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Governor

DONALD R. VAN DER VAART
Secretary

MICHAEL SCOTT
Director

August 12, 2016

Sent via email to tim.rogers@waynegov.com

Mr. Tim Rogers
Solid Waste Director
460 B South Landfill Road
Dudley, NC 28333

Re: June 2016 Water Quality Monitoring Plan and
Assessment Monitoring Plan for the
Wayne County MSW lined landfill
DIN 26620

Dear Mr. Rogers:

A Water Quality Monitoring Plan (WQMP) for the Wayne County MSW lined landfill (9606-MSWLF) was recently submitted by your consultant, Municipal Engineering, and reviewed in support of the permit application for continued operations at the Wayne County MSW lined landfill. While the NC Solid Waste Section had issued approval of the WQMP in advance of approval of your permit application and prior to permit issuance, language in the WQMP for the lined landfill regarding assessment monitoring at the facility has since been determined insufficient to address potential releases from the MSWLF. In accordance with 15A NCAC 13B .1634 (a), "Assessment monitoring is required whenever one or more of the constituents listed in Appendix I is detected in exceedance of the ground-water protection standards."

Benzene was detected above NC 2L groundwater standards during both the August 2015 and the February 2016 semi-annual monitoring events at the landfill. These exceedances trigger assessment monitoring at the Wayne County MSWLF. In accordance with 15A NCAC 13B .1634 (b), "Within 90 days of triggering an assessment monitoring program, and annually thereafter, the owner or operator shall sample and analyze the ground water for all constituents identified in Appendix II of 40 CFR Part 258.

The NC Solid Waste Section is requiring Wayne County to collect groundwater samples from every groundwater monitoring well at the lined MSWLF and analyze all groundwater samples for the full suite of Appendix II constituents during the next scheduled semi-annual sampling event in order to characterize the origin, nature, and extent of the release at the landfill. After the results from the Appendix II sampling event are reviewed, a determination will be made regarding the frequency and number of wells where Appendix II will be required at future sampling events. In addition, pursuant to 15A NCAC 13B .1634(b), "For any constituent detected in the downgradient wells as the result of the Appendix II analysis, a minimum of four independent samples from each well (background and downgradient) shall be collected and analyzed to establish background for the new constituents."

Please revise the language contained in the June 2016 WQMP to reflect the requested sampling requirements. In accordance with 15A NCAC 13B .1634(f), "If one or more Appendix II constituents are detected above the approved ground-water protection standards in any sampling event, the owner or operator, shall within 14 days of this finding, submit a report to the Division, place a notice in the operating record, and notify local government officials. Wayne County will then be required to submit an Assessment Monitoring Plan pursuant to 15A NCAC 13B .1634(f)(1).

If you have any questions or concerns, you may contact Christine Ritter at (919) 707-8254 or Jackie Drummond at (828) 296-4706. Thank you for your anticipated cooperation with this matter.

Sincerely,



Christine Ritter
Permitting Hydrogeologist
NC Solid Waste Section

Cc: Steven Gandy, P.E., MESCO
Jonathan Pfohl, MESCO
Ellen Lorscheider, Chief, NC Solid Waste Section
Ed Mussler, P.E., Permitting Branch Supervisor, NC SWS
Jason Watkins, Field Operations Branch Supervisor, NC SWS
Jackie Drummond, Compliance Hydrogeologist, NC SWS
Ming Chao, P.E., Permitting Engineer, NC SWS
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