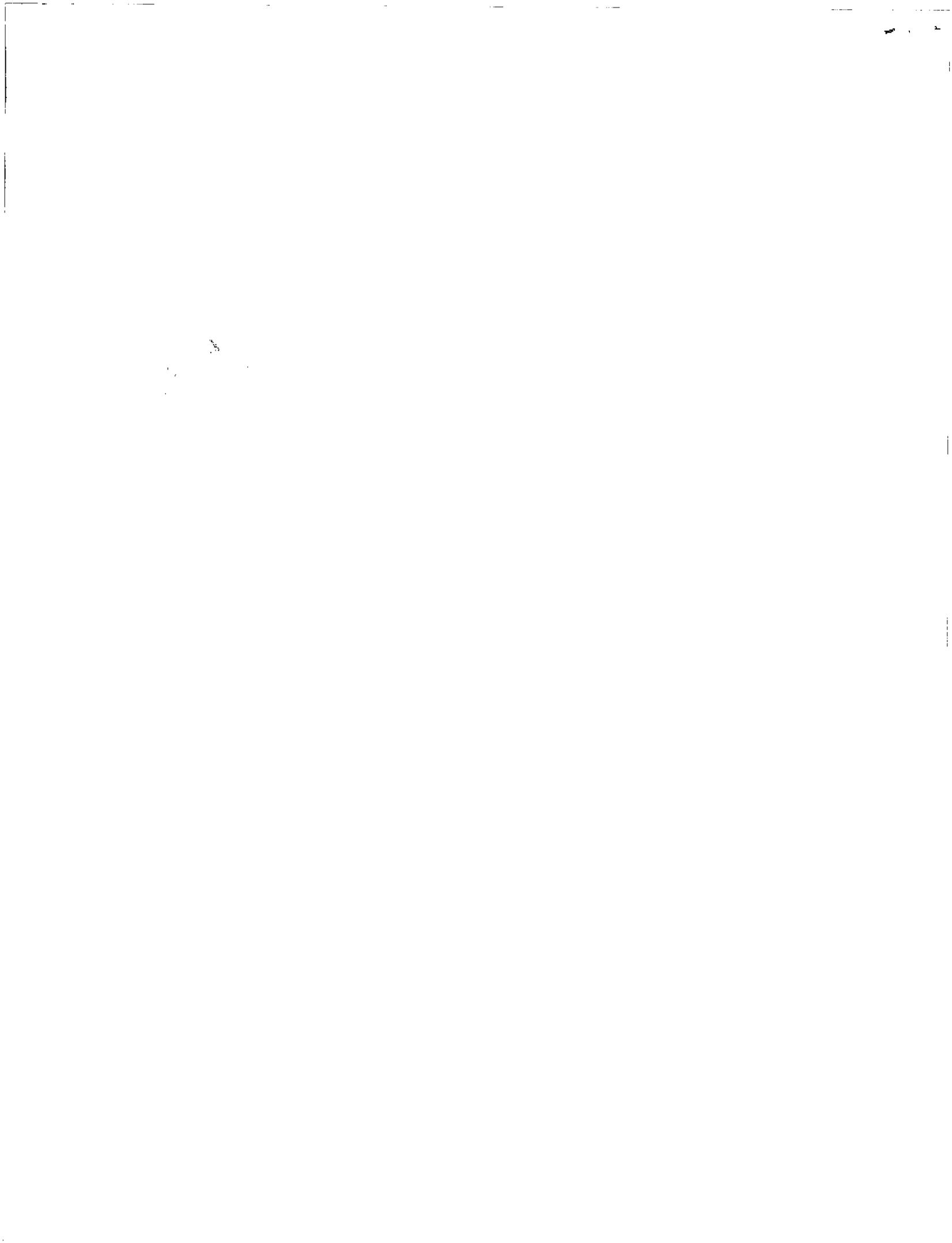
Thank you for meeting with us on April 12, 2000 and listening to our concerns regarding the post-closure care requirements at the Third Creek Monofill located in Statesville, North Carolina. On behalf of the City of Statesville (the City), Aquaterra Engineering, Inc. (Aquaterra) is requesting a revision to the sampling and analysis requirements for the ground water monitoring wells at the Third Creek Monofill. As you may recall, Aquaterra's August 27, 1997 *Closure Certification* detailing the closure activities conducted at the City of Statesville's Third Creek Monofill was accepted by your office in a letter to the City of Statesville dated June 22, 1998.

Previous Ground Water Sampling Results

Aquaterra has conducted extensive ground water monitoring at the site over the past 5 years. The six monitoring wells (MW-2, MW-5 through MW-9) at the site have exhibited no evidence of impact from the previously buried sludge. Volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs) and cadmium have not been identified at levels above the laboratory method detection limits during the sampling events. With the exception of heptachlor which was detected only during the June 27, 1996 sampling event in monitoring wells MW-5 and MW-6, no pesticides or herbicides have been detected. Heptachlor has not been detected in subsequent monitoring events.

Previous Soil and Sludge Sampling Results

The soil and sludge sampling program conducted during the closure of the Monofill trenches also indicated that the excavated sludge and impacted soil were effectively chemically stabilized. Also VOCs and SVOCs were not present in the soils remaining in the excavation. Some laboratory artifacts were present in three of the Trench 18 samples. Bis(2-ethylhexyl)phthalate was present at a concentration of 910 µg/kg (sample T18-F2) and methylene chloride was present at a concentration of 8 µg/kg in sample T18-NW and 11 µg/kg in sample T18-WW. In addition, the metals levels in the soils remaining in the trenches after excavation are relatively consistent with the levels obtained in the background samples.



Revised Sampling and Analysis Plan for Ground Water Sampling

Previous sampling indicates no evidence of a significant increase in any detected parameters throughout the history of sampling and monitoring activity. It is our understanding that federal and state regulations (40 CFR 265 and 15A NCAC 13A .0110) require only the following ongoing detection monitoring:

- semi-annual sampling of monitoring wells MW-2, and MW-5 through MW-9 for the ground water indicator parameters (pH, specific conductance, total organic carbon (TOC) and total organic halides (TOX)) identified in 40 CFR, Subpart F, Section 265.92 (b)(3).
- annual sampling of monitoring wells MW-2, and MW-5 through MW-9 for the ground water quality parameters (chloride, iron, manganese, sodium, and sulfate) identified in 40 CFR, Subpart F, Section 265.92 (b)(2).

The City therefore proposes to modify its *Sampling and Analysis Plan* to include only the foregoing parameters. In addition, as an added precaution, the City is willing to conduct semi-annual sampling for cadmium, the primary contaminant of concern in the sludge disposed of in the monofill. The semi-annual sampling events will be conducted in June and December. The annual sampling event will be conducted in June. Replicate samples will not be collected.

If you are in agreement with these proposed modifications to the sampling and analysis plan, Aquaterra will up-date the *Post-Closure Care Plan* and prepare and submit a *Revised Sampling and Analysis Plan* outlining sample collection and handling methods, and laboratory analytical methods for the Third Creek Monofill Site.

If you require additional information or have any questions, please contact me at (770) 614-3185.

Sincerely,

AQUATERRA ENGINEERING, INC.



Susan Kite, P.G.
Senior Project Manager

pc: Mr. L.F. ("Joe") Hudson-City of Statesville
Ms. Renee Parkman-City of Statesville
Mr. Steven J. Levitas-Brooks, Pierce, McLendon, Humphrey & Leonard, L.L.P.

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