



North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor  
Dee Freeman, Secretary

July 15, 2010

Sent Via U.S. Mail and Via Email - [jmitchell@alexandercountync.gov](mailto:jmitchell@alexandercountync.gov)

Mr. Josh Mitchell  
Alexander County Solid Waste  
621 Liledoun Road  
Box 12  
Taylorsville, NC 28681

**Re: WARNING NOTICE  
Environmental Monitoring Reporting Deficiencies  
Alexander County Landfill, Permit #02-01**

Dear Mr. Mitchell:

The Solid Waste Section has completed a review of the *Semiannual Water Quality Monitoring Report December 2009* dated February 11, 2010 (Doc ID 9870) submitted by Municipal Engineering Services Company, P.A. on behalf of Alexander County. Based upon this review, the Solid Waste Section has found deficiencies in your environmental monitoring reporting that has failed to meet the following requirements: reporting all constituent concentrations at or below the designated Solid Waste Section Limits (SWSLs) and submitting the EDD with all analytical data including the MNA parameters.

On October 27, 2006 the North Carolina Solid Waste Section issued a memorandum titled *New Guidelines for Electronic Submittal of Environmental Monitoring Data*. Two additional memoranda were also issued by the North Carolina Solid Waste Section regarding environmental monitoring, the February 23, 2007 memorandum titled *Addendum to October 27, 2006, North Carolina Solid Waste Section Memorandum Regarding New Guidelines for Electronic Submittal of Environmental Data* and the October 17, 2007 memorandum titled *Environmental Monitoring Data for North Carolina Solid Waste Management Facilities*. All three memoranda have been available on our webpage for over three years ([http://www.wastenotnc.org/swhome/enviro\\_monitoring.asp](http://www.wastenotnc.org/swhome/enviro_monitoring.asp)). The EDD template is also located on our webpage at <http://portal.ncdenr.org/web/wm/sw/envmonitoring>. The EDD template standardizes the environmental reporting process, eliminates the need for laboratories to submit paper copies of analytical results to the Solid Waste Section, reduces the labor intensive data entry by Solid Waste Section, improves efficiency, and ensures consistency of stored data.

In addition, the February 23, 2007 memorandum titled *Addendum to October 27, 2006, North Carolina Solid Waste Section Memorandum Regarding New Guidelines for Electronic Submittal of Environmental Data*, stated, "Analytical data from laboratories that cannot meet the new reporting limits will not be accepted," and "Failure to comply with the requirements described in the October 27, 2006, memorandum and this addendum to the October 27, 2006, memorandum will constitute a violation of 15A NCAC 13B .0601, .0602, or .1632(b), and submittal of unacceptable data may lead to enforcement action."

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As a result, it is the County's responsibility to ensure that all environmental monitoring results are reported as required by the Solid Waste Section. For all future water quality sampling events, please submit all laboratory analytical data in a format consistent with the EDD template established by the Solid Waste Section and report all constituent concentrations at or below the SWSLs. Failure to comply may lead to enforcement action.

In addition, based upon a file review of the historical water quality monitoring reports for this facility, it appears that Appendix II water quality monitoring was discontinued without Solid Waste Section approval. The last water quality monitoring event that analyzed for the two detected Appendix II constituents, alpha-BHC (pesticide) and Silvex (herbicide), was January 2003. The full set of Appendix II parameters was analyzed only for the newly installed groundwater monitoring wells MW-16, MW-24, and MW-26 in April 2008. It appears that no routine Appendix II water quality monitoring has been conducted consistently since 2003. Within 10 days of receipt of this letter, please provide the Solid Waste Section with documentation establishing an approved variance or documentation of Appendix II water quality monitoring as required by 15A NCAC 13B .1634.

Finally, the *Semiannual Water Quality Monitoring Report December 2009* dated February 11, 2010 and previous water quality monitoring reports for this facility are in violation of N.C.G.S. §89E, the North Carolina Geologists Licensing Act. All drawings, reports, or other geologic papers or documents involving geologic work must be signed and sealed by a qualified geologist who is licensed to practice in the State of North Carolina.

If you have any questions or concerns regarding this letter, please contact me at 919-508-8500 or at [jaclynne.drummond@ncdenr.gov](mailto:jaclynne.drummond@ncdenr.gov). Thank you for your anticipated cooperation with this matter.

Sincerely,



Jaclynne Drummond  
Hydrogeologist  
Environmental Compliance  
Solid Waste Section

cc via electronic mail: Jonathan Pfohl Municipal Engineering ([jpfohl@mesco.com](mailto:jpfohl@mesco.com))  
Bonnie McKee, Pace Analytical ([bonnie.mckee@pacelabs.com](mailto:bonnie.mckee@pacelabs.com))  
Mark Poindexter, Field Operations Supervisor  
Deb Aja, Western District Supervisor  
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Solid Waste Section Central Files