



Via e-mail (scanned copy)

Permit No.	Date	Document ID No.
56-03	November 5, 2010	12107

November 4, 2010

Mr. Allen Gaither
North Carolina Dept. of Environment and Natural Resources
Asheville Regional Office
Division of Waste Management - Solid Waste Section
2090 U.S. 70 Highway
Swannanoa, NC 28778

RE: Revised Workplan
Financial Assurance Request
Collins and Aikman Industrial Landfill
McDowell County, Permit #56-03, Document ID No. 11245

Dear Mr. Gaither,

Based on a review of the North Carolina Department of Environment and Natural Resources (NCDENR) October 20, 2010 Request for additional Information, International Automotive Components North America, Inc. (IACNA) is submitting this revised Workplan for Landfill Investigation and Closure. The Subject Site is located at 1240 Parker-Padgett Road, Old Fort, North Carolina, identified in this Workplan as the Subject Site. This Workplan is based on a review of the following:

- IACNA file on the Subject Site, which mostly consists of documents transferred from Collins & Aikman during the acquisition of the Subject Site by IACNA.
- Information collected by RJN Environmental, Inc. (RJN) during an October 2009 groundwater sampling event.
- An August 25, 2010 conference call with you, me, Donald Herndon of the NCDENR - Division of Waste Management, and Robert Nowakowski of RJN.
- The NCDENR October 20, 2010 Request for Additional Information. In this letter, additional information was requested for the following three items:

1. A disposal plan for all waste material removed during boring and well drilling activities.

Refer to Point #5 in the Scope of Services below for the disposal plan.

2. A plan for closing / backfilling boring locations upon completion of assessment activities.

Refer to Point #6 in the Scope of Services below for the backfilling of soil boring plan.

3. Indicate if the landfill gas monitoring well (will) be abandoned at the conclusion of the assessment activities.

Refer to Point #2 in the Scope of Services below for the proposed abandonment of the methane well.

The subsurface investigation is necessary because there are a number of unknowns regarding this landfill, including: the presence of methane or other gases; what the actual contents of the landfill are; and an accurate estimate on the volume and dimensions of the landfill.

As a result on behalf of IACNA, RJN has prepared this Workplan to identify the contents, volume and dimensions of the landfill, as well as determine whether or not landfill gases are accumulating within the landfill.

SCOPE OF WORK

1) RJN will monitor the advancement of approximately 40 soil borings placed throughout the landfill area to determine: 1) the depth of the landfill each location; and 2) to collect representative soil samples for laboratory analysis to document the nature of the materials within the landfill. At no time will RJN pierce the clay lining beneath the landfill. A North Carolina certified well driller will be contracted with to advance the soil borings.

2) In addition, a four-inch monitoring well will be located within the middle interior of the landfill to monitor for soil gases. This monitoring well will be set on top of the confining clay layer, and will be screened to within 10 feet of the surface. The actual depth of this monitoring well is not known at this time and will be determined in the field. Field gas measurements will be made subsequent to the installation. In addition, field gas measurements will be collected at least daily for the duration of the field event.

If measurable levels of gases are recorded during this initial event, IAC personnel will continue to collect data on a daily basis for another month. At this time, the NCDENR will be consulted to determine if the methane well should be left in place or abandoned. If landfill gases are not indicated during the initial event, the methane well will be properly abandoned by removing the well and backfilling with bentonite chips.

3) During the advancement of soil borings, soil samples will be collected at five foot intervals to get a near continuous soil profile. Each of these soil samples will be analyzed in the field with a photoionization detector (PID) and a methane meter to measure the level of organic gases and flammable gases in the soil. These results will be used to select the particular soil samples for laboratory analysis.

4) Selected soil and/or groundwater samples will be analyzed for VOCs by USEPA Method 8260, SVOCs by USEPA Method 8270; and RCRA 8 Metals by USEPA Methods 6010 and 7470. In addition, a selected number of soil samples will be subjected to toxicity characteristic leachate procedure (TCLP), that will mimic landfill conditions over time.

5) All waste material generated including, soil cuttings, decontamination fluids and cleaning supplies will be containerized in 55-gallon drums for proper future disposal. The soil cuttings will be segregated from the decontamination fluids and cleaning supplies. The drums will be stored near the top of the landfill road, behind the locked fence.

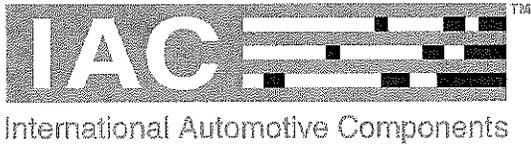
Each container of investigation derived waste will be properly labeled, on the side of the container, and will include the date, location, generator name and contact information. The containers will be marked "pending analysis", until the analytical results are received. If analytical results indicate non-detectable levels or levels of contaminants below NCDENR criteria, the soil and decontamination water will be returned to the landfill and the cleaning and investigation supplies will be removed and disposed of a standard landfill. If detectable levels of contaminants are indicated above NCDENR criteria, the waste drums will be transported to a Type II Landfill for disposal.

- 6) Upon completion of the soil borings, the borings will be backfilled from the base of the soil borings to the surface with bentonite chips.
- 7) The surface level at each soil boring location will be surveyed onto a site plan. Knowing the relative elevations of each soil boring will allow RJN to construct a 3-D model of the landfill and to accurately calculate the volumes of landfill waste that are present.
- 8) To aide in data analysis, the existing Subject Site monitoring wells will be sampled. RJN will collect static elevations and collect a round of groundwater samples. Each well will be tested for organic vapors with a photo-ionization detector (PID), and each of the groundwater samples will be field tested for temperature, pH, oxygen, and conductivity. Collected groundwater samples will be analyzed for RCRA 8 Metals by USEPA Methods 6010 and 7470.
- 9) Upon receipt of the analytical data, RJN will prepare a Site Activities Report to IAC.
- 10) The Site Activities Report will be utilized to prepare a "Closure Plan" and a "Post-Closure Plan". Once IAC reviews these plans, they will be forwarded to Allen Gaither of the NCDENR – Division of Waste Management.

SCHEDULE

The following schedule will be adhered to for the activities outlined in this Workplan for the Subject Site.

- Once approval is received for this Workplan, RJN will require 2 months to plan for and execute the field work.
- Sample analysis will require an additional 2 weeks.
- The Site Activities Report will be completed in an additional 1 month.
- The Closure Plan and Post Closure Plan will be completed in an additional 2 months.



As a result, it is projected that the Closure Plan and Post Closure Plan will be submitted to the NCDENR Division of Waste Management, in just under six months, from the date of approval of this Workplan.

Allen, if you have any additional questions or comments, please let me know by phone at (313) 240-3345, or by e-mail at pkresnak@iacna.com .

Sincerely,

A handwritten signature in black ink, appearing to read "Pat Kresnak", written over a horizontal line.

Pat Kresnak
Director, Environmental Health and Safety
International Automotive Components,
North America

Cc: Bob Nowakowski, RJN Environmental, Inc.