



North Carolina Department of Environment and Natural Resources

Division of Waste Management

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

November 22, 2011

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

RE: Corrective Action Evaluation Report (CAER)
Lenoir County Active C&D over Closed Unlined MSWLF
La Grange, NC 28501 Permit #54-03
Document ID No. 15524

Dear Mr. Miller:

The Solid Waste Section has completed a review of the referenced Corrective Action Evaluation Report (CAER) (DIN 13653) dated April 12, 2011 and submitted on behalf of Lenoir County by Municipal Engineering Services Company for the Lenoir County Sanitary Landfill. The CAER also included a revised Groundwater and Surface Water Sampling and Analysis Plan.

The CAER was submitted pursuant to the County's Corrective Action Plan (CAP) approved by the Solid Waste Section on October 2, 2009. Monitored Natural Attenuation (MNA) was approved as the selected remedy for this landfill. The MNA baseline was established by conducting four consecutive semiannual sampling events conducted during July 2009, January 2010, July 2010, and January 2011.

The groundwater constituents of concern identified in the Assessment of Corrective Measures (ACM) and CAP are: 1,1-dichloroethane, mercury and cobalt. The most recent water quality sampling results collected in January 2011 reported benzene and vinyl chloride at concentrations above North Carolina 2L Groundwater Standards in monitoring well MW-12. Cobalt was also reported at low concentrations although there is no established 2L standard. Tetrachloroethene, toluene, and 4-methyl-2 pentanone were detected above laboratory MDLs. Metals continue to be detected across the facility in both groundwater and surface water samples. In addition, vinyl chloride was detected in MW-11 above 2L standards during 2009 and 2010 sampling events and 1,1-dichloroethane was detected in MW-3 above the 2L standard in July 2010.

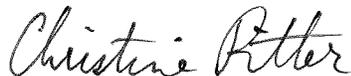
Per the CAER report, the baseline MNA sampling and the Biochlor modeling, there is adequate evidence that natural attenuation is occurring in the groundwater at the landfill site. The recent detections of vinyl chloride in monitoring wells MW-11 and MW-12 may provide further evidence of natural attenuation mechanisms.

At this time, Lenoir County's request to discontinue corrective action procedures including MNA monitoring is not approved. The revised Groundwater and Surface Water Sampling and Analysis Plan submitted as Appendix B of the CAER stating that natural attenuation will be discontinued in Lenoir County is also NOT approved at this time. 15A NCAC 13B .1637 (e) states that remedies selected (pursuant to Rule .1636) shall be considered complete when compliance with the approved groundwater protection standards has been achieved by demonstrating that concentrations of Appendix II constituents have not exceeded these standards for a period of three consecutive years using the statistical procedures and performance standards in Rule .1632.

Consequently, the currently approved October 2, 2009 Corrective Action Plan and Groundwater and Surface Water Sampling and Analysis Plan approved April 30, 2009 will remain in effect. Please continue to conduct MNA sampling for the approved MNA parameter list on a semiannual basis to determine site variability and rates of change in geochemistry, flow, and contaminant concentrations. In addition, please perform the MNA screening model on an annual basis.

If you have any questions regarding this letter, please contact me at (919) 707-8254 or by email at Christine.ritter @ncdenr.gov.

Sincerely,



Christine Ritter
Hydrogeologist
Solid Waste Section

cc: Mark Poindexter, DWM
Dennis Shackelford, DWM
Drew Hammond, DWM
Wayne Sullivan, Municipal Engineering Services Company