



North Carolina Department of Environment and Natural Resources

Division of Waste Management

Dexter R. Matthews

Director

Beverly Eaves Perdue
Governor

Dee Freeman
Secretary

June 18, 2009

Mr. David Jones
Public Works Director
Post Office Box 543
Snow Hill, North Carolina 28580

Subject: Draft Text for Corrective Action Plan
Greene County Landfill
Construction and Demolition Landfill Permit 40-02,
Doc ID 7536

Dear Mr. Jones:

The Solid Waste Section (SWS) reviewed the draft text (draft report) of the third revised Corrective Action Plan (CAP) for the Greene County Landfill. Municipal Engineering Services Company, P.A. (MESCO) submitted the draft report with its response letter, dated May 13, 2009 (Doc ID 7358), to the SWS's second technical review (Doc ID 7138). The CAP presented in the draft report replaces the CAP revised on February 25 2009 in which a remedy not presented to the public had been proposed. The current remedy has been presented in a public meeting.

Although the draft report is not approved, the SWS approves the selected remedy—Monitored Natural Attenuation (MNA)—for groundwater contamination described in the Assessment of Corrective Measures (ACM), dated August 2007. Groundwater contamination is reportedly within the SWS's relevant point of compliance. Revision of the draft report is required. More characterization of the contamination plume is necessary, and more information about financial assurance is needed. Specific revisions are listed below. The numbers correspond to the numbered sections in the draft report.

- 1.3 Include lead, iron, and cis-1,2-dichloroethene as constituents of concern (COC's). Lead is reported in both the ACM and CAP as "statistically significant". It is historically detected above the state groundwater quality standard in four out of six wells proposed for MNA—background well, MW-1R; compliance wells, MW-6 and MW-7; and MW-4 in the plume. Pursuant to 15A NCAC 13B .1634, lead is also identified in Appendices I and II as a constituent to be assessed. Iron is detected in MW-4 and MW-5 at more than 20 times levels detected in background and adjacent wells; therefore, appears more indicative of onsite contamination than "natural" occurrence. Sampling reports for March 2007, September 2007, and March 2008 show iron detected above the state groundwater standard. Iron is also a MNA parameter. Cis-1,2-dichloroethene is listed as a COC in the ACM and is reportedly the COC modeled for the CAP. Compliance with "the 1600 Rules" and "the 500

Rules” referred to in the response letter do not preclude compliance with state groundwater quality standards specified in 15A NCAC 2L .0202.

- 1.4 Two revisions are necessary. One, see comment for 1.3. Two, reconcile opposing groundwater flow directions at MW-6. In the ACM, MW-6 is downgradient of the plume; whereas, in sampling reports, it is upgradient. Provide a “site conception model” showing consistent relationship between the wells and plume.
- 2.1 See comment 1.3.
- 2.5.2 Delete the sentence in which lead and iron are reported to not be COC’s.
- 6.2 Attach to the CAP documentation from the “Transition Plan” referenced here and in Section 2.3 in which the “Explosive Gas Control Plan” is described. Include a map of sampling points, detail of the gas vents, etc.
- 8.0 Show the total cost for the years during which corrective action is in effect. More information about financial assurance is at the end of this letter.

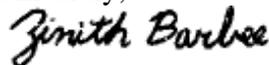
Plates

Plate 3 Show location of the relevant point of compliance.

To date the SWS has not received a revised financial assurance mechanism that includes a cost for corrective action. The SWS received a letter from the chief financial officer of Greene County, dated March 27, 2009 showing financial assurance for the costs of closure and post-closure but not for the cost of corrective action. Also, please note that in Regulation 15A NCAC 13B .1628 (d)(1)(A) is the specification that the cost estimate be adjusted for inflation. A revised financial assurance mechanism including a cost estimate for the CAP should be sent to Ms. Shawn McKee in the SWS. She can be contacted at 919-508-8512 or at: shawn.mckee@ncdenr.gov.

The revised CAP should be submitted within 30 days of the receipt of this letter. If you have questions, please contact me at 919-508-8401 or at: zinith.barbee@ncdenr.gov.

Sincerely,



Zinith Barbee
Project Manager
Solid Waste Section

cc: Mark Poindexter	Field Operations Supervisor
Ed Mussler	Solid Waste Section
Pat Backus	SWS
Shawn McKee	SWS
Sean Patrick	Municipal Engineering Services Co., P.A.
Central Fill	