



North Carolina Department of Environment and Natural Resources
Division of Waste Management

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

April 26, 2010

Mr. D. H. Griffin
D. H. Griffin Wrecking Company, Inc.
P.O. Box 4657
Greensboro, North Carolina 27407

Re: Groundwater Assessment Monitoring Plan
Closed Wiley Davis Road Landfill
Permit Number 41-B, Guilford County
Document ID Number (DIN) 10429

Dear Mr. Griffin:

The NC Solid Waste Section (SWS) has performed a file review of the closed Wiley Davis Road Landfill to determine the current status of groundwater contamination and assessment at the site. In addition, Hugh Jernigan, SWS Waste Management Specialist, conducted a compliance audit at the site on February 12, 2010 and noted monitoring wells at the landfill which appeared to be abandoned or unlocked. During the file search, we reviewed a letter sent to D.H. Griffin by Larry Rose of the SWS in February 2003 requesting that an environmental assessment plan be submitted addressing groundwater flow direction and horizontal and vertical extent of groundwater contamination at the site. A copy of this letter is attached. The letter also states that contaminants were detected across the creek and that future investigation at the site needed to evaluate whether the plume had migrated beneath the creek. To date, the SWS has not received a plan from D.H. Griffin addressing groundwater contamination and assessment at the Wiley Davis Road Landfill.

It is our understanding that certain monitoring wells at the landfill have been abandoned due to highway construction activities and that the Department of Transportation intended to replace the abandoned wells. Please document the status of abandoned wells and installation of replacement wells and submit the appropriate well abandonment and well construction forms to the SWS.

Please submit a report detailing the status of the groundwater assessment at the site including data, maps, and figures illustrating the current horizontal and vertical extent of groundwater contamination at the Wiley Davis Road Landfill. The report should include any data that has been collected across the creek to verify contaminant levels in groundwater adjacent to the residential area. If the groundwater contamination has not been fully characterized or has migrated off-site, please include a plan describing the steps which will be taken to complete the assessment of contamination in groundwater.

Within 60 days of receipt of this letter, please submit the requested status report and groundwater assessment plan with a schedule detailing implementation of the assessment plan for SWS approval. If you have any questions, you may contact me at (919)508-8506.

Sincerely,



Christine Ritter
Hydrogeologist
Solid Waste Section

Enclosure

cc: Phillip Rahn, Waters Edge Environmental, LLC
Mark Poindexter, DWM
Jason Watkins, DWM
Hugh Jernigan, DWM

Central File

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 12, 2003

Mr. D.H. Griffin
D.H. Griffin Wrecking Company, Inc.
P.O. Box 4657
Greensboro, N.C. 27407

Re: Closed Wiley Davis Road Landfill (Permit # 41-B) - Phase II Groundwater Assessment

Dear Mr. Griffin:

As you are aware, the Wiley Davis Road Landfill is in the process of undergoing a water quality assessment that began in the Spring of 2000. The goal was to understand the extent of the contamination that had been detected during previous monitoring events. A number of contaminants were found in several of the wells. Of primary concern are the two widely used industrial solvents, tetrahydrofuran and chlorobenzene. Both were detected several times in groundwater at greater concentrations than regulatory limits allow and both are resistant to natural degradation.

Although a significant amount of information has been generated by the work that has been done, the vertical and horizontal extent of the contamination has not been fully determined. NCAC Title 15A Subchapter 2L, *Classifications and Water Quality Standards Applicable To The Groundwaters of North Carolina*, requires that the areal extent of contamination be determined at a site with known contamination. Consequently it will be necessary to proceed with the assessment.

Please provide the Solid Waste Section within 60 days of receipt of this letter, an addition to the current environmental assessment plan that addresses the issues of contaminant extent, both vertically and horizontally, and groundwater flow direction at the site. Emphasis should be placed on the area across the creek that borders the landfill and separates it from the adjacent residential areas that are served by potable wells. Contaminants have already been detected across the creek at the southern end of the landfill and there is reason to believe, because of the water level measurements in wells MW-4 and MW-4D, that the contaminant plume could have migrated beneath the creek in the upper area.

The Department of Transportation has agreed to replace the monitoring wells that were abandoned at the south end of the landfill because of highway construction activities. It is my understanding that the construction is not due to be completed until the spring or summer of 2004. At that time all or some of the abandoned wells will be replaced.

Thank you for your past cooperation. The D.H. Griffin Construction Company, Inc. has been very diligent in resolving this matter. If you have any questions, please call me at (919) 733-0692, extension 257.

Sincerely,

Larry Rose

Environmental Compliance Unit
Solid Waste Section

cc: James C. Coffey - Chief, Solid Waste Section
Mark Poindexter - Head, Field Operations Branch
Brent Rockett - Western District Supervisor
Hugh Jernigan - Waste Management Specialist
Cheryl Marks, Hydrogeologist

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