



North Carolina Department of Environment and Natural Resources

Division of Waste Management

Dexter R. Matthews

Director

Beverly Eaves Perdue
Governor

Dee Freeman
Secretary

February 16, 2009

Mr. Frank Ralph
Director of Public Utilities.
P. O. Box 70
Halifax, North Carolina 27839

Subject: Revised Corrective Action Plan
Halifax County C & D Landfill, Area 1
Permit 42-04
Doc ID 6655

Dear Mr. Ralph:

The Solid Waste Section (SWS) reviewed the Corrective Action Plan (CAP) for the Halifax County Landfill, Area 1. The following revisions are necessary at this time. One, update Table 4 to reflect current state groundwater quality standards for all the listed constituents. Include the standard for bis (2-ethylhexyl) phthalate and alpha BHC. Although bis (2-ethylhexyl) phthalate is not reported as a constituent of concern now, it is reportedly detected above the state standard without specification of that standard. Two, in Section 2.7 include toluene on the list of "exceedences", since elsewhere in the CAP it is identified as exceeding the state standard. Three, present a plan to address deterioration of the groundwater monitoring wells mentioned at the end of Section 2.1. Pursuant to Regulation 15A NCAC 2C .0108(c)(12), condition of wells should not "preclude accurate chemical analysis of any fluid samples collected." Finally, submit information for financial assurance. Understood is that it is referenced in Attachment I of the Permit to Operate (PTO) submitted for the site. However, in neither the PTO, previously submitted permit modification application, or current financial instrument is there a "detailed written estimate, in current dollars" pursuant to Regulations 15A NCAC 13B .1628(a)(4) and 1628(d). The CAP is required pursuant to 15A NCAC 13B .0547(4)(c), effective July 1, 2008.

The revised CAP should be submitted within 30 days of the receipt of this letter. If you have questions, please contact me at 919-508-8401 or at zinith.barbee@ncmail.net.

Sincerely,

Zinith Barbee
Project Manager
Solid Waste Section

cc: Ed Mussler	Solid Waste Section
Mark Poindexter	Field Operations Supervisor
Donald Herndon	SWS CO
Joan Smyth, L.G.	RSG & Asso., Inc.
Central File	