



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

November 15, 2007

Mr. David Scott Bost
City of Greensboro
Environmental Services Department
2503 White Street
Greensboro, NC 27405

Re: Alternate Source Demonstration for Metals and Amendment
White Street Landfill Phase II, Permit #41-03

Dear Mr. Bost:

The Solid Waste Section has reviewed the *October 1, 2006 Alternate Source Demonstration for Metals and the September 20, 2007 Alternate Source Demonstration for Metals Amendment* submitted on behalf of the City of Greensboro by S&ME, Inc. for the White Street Phase II Landfill.

Metals in concentrations exceeding North Carolina Groundwater Standards are being detected at the City of Greensboro's White Street Phase II Landfill, and as a result, an *Alternate Source Demonstration (ASD)* was submitted on October 1, 2006. The metals include barium, cadmium, cobalt, vanadium, zinc, thallium, and nickel. In response, the Solid Waste Section requested additional information in order to justify the conclusions that the landfill is not the source of some of the metals being detected in the groundwater monitoring wells.

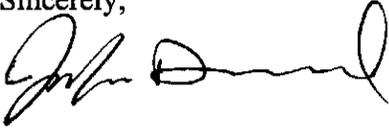
S&ME, Inc. concluded that barium, cadmium, cobalt, vanadium, and zinc may be attributed to the natural occurrence in the soils. The concentrations of these metals are sufficient to influence the concentrations within the groundwater. S&ME, Inc. also concluded that thallium and nickel were detected in the soils; however, the naturally occurring levels of thallium and nickel in the soils are not sufficient to attribute to the high levels detected in certain groundwater samples. Based upon the data submitted, the source of the thallium and nickel appears to be from the landfill, and the source of nickel at well I-5 also appears to be the landfill.

As a result, the *Alternate Source Demonstration for Metals* and the *Alternate Source Demonstration for Metals Amendment* are approved as described. The following metals appear to be naturally occurring at the site: barium, cadmium, cobalt, vanadium, and zinc.

Also, on October 1, 2007, Connel Ware with S&ME, Inc. verbally requested that the Solid Waste Section approve the removal of monitoring well I-5 from the compliance monitoring network. Monitoring well I-5 would be replaced with existing monitoring well II-12 in the compliance monitoring network. The Section Waste Section approves the request for the removal of I-5 from the compliance monitoring network, and II-12 may replace this well becoming the new compliance well. Please record the change in the water quality monitoring plan and submit this amendment to the Solid Waste Section within 30 days. An updated water

quality monitoring plan for the White Street Phase II Landfill should also be included in the Corrective Action Plan (CAP) that will be submitted after the assessment of corrective measures public meeting and approval of the selection of the remedy(ies). Please call me at (919) 508-8500 if you have any questions or concerns regarding this letter. Thank you for your continued cooperation with this matter.

Sincerely,



Jaclynne Drummond
Hydrogeologist
Environmental Compliance
Solid Waste Section

cc: Connel Ware, S&ME
Mark Poindexter, Field Operations Supervisor
Deb Aja, Western District Supervisor
Hugh Jernigan, Waste Management Specialist
Solid Waste Central Files