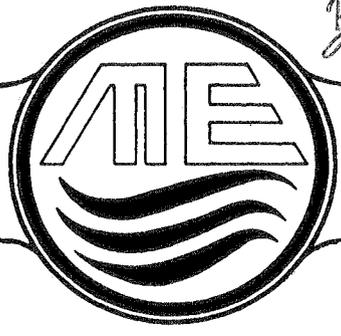


OPERATION/CONSTRUCTION MANAGERS

CIVIL/SANITARY ENGINEERS

**Municipal
Services**



**Engineering
Company, P.A.**

November 4, 2010

Mr. Zinith Barbee
Solid Waste Section
Division of Waste Management
North Carolina Department of Environment and Natural Resources
401 Oberlin Road, Suite 150
Raleigh, NC 27605

Re: Response to Document 12000
Greene County Construction and Demolition (C&D) Landfill Over Municipal Solid Waste (MSW)
Landfill
Walstonburg, NC 27888
Permit No. 40-02
MESCO Project No. G07061.0

Dear Mr. Barbee:

Municipal Engineering Services Company, P.A. (MESCO) on behalf of Greene County, provides the following responses to your October 29, 2010 letter (Doc ID 12000) regarding the Greene County Corrective Action Plan (CAP), approved February 16, 2010.

Your initial paragraph stated "Following a review of semi-annual sampling results for the Corrective Action Plan (CAP), the Solid Waste Section determined that Greene County Landfill discontinued Appendix II monitoring without approval, and is not sampling all wells and stations listed in the CAP." Appendix II monitoring was instituted during the September 2010 sampling event and will be conducted annually in accordance with 15A NCAC 13B .1634. Environment 1 (E1) conducts the sampling and works directly for the county. MESCO will contact E1 and the County to emphasize the requirements of the CAP.

In paragraph two, referenced Solid Waste Section document Doc ID11337 is a MNA update, not a semi-annual groundwater sampling report. The MNA update does not contain complete semi-annual sampling results, only a relevant data summary regarding the immediate actions. A semi-annual sampling report for the Greene County C&D over MSW was submitted to the Compliance Section on August 9, 2010. The March 2010 event samples were collected from six monitoring wells (MW-1R, MW-4, MW-5, MW-6, MW-7 and MW-8) and two surface water points (Downstream and Upstream). Extensive historic data is available for monitoring locations across the facility.

As stated in our semi-annual reports, MESCO previously submitted MNA updates, separately from the semi-annual reports. It was our position that MNA updates were a supplemental brief, submitted semi-annually, intended to keep the SWS current on MNA and/or remediation progress and results. However, per a meeting with the SWS representatives on October 18, 2010, MNA data will now be included with the semi-annual sampling report.

Regarding paragraph four and the previously submitted proposal to increase landfill capacity; MESCO has responded to permit comments from the State (Doc ID 11691) and has modified their proposal accordingly. Updates to the CAP will be conducted as necessary based on facility conditions.

MESCO regrets that submitting independent MNA updates created additional confusion and hopes including this information in the semi-annual sampling reports will help alleviate further misunderstandings. Updates to the CAP will be conducted as necessary based on facility conditions. Please contact us by phone at (919) 772-5393 or by email at mgerman@mesco.com or mbrown@mesco.com with questions or comments.

Sincerely,
MUNICIPAL ENGINEERING SERVICES CO., P.A.



Madeline German
Geoscientist



Mark Brown, LG, PG
Senior Professional Geologist
NC License #1711

Enclosures

cc: Mr. David Jones, Greene County Public Works Director
Mr. Wayne Sullivan, MESCO

North Carolina
Department of Environment and Natural Resources



Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary
Dexter R. Matthews, Director

February 21, 2002

Mr. John Sugg
Lenoir County Solid Waste Director
Courthouse, Box 3289
Kinston, North Carolina 28501

Re: Adjustments to Water Quality Monitoring Requirements - Lenoir County Closed Landfill
(Permit # 54-03)

Dear Mr. Sugg:

Municipal Engineering Services Company, P.A. (MESCO) on behalf of Lenoir County has requested a variance in the groundwater monitoring program at the above referenced landfill. Specifically, a request was made to: (1) substitute wells MW-11 and MW-12 for MW-8 and MW-10 respectively as part of the compliance monitoring network; and (2) change the monitoring status for the entire landfill from assessment monitoring back to detection monitoring.

Monitoring Well Substitution

The Solid Waste Section approves the substitution of wells MW-11 and MW-12 for wells MW-8 and MW-10. Monitoring wells MW-8 and MW-10 will not have to be sampled semiannually. However both wells must be maintained in the event conditions change and sampling must be resumed.

Change in Monitoring Status

Previously, approval was given to remove monitoring wells MW-1, MW-3, MW-6, and MW-9 from Appendix II sampling requirements. Currently wells MW-4, MW-8, MW-10, MW-11, and MW-12 remain in assessment monitoring. Based on the monitoring data that has been submitted and allowed by 15A NCAC 13B.1634 (e) the Solid Waste Section approves the return of MW-4, MW-11, and MW-12 to detection monitoring for the Appendix I list of parameters.

Although approval was given to allow detection monitoring for MW-3, the August 11, 2001 sampling results will require it to be returned to assessment monitoring because of the detection of 1,1-dichloroethane. Despite the fact that the concentration is less than the groundwater standard, it is statistically greater than the background concentration and must again be sampled for the Appendix II list of parameters. For the entire landfill to be able to return to detection monitoring as requested, it must meet the conditions of Rule 15A NCAC 13B .1634 (e), and

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according to the monitoring data, this has not happened at the Lenoir County Landfill. Consequently, the landfill continues to be in assessment monitoring.

Summary

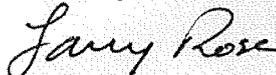
In summary, the Solid Waste Section approves the following changes in the water quality monitoring program at the Lenoir County Landfill:

1. Monitoring wells MW-8 and MW-10 will be removed from sampling requirements;
2. Monitoring wells MW-1, MW-4, MW-6, MW-9, MW-11, and MW-12 will return to a detection monitoring program and be sampled for the Appendix I list of parameters;
3. Monitoring well MW-3 will return to assessment monitoring and be sampled for the Appendix II list of parameters when appropriate.

Approval for these changes is based compliance with Rule .1634 (e). Failure to comply with this rule may result in the return of affected wells to assessment monitoring requirements.

Thank you for your cooperation with this matter. If you have any questions, please call me at (919) 733-0692, extension 257.

Sincerely,



Larry Rose
Environmental Compliance
Solid Waste Section

cc: James Coffey- Chief, Solid Waste Section
Mark Fry - Eastern District Supervisor
John Crowder - Waste Management Specialist
Cheryl Marks - Hydrogeologist