



North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor
Dee Freeman, Secretary

January 22, 2010

Sent Via U.S. Mail and Email

Christopher Thompson, Director
Public Services Department
City of High Point
P.O. Box 230
High Point, NC 27261

Stephen W. Earp, Esq.
Smith Moore Leatherwood
P.O. Box 21927
Greensboro, NC 27420

**Re: City of High Riverdale Drive Landfill, Permit #41-01, and
Former Material Recycling Facility
Plat Maps and Draft Land Use Restrictions**

Dear Mr. Thompson and Mr. Earp:

The Solid Waste Section has reviewed the "Final Plats" for Lot 1 of the City of High Point Riverdale Drive Landfill Lot 1 (Permit #41-01) and Lot 2 of the City of High Point Riverdale Drive Landfill [the former City Material Recycling Facility (MRF) property], both dated June 12, 2009, as well as the e-mail message and accompanying *Draft land use restrictions* sent by Mr. Steve Earp to Ms. Nancy Scott on May 14, 2009. The Solid Waste Section is requesting some additions to the "Final Plats", as outlined below. The Solid Waste Section also requests more information about the City's on-going activities on the landfill property and its current and proposed activities on the former MRF property in order to evaluate current and future uses of the properties in respect to the remedy for the hazardous substance or waste disposal site and maintenance of the closed landfill.

Additions to Plat Maps

Please add the following to the Riverdale Drive Landfill Lot 1 "Final Plat", June 12, 2009:

1. Depict and label the solvent burn pit location and the soil residue mound location.
2. Depict and label the area where the alum sludge has been disposed.
3. Define within the legend the types of wells depicted on the map by the abbreviations PW, OW, and RW; i.e, state what these abbreviations mean.
4. Include a notary public certification under Chris Thompson's name.
5. In the Notary Block, include the text "Owner of Property" after City of High Point.
6. In the Notary Block, move the following sentence to the Notes Section as Number 8 – Questions concerning this matter may be directed to the North Carolina Division of Waste

7. Management, Superfund Section, Inactive Hazardous Sites Branch, 1646 Mail Service Center, Raleigh, NC 27699-1646.
8. In the Notary Block, include personally known to me –“do hereby certify that, _____, is personally known to me and did personally appear and sign”...
9. In the Hazardous Substances table, replace the word “site” with “facility.”
10. In Note Number 1, delete “a contaminated site” and replace with “an inactive hazardous substance or waste disposal site.”
11. Include as Number 9 to the Notes Section “A Declaration of Perpetual Land Use Restrictions is recorded in the Guilford County Register of Deeds Office in Book _____, Page _____.
12. In the Title Block, change title from “Notice of Waste Disposal Site” to “Notice of Inactive Hazardous Substance or Waste Disposal Site.”

Please add the following to the Riverdale Drive Landfill Lot 2 (former MRF facility) “Final Plat”, June 12, 2009:

1. Label the well (W with circle around it) located on the northwest corner of the property.
2. Define within the legend the types of wells depicted on the map by the abbreviations PW, OW, and RW; i.e, state what these abbreviations mean.
3. Include the locations and label the MRF#1 and MRF#2 wells.
4. Include a notary public certification under Chris Thompson’s name.
5. In the Notary Block, include the text “Owner of Property” after City of High Point.
6. In the Notary Block, move the following sentence to the Notes Section as Number 8 – Questions concerning this matter may be directed to the North Carolina Division of Waste Management, Superfund Section, Inactive Hazardous Sites Branch, 1646 Mail Service Center, Raleigh, NC 27699-1646.
7. In the Notary Block, include personally known to me –“do hereby certify that, _____, is personally known to me and did personally appear and sign”...
8. In the Hazardous Substances table, replace the word “site” with “facility.”
9. In Note Number 1, delete “a contaminated site” and replace with “an inactive hazardous substance or waste disposal site.”
10. Include as Number 9 to the Notes Section “A Declaration of Perpetual Land Use Restrictions is recorded in the Guilford County Register of Deeds Office in Book _____, Page _____.
11. In the Title Block, change title from “Notice of Waste Disposal Site” to “Notice of Inactive Hazardous Substance or Waste Disposal Site.”

Lot 1 Riverdale Drive Landfill Current Uses Questions and Requests for Information

1. On a copy of the Lot 1 Plat Map depict the area where the white goods are temporarily stored. What are the dimensions of this area? What is the maximum number or volume of white goods stored at this area at any one time? How long are the white goods temporarily stored? Is the white goods temporary storage area located on top of any area of waste disposal in the closed landfill? Is the white goods temporary storage area lined or paved? Describe the surface of the white goods temporary storage area. Are chlorofluorocarbons removed from the white goods at the temporary storage area?
2. On a copy of the Lot 1 Plat Map depict the area where the empty trailers are stored. What are the dimensions of this area? What is the maximum number of trailers temporarily stored at this area at any one time? How long are the trailers temporarily stored? What are the empty trailers being used for? Is the trailer temporary storage area located on top of any area of waste disposal in the closed landfill? Is the trailer temporary storage area lined or paved? Describe the surface of the trailer temporary storage area.

3. Who approved the disposal of alum sludge from the water treatment plant at the closed landfill, and what was the date of the approval? (Sludge as defined in G.S. 130A-290(a)(34) states: "Sludge" means any solid, semisolid or liquid waste generated from a municipal, commercial, institutional or industrial wastewater treatment plant, water supply treatment plant or air pollution control facility, or any other waste having similar characteristics and effects.) How many cubic yards of alum sludge have been disposed? How much alum sludge is projected to be disposed in future?
4. Provide a laboratory chemical analysis of the water treatment alum sludge.
5. Have the soils adjacent to the disposal of the alum sludge been analyzed for the typical alum sludge constituents: Appendix I Constituents (VOCs and metals); Mercury; Aluminum; Molybdenum; Fluoride; PCBs; Ammonia Nitrogen; Nitrate Nitrogen; Total Kjeldahl Nitrogen; Total Phosphorus; and Potassium?

Lot 2 Riverdale Drive Landfill (Former MRF Property) Current Uses Questions and Request for Information

1. Describe in detail the activities conducted on this property related to "sorting recyclable materials collected from homeowners", including but not limited to the following: a list of the particular types of materials sorted, the maximum amount of materials on site at any one time, how the materials are sorted, how the materials are delivered to the site, how recyclable materials are stored at the site, how recyclable materials are removed from the site, how non-recyclable materials are separated, stored, removed from the site, and where they are disposed. Describe any machinery and equipment at the site utilized in this process.
2. Depict on a copy of the Lot 2 Plat where the sorting of recyclable materials is conducted. Does all of the sorting and storage take place within the building, under roof? What type of floor does the building have? If any of the sorting and storage of recyclable materials is conducted outside the building, is it sorted or stored on pavement, concrete, gravel or soil?
3. Depict on a copy of the Lot 2 Plat the location of the ground asphalt storage. What are the dimensions of the storage area? What is the maximum amount stored at the site? For how long is the ground asphalt stored at the site? How is it used? Is the ground asphalt stored on pavement, concrete or soil? Is it covered?
4. Will the hydrocarbons from the ground asphalt have any effect on runoff, soil contamination, and groundwater contamination?
5. The Solid Waste Section has recently learned from consultant Mr. Gary Babb that "mulch" is also stored on the former MRF property. Depict on a copy of the Lot 2 Plat the location of the mulch storage area. What are the dimensions of the mulch storage area? What is the source of the mulch? What materials were used to produce the mulch? If the content of the mulch includes anything other than virgin wood material, provide a laboratory analysis of the mulch. What is the maximum amount of mulch stored at the site? How long is the mulch stored at the site? What is the mulch used for? Is the mulch stored on pavement, concrete, or soil? Is the mulch covered?
6. Depict on a copy of the Lot 2 Plat the location of the trailer storage area. What is the maximum number of trailers stored at the site? How long are the trailers stored? Are the trailers being stored on pavement, concrete or soil? What are the uses of the trailers?
7. Depict on a copy of the Lot 2 Plat the location of the vehicle parking area? What is the maximum number of vehicles parked on the site? Are vehicles being parked on pavement, concrete, gravel or soil? Who is parking at the former MRF site?

Possible Future Uses of Riverdale Drive Landfill (Lot 1)

Mr. Earp stated in his e-mail message that, although the City has no current plans, the “mining of recyclable materials” was a possible future use of the landfill. Please be advised that mining of recyclable materials from the landfill is unacceptable. The landfill cover is a necessary and integral part of the remediation plan for the inactive hazardous substance or waste disposal site. The landfill cover is to be maintained and not disturbed.

Please contact me if you have any questions regarding this letter at 919-508-8500 or by email at jaclynne.drummond@ncdenr.gov.

Sincerely,



Jaclynne Drummond
Hydrogeologist
Environmental Compliance
Solid Waste Section

cc via email: Nancy Scott, Assistant Attorney General
Kathleen Waylett, Special Deputy Attorney General
Mark Poindexter, Field Operations Supervisor
Gary Babb, Babb & Associates, P.A.
Vance Jackson, Hazardous Waste Section Unit Supervisor