



North Carolina Department of Environment and Natural Resources

Division of Waste Management

Dexter R. Matthews

Director

Beverly Eaves Perdue  
Governor

Dee Freeman  
Secretary

October 29, 2010

Mr. Tom Miller  
Solid Waste Director  
P. O. Box 3289  
130 S. Queen Street  
Kinston, North Carolina 28501

Subject: Corrective Action Plan  
Lenoir County Sanitary Landfill  
Construction and Demolition (C&D) Landfill Over Municipal Solid Waste (MSW)  
Permit 54-03  
Doc ID 11908

Dear Mr. Miller:

Following review of sampling results for the Corrective Action Plan (CAP), the Solid Waste Section (SWS) determined that Lenoir County Sanitary Landfill discontinued Appendix II monitoring without approval. The SWS conducted a routine review of sampling results for the CAP. The SWS also reviewed a permit application, which refers to the CAP. Municipal Engineering Services Company, Inc (MESCO) submitted the CAP. An updated CAP should be submitted to reflect corrections and changes in design presented in the application.

To date the SWS received two reports of semi-annual sampling events (report) for the CAP: the first in July 2009 (Doc ID 9258) for sampling three months prior to approval of the CAP; the second, January, 2010 (Doc ID 11345) after approval of the CAP. In both reports only results for Appendix I constituents are submitted. The SWS approved the CAP (Doc ID 8710) on October 2, 2009. Implementation of the CAP should be in accordance with Regulation 15A NCAC 13B .1637. Corrective actions described in the CAP are selected remedies for groundwater contamination described in the ACM (Doc ID 8712) approved on November 1, 2007 (Doc ID 3327). Remedies presented in the ACM should be in accordance with Regulations 15A NCAC 13B .1635 and 1636. In the all aforementioned regulations, monitoring for Appendix II constituents is specified. Text in the CAP should be corrected to reflect the regulatory requirement.

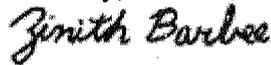
The SWS determined that Lenoir County Sanitary Landfill revised the surfacewater monitoring plan for the CAP without approval. In the semi-annual sampling report dated April 8, 2010 (Doc ID 10345), SW-2 is shown renamed to SW-3. Hence, the status of SW-2 is unclear. Also, implied with the addition of SW-3 is more monitoring than currently reported. Surfacewater monitoring is addressed in Section 4.2, entitled. "Surfacewater Sampling and

Monitoring”. Text in the CAP should be revised to reflect the change, including an explanation for the change, and all maps in the CAP should be updated to depict all the sampling stations.

The SWS reviewed a permit application for the Lenoir County Sanitary Landfill C&D Over MSW in accordance with Regulation 15A NCAC 13B .0547(4). The regulation addresses the CAP. Included in its review (Doc ID 11691) is comment on Lenoir County Sanitary Landfill’s proposal to increase landfill capacity. With increased capacity is potential for a larger source of contamination. Controlling sources of contaminants is specified in the CAP. See Sections 2.3 and 2.6, entitled, “Source Control Measures”. Also in the aforementioned sections, reliance on an “existing methane extraction system” is identified as a measure to control contamination at the source. Reflected in a revised CAP should be any change made in the methane extraction system to accommodate increased capacity. Please note: the existing methane extraction system should not be confused with Landfill Gas Monitoring Plans now reviewed by SWS hydrogeologists. The CAP should be revised to address the affect of more landfill capacity.

An updated CAP should contain revisions in the text and maps to reflect findings in the SWS reviews. Corrections in sampling and sampling reports should be reflected in subsequent semi-annual sampling reports. Corrections to the current CAP should be shown in a revised CAP submitted to the SWS. If you have questions, please contact me at 919-508-8401 or [zinith.barbee@ncdenr.gov](mailto:zinith.barbee@ncdenr.gov).

Sincerely,



Zinith Barbee  
Project Manager  
Solid Waste Section

cc: Mark Poindexter	Field Operations Branch Supervisor
Ed Mussler	SWS Permitting Branch Supervisor
Ming Chao	SWS Environmental Engineer
Christine Ritter	SWS Permitting Hydrogeologist
Madeline German	Municipal Engineering Services Co., P.A.
Central File	