

OPERATION/CONSTRUCTION MANAGERS

CIVIL/SANITARY ENGINEERS

**Municipal
Services**



**Engineering
Company, P.A.**

November 4, 2010

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: Response to Document ID 11908
Lenoir County Construction and Demolition (C&D) Landfill Over Municipal Solid Waste (MSW) Landfill
LaGrange, NC 28501
Permit No. 54-03
MESCO Project No. G07062.0

Dear Mr. Barbee:

Municipal Engineering Services Company, P.A. (MESCO) on behalf of Lenoir County, provides the following responses to your October 29, 2010 letter (Doc ID 11908) regarding the Lenoir County Corrective Action Plan, approved October 2, 2009.

In the initial paragraph, you stated "Following a review of sampling results for the Corrective Action Plan (CAP), the Solid Waste Section determined that Lenoir County Sanitary Landfill discontinued Appendix II monitoring without approval." As shown on the attached SWS document, Lenoir County discontinued Appendix II assessment monitoring for their monitoring wells, except MW-3 in 2002, per approval from Larry Rose. MW-3 has maintained annual monitoring for Appendix II parameters, in accordance with the approved plan. Additionally, the CAP and the Sampling and Analysis Plan included in the CAP, approved by Zinith Barbee, do not require Appendix II sampling parameters.

In paragraph two you stated "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." Referenced Solid Waste Section (SWS) Doc ID 9258 is a Monitored Natural Attenuation (MNA) update for the July 2009 event, not a semi-annual groundwater sampling report. Document ID 11345 could not be located for Lenoir County. An additional MNA update was submitted for the January 2010 event, Doc ID 10345.

As stated in our semi-annual reports, MESCO previously submitted MNA updates, separately from the semi-annual reports. It was our position that MNA updates were a supplemental brief, submitted semi-annually, intended to keep the SWS current on MNA and/or remediation progress and results. However, per a meeting with the SWS representatives on October 18, 2010, MNA data will now be included with the semi-annual sampling report.

Paragraph three states "The SWS determined that Lenoir County Sanitary Landfill revised the surfacewater monitoring plan for the CAP without approval." An extensive explanation was provided in the January 2010 semi-annual sampling report regarding surface water location names; the following text from that report is provided for your convenience: "Prior to this event it was confirmed that E1(Environment 1) had consistently been collecting

surface water sample SW-2 from a location which was different than that referenced in all previous SAPs. Therefore, beginning with this event, the upstream surface water point previously designated as SW-2 in all previous SAPs, located upon Fredrick's Branch just east of Hodges Farm Road, is now designated SW-3 in order to differentiate future data from the historically compiled data." The CAP will be amended to reflect this name change.

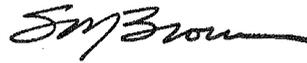
Regarding paragraph four and the previously submitted proposal to increase landfill capacity; MESCO has responded to permit comments from the State (Doc ID 11691) and will no longer be adding an additional 118 years of life to the C&DLF. Updates to the CAP will be conducted as necessary based on facility conditions.

MESCO regrets that submitting independent MNA updates caused additional confusion and hopes including this information in the semi-annual sampling reports will help alleviate further misunderstandings. Please contact us by phone at (919) 772-5393 or by email at mgerman@mesco.com or mbrown@mesco.com with questions or comments.

Sincerely,
MUNICIPAL ENGINEERING SERVICES CO., P.A.



Madeline German
Geoscientist



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Senior Professional Geologist
NC License #1711

Enclosures

cc: Mr. Tom Miller, Lenoir County Solid Waste Director
Mr. Wayne Sullivan, MESCO