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SOLID WASTE MANAGEMENT		

CIVIL/SANITARY/ENVIRONMENTAL ENGINEERS

**Municipal  
Services**

SITE PLANNING/SUBDIVISIONS



**Engineering  
Company, P.A.**

SUBSURFACE UTILITY ENGINEERING (SUE)

December 11, 2008

Mr. Zinith Barbee  
Solid Waste Section  
Division of Waste Management  
North Carolina Department of Environment and Natural Resources  
401 Oberlin Road, Suite 150  
Raleigh, NC 27605



Re: Petition to Return to Detection Monitoring  
Lenoir County Sanitary Landfill  
Permit No. 54-03

Mr. Barbee:

Regarding your letter dated November 14, 2008, we would like to respond and restate why Lenoir County Sanitary Landfill is in compliance with Rule .1634 (e) and should return to detection monitoring.

Mercury has been detected substantially below the 2L limits and without any statistically significant results in January 2007, July 2007 and January 2008 sampling events and has never exceeded the 2L standards. All data supports steadily decreasing concentrations of mercury in multiple wells. 1,1 dichloroethane was not detected in January 2007, July 2007 and January 2008. Sampling has not detected 1,1 dichloroethane in exceedance of 2L standards since August 1997, nor have any detections been found to be statistically significant.

In the ACM Cobalt was classified as a naturally occurring metal and was not of concern. Cobalt does not occur in any location above the 70 ug/L groundwater protection standard and is not outside the relevant point of compliance. Cobalt was not statistically significant based on January 2007 and July 2007 sampling events. In the January 2008 sampling event, Cobalt was detected well below the groundwater protection standard but slightly higher than other wells for this event. Upon further analysis, it was determined to not be statistically significant compared with historical well data; therefore, complying with 0.1634 (e).

In summary, Lenoir County is in compliance with Rule .1634(e) for sampling events January 2007, July 2007 and January 2008. Considering the current economic situation many towns, cities and counties are

facing it could be detrimental to impose an extremely costly, time consuming process onto a county that does not fit the profile to warrant corrective action.

If you have any questions or need additional information please contact me at 919-772-5393.

Sincerely,

MUNICIPAL ENGINEERING SERVICES CO., P.A.



Madeline German  
Geoscientist



D. Wayne Sullivan  
Project Manager

cc Tom Miller  
Mark Poindexter