



North Carolina Department of Environment and Natural Resources

Division of Waste Management

Dexter R. Matthews

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October 29, 2010

Mr. David Jones
Public Works Director
P. O. Box 543
130 S. Queen Street
Snow Hill, North Carolina 28580

Subject: Corrective Action Plan
Greene County Landfill
Construction and Demolition (C&D) Landfill Over Municipal Solid Waste (MSW)
Permit 40-02
Doc ID 12000

Dear Mr. Jones:

Following review of semi-annual sampling results for the Corrective Action Plan (CAP), the Solid Waste Section (SWS) determined that Greene County Landfill discontinued Appendix II monitoring without approval and is not sampling all wells and stations listed in the CAP. The SWS also reviewed a permit application, which references the CAP. Municipal Engineering Services Company, Inc (MESCO) submitted the CAP.

To date the SWS received one report for semi-annual sampling for the CAP. The report is dated August 10, 2010 (Doc ID 11337) for sampling one month after approval of the CAP. The SWS approved the CAP (Doc ID's 9670 and 9671) on February 16, 2010. In the report only results for Appendix I constituents are submitted. The CAP should be implemented in accordance with Regulation 15A NCAC 13B .1637. Corrective actions described in the CAP are selected remedies for groundwater contamination described in the ACM (Doc ID 8776). Remedies presented in the ACM should be in accordance with Regulations 15A NCAC 13B .1635 and 1636. In all the aforementioned regulations, monitoring for Appendix II constituents is specified.

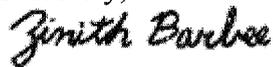
The SWS also determined that Greene County Landfill did not sample all groundwater monitoring wells and surfacewater sampling stations specified in the CAP. In the semi-annual report, entitled, "Monitored Natural Attenuation Semi-Annual Sampling" (Doc ID 11337) only MW-1R and MW-4 are listed. In the CAP, six (6) groundwater monitoring wells and two (2) surfacewater sampling stations are identified. See Appendix B, entitled "Groundwater and Surface Water Sampling and Analysis Plan". Included in the appendix is Table E-1, on which the wells and stations are listed. The wells are also itemized as part of the cost for the CAP. See

Section 8.0 entitled, "Financial Assurance Requirements". All aforementioned corrections in sampling and reporting should be shown in subsequent semi-annual sampling events.

The SWS reviewed a permit application for the Green County Landfill C&D Over MSW in accordance with Regulation 15A NCAC 13B .0547(4). The regulation addresses the CAP. Included in that review (Doc ID 10988) is comment on Greene County Landfill's proposal to increase landfill capacity. With increased capacity is potential for a larger source of contamination. Controlling sources of contaminants is specified in the CAP. See Section 2.3 entitled, "Source Control Measures" and Appendix C, entitled "Explosive Gas Control Plan For Greene County." In these sections, reliance on a "passive horizontal gas venting system around the perimeter of the landfill" is identified as a measure to control contamination at the source. The existing "gas venting system" along the landfill perimeter appears to be a Landfill Gas Monitoring Plan. Please note that landfill monitoring gas plans are now separately reviewed by the SWS hydrogeologists and some standards for landfill gas monitoring have changed. Because landfill gas monitoring is included in the CAP, possible changes to the monitoring plan should be considered when evaluating adequacy of the CAP after substantial modifications at the landfill.

All corrections in sampling and reporting should be reflected in subsequent semi-annual sampling reports. Substantial modifications in the landfill may require a revised CAP. If you have questions, please contact me at 919-508-8401 or zinith.barbee@ncdenr.gov.

Sincerely,



Zinith Barbee
Project Manager
Solid Waste Section

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