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April 27, 2016

Sent Via Email – [jv.potter@watgov.org](mailto:jv.potter@watgov.org)

Mr. J.V. Potter  
Watauga County Operations Services Director  
336 Landfill Road  
Boone, NC 28607

Re: Soil Sampling and Analysis Report  
Watauga County Transfer Station, Permit #95-03T  
DIN #26006

Dear Mr. Potter:

The Solid Waste Section (Section) has reviewed the *Response to NCDEQ Compliance Inspection Report and Notice of Violation, dated November 20, 2015 & Sampling and Analysis Report (DIN #25970)* prepared by Draper Aden Associates (DAA). During the November 10, 2015 compliance inspection at the facility, Section personnel observed a release of liquid from the disposal trailers onto the asphalt staging area that flowed toward a vegetated area adjacent to the parking lot. The leachate release observed during the inspection resulted in the Section issuing a Notice of Violation (NOV) to Watauga County on November 20, 2015. The NOV required Watauga County to conduct an assessment and investigate potential leachate impact. DAA submitted a sampling and analysis plan that was approved by the Section on December 28, 2015.

DAA personnel conducted soil sampling at the facility on January 7, 2016. Seven soil samples (WS-1 through WS-7) were collected from the area of investigation which included locations along the edge of the parking lot, along secondary flow paths within the vegetative area, and an area further downgradient from the release to define the extent of potential impact. A background soil sample was also collected south of the area of investigation. Soil samples were collected with a hand auger at depths between 1 to 6 inches below ground surface. The samples were field screened using a PID and transported to a laboratory for analysis of Appendix I metals and volatile organic compounds, biological oxygen demand (BOD), chemical oxygen demand (COD), and total Phosphorus.

Soil sample analytical results were compared to the Residential and Protection of Groundwater Preliminary Soil Remediation Goals (PSRG). Acetone was the only organic constituent reported above laboratory reporting limits, but the reported concentration did not exceed the Residential or Protection of Groundwater PSRG. Arsenic and thallium concentrations were reported above the Residential PSRG in samples WS-1 through WS-7. Additionally, cobalt and vanadium concentrations exceeded the Protection of Groundwater PSRG in samples WS-1 through WS-7. The arsenic and thallium Residential PSRG in addition to the cobalt and vanadium Protection of Groundwater PSRG were also exceeded in the background soil sample. Therefore, DAA attributed the exceedances of cobalt, vanadium, arsenic, and thallium in samples WS-1 through WS-7 to natural occurrence. BOD and COD were not detected in any of the samples. Based on the sampling and analysis results, DAA concluded there was no indication of leachate impact to soils and recommended that no further action be required at this time.

Based on the analytical data presented in the report, the Section will not require additional assessment related to the leachate discharge observed on November 10, 2015. Please contact me at (919) 707-8288 or by e-mail at [ervin.lane@ncdenr.gov](mailto:ervin.lane@ncdenr.gov) if you have any questions or concerns regarding this letter. Thank you for your cooperation with this matter.

Sincerely,

Ervin Lane  
Hydrogeologist  
Environmental Compliance  
Solid Waste Section

cc: Karen Weber, P.G., Draper Aden Associates  
Jason Watkins, Field Operations Branch Head  
Deb Aja, Western District Supervisor  
Charles Gerstell, Environmental Senior Specialist