

# ALTAMONT ENVIRONMENTAL, INC.

ENGINEERING & HYDROGEOLOGY

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May 20, 2010

*emailed to jaclynnedrummond@ncdenr.gov*

Jaclynn Drummond  
Hydrogeologist  
Environmental Compliance, Solid Waste Section (SWS)  
North Carolina Department of Environment and Natural Resources  
1646 Mail Service Center  
Raleigh, North Carolina, 27699-1646

**Subject:** Suggested Additional Scope of Work  
Limited Soil and Surface Water Assessment Report  
Jackson County, Scott Creek MSW and C&D Transfer Facility, Permit # 50-03T

Dear Ms. Drummond:

On the basis of Jackson County's request, Altamont Environmental, Inc. (Altamont) reviewed your letter dated May 3, 2010 (Re: Limited Soil and Surface Water Assessment Report, Jackson County Scott Creek MSW and C&D Transfer Facility, Permit #50-03T) and Municipal Engineering Services's *Limited Soil and Surface Water Assessment Report* (dated March 15, 2010), which your letter references. The purpose of the review was to provide Jackson County with our suggestions for subsequent sampling at the facility. We also visited the site on May 14, 2010 with Mr. Chad Parker.

On the basis of this review, we make the following observations:

- Leakage of liquid in contact with waste does not consistently occur for every truck that is staged at the facility. Leaks of the September 24, 2009 magnitude occur rarely, commonly in association with heavy rainfall, for a finite time period.
- The waste for which the liquid was in contact with was rather innocuous, commonly dry goods and grocery store refuse. The contact time of the liquid and the waste was relatively short—on the order of hours to a few days.
- The locations of the soil samples collected by Municipal appear to be appropriate. One soil sample was collected at a small collection point on the south side of the roadway, just upstream of where the liquid crossed over to the north side of the road. The second sample was collected more upslope on the south side of the roadway but nearer to where the trucks were staged. The background soil sample (HA-BG) was collected further along the south side of the roadway upslope of the trucks.
- The sample collection depths 12 inches and 24 inches also appeared to be appropriate to evaluate the potential impact of the surface liquid on the soil quality (even though the Municipal's work plan noted a target depth of 5 feet below ground surface [bgs]).
- Several metals, including arsenic, barium, cadmium, chromium, lead, selenium, and silver, were detected in one or more of the soil samples. Each of these metals was detected in the background soil sample. Your letter dated May 2, 2010 states that selenium and arsenic appear to be naturally occurring in the soils at the facility. We agree with this suggestion and would note that the remaining metals may also be naturally occurring.

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- Three organic compounds (acetone, benzene, and MEK) were detected in one or more of the soil samples, commonly at J values. Acetone is a common laboratory artifact, especially at low concentrations.
- No constituents of concern were identified in the surface water samples at concentrations above the North Carolina surface water standards (as promulgated in 15A North Carolina Administrative Code 2B.0200s; 2B Standards) or the state's groundwater standards (15A NCAC 2L.0202; 2L Standards).
- Jackson County has almost completed its transfer station upgrade. In middle June, trucks staged at the facility will be under cover and any releases from the trucks will be collected and discharged under permit from the Tuckaseegee Water and Sewer Authority.
- Jackson County is currently conducting the well (potable and non-potable) and receptor survey.

In light of these observations, Altamont feels that additional deeper soil samples to evaluate the extent of organic detections may be warranted, but that the groundwater investigation should be dependent on the results of this additional soil sampling and the well receptor survey. We suggest collecting subsurface soil samples from 4 to 5 feet bgs at the original locations of HA1 and HA 2. These soil samples would be analyzed for Appendix I VOCs. If VOCs are detected at concentrations above the existing shallow soil sample concentrations and the well receptor survey shows that receptors are present who may be exposed to unacceptable risks associated with the transfer facility (if any), then groundwater monitoring wells will be considered.

Jackie, we would like to discuss this letter via the telephone. I look forward to calling you on Friday, May 21, 2010 to see if you have a moment to discuss this matter.

Thank you for your consideration of this letter, and we appreciate your support on this project. Please feel free to call me at 828-771-0442 with any questions or if you need additional information.

Sincerely,

ALTAMONT ENVIRONMENTAL, INC.



Alec Macbeth, PG

Cc: Ken Westmoreland, Jackson County Manager  
Chad Parker, Jackson County Solid Waste Director