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Director

May 24, 2016

Sent via email: <mailto:ericevans@edgecombeco.com>

Mr. Eric Evans, Manager
Edgecombe County
P.O. Box 10
Tarboro, NC 27886

Re: Interim Corrective Action Evaluation Report
Edgecombe County Landfill, Permit #33-01

Dear Mr. Evans:

The Solid Waste Section (Section) has reviewed the Interim Corrective Action Evaluation Report, Edgecombe County Landfill (DIN 26085) submitted on behalf of Edgecombe County by S&ME, Inc. The Section approved a corrective action plan (CAP) (DIN 9206) for the Edgecombe County Landfill on January 16, 2009 and a subsequent CAP amendment (DIN 11254) was approved on August 9, 2010. The remedial strategies chosen for implementation on-site include in situ isolation of surface water, in situ isolation of groundwater, and monitored natural attenuation (MNA). In situ isolation of surface water was proposed to be completed by maintaining a consistent contour with the pre-1998 waste area and increasing the slope of the closed MSW area. In situ isolation of groundwater was proposed to be completed by installing an upgradient groundwater hydraulic barrier wall along the southern waste boundary.

To date, maintaining a consistent contour with the pre-1998 waste area and increasing the slope of the closed MSW area have been completed. MNA monitoring was conducted to assess baseline conditions from 2010 until 2012 at which time, the Section approved Edgecombe County's request to suspend MNA monitoring until the upgradient barrier wall was constructed. S&ME has proposed to resume MNA monitoring in accordance with the previously approved revised sampling and analysis plan beginning in June 2016.

In situ isolation of groundwater using an upgradient barrier wall is the only remedial strategy that has not been implemented. The barrier wall was proposed to be installed along the upgradient boundary of the landfill for the purpose of diverting the flow of groundwater prior to contact with waste. The diversion of upgradient groundwater flow is intended to reduce the volume of water contributing to leachate generation and lower groundwater levels thereby increasing the vertical separation between the groundwater table and bottom of waste. S&ME included a revised construction schedule for the upgradient barrier wall in the Corrective Action Evaluation Report (CAER) with a projected start date of May 2017 and completion in December 2017. The Section approves the resumption of MNA monitoring and the proposed upgradient barrier wall construction schedule detailed in the CAER.

Edgecombe County should proceed with MNA monitoring and construction of the upgradient barrier wall as outlined in the CAER. Edgecombe County shall notify the Section of any circumstances that would delay the upgradient barrier wall construction. Failure to notify the Section and/or adhere to the construction schedule outlined in the CAER would put Edgecombe County in violation of Rule 15A NCAC 13B .1637 (2) and may subject the County to enforcement actions.

Please contact me at (919) 707-8288 or by e-mail at ervin.lane@ncdenr.gov if you have any questions or concerns regarding this letter. Thank you in advance for your anticipated cooperation in this matter.

Sincerely,

Ervin Lane
Compliance Hydrogeologist
Solid Waste Section

cc: Sam Watts, P.G., S&ME, Inc.
Jason Watkins, Field Operations Branch Head – SWS
Ed Mussler, P.E., Permitting Branch Head – SWS
Ming-Tai Chao, P.E., Permitting Engineer – SWS
Sarah Rice, Compliance Officer – SWS
Christine Ritter, Hydrogeologist – SWS