



North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor
Dee Freeman, Secretary

October 13, 2011

Sent Via Email – majones@hendersoncountync.org

Mr. Marcus Jones
Henderson County
Director of Engineering
802 Stoney Mountain Road
Hendersonville, NC 28791

Re: *Assessment Monitoring Work Plan*
Henderson County Closed Stand Alone C&D Landfill, Permit Number 45-01
Doc ID 15412

Dear Mr. Jones:

The Solid Waste Section has completed a review of the *Assessment Monitoring Work Plan* dated September 21, 2011 (Doc ID 15231) and submitted on behalf of Henderson County by Golder Associates NC, Inc. for the stand alone and closed Henderson County C&D Landfill. The *Assessment Monitoring Work Plan* was prepared pursuant to 15A NCAC 13B .0545 and based upon the results of the *Anomalous Detections of Volatile Organic Compounds* report dated September 28, 2010. Volatile organic compound detections and exceedances have historically been documented within groundwater monitoring wells MW-11, MW-12, and MW-13 since April 2003, and based upon *Anomalous Detections of Volatile Organic Compounds* report, landfill gas is the most likely source for the detected volatile organic compounds within the facility's groundwater.

Henderson County will conduct the following:

1. Install one methane gas monitoring well near the compliance boundary within the southwestern portion of the C&D Landfill;
2. Purchase a privately owned tract of land located southwest of the C&D landfill;
3. Analyze additional groundwater quality parameters within the upgradient and downgradient monitoring wells at the C&D landfill in accordance with 15A NCAC 13B. 0545(b)(2). The additional parameters will include all of the constituents listed within the Appendix II of 40CFR 258 and the required indicator parameters for C&D landfills (chloride, manganese, sulfate, iron, specific conductance, pH, temperature, alkalinity, total dissolved solids, and tetrahydrofuran). The September 2011 semiannual groundwater monitoring event will be the first sampling event for these additional parameters and as required by Rule, a minimum of four independent samples from each well will be collected and analyzed to establish background for the new constituents;
4. Upon the completion of each of the background sampling events, semi-annual reports will be submitted and upon completion of the final background sampling event, a report will be submitted in accordance with 15A NCAC .0545(b)(7); and
5. Pending the results of background sampling results, Henderson County may petition the Division to return to a Detection Monitoring Program [15A NCAC 13B .0545(b)(9)], request selective Assessment Monitoring for a subset of wells impacted by VOCs and/or a subset of Appendix II

1

constituents for analysis [15A NCAC .0545(b)(6)], and/or will begin the process to implement Assessment of Corrective Measures for landfill gas to groundwater impacts [15A NCAC 13B .0545(c)].

As a result, the *Assessment Monitoring Work Plan* is approved as described. If you have any questions or concerns regarding this letter, please contact me at 919-508-8500 or jaclynne.drummond@ncdenr.gov. Thank you for your continued cooperation with this matter.

Sincerely,



Jaclynne Drummond
Compliance Hydrogeologist
Solid Waste Section

cc via email: Natalie Berry, Henderson County Assistant Engineer (nberry@hendersoncountync.org)
Mark Poindexter, Field Operations Supervisor
Jason Watkins, Western District Supervisor
Andrea Keller, Environmental Senior Specialist
Larry Frost, Permitting Engineer
Elizabeth Werner, Permitting Hydrogeologist