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David Garrett & Associates
Engineering and Geology

June 24, 2009

Ms. Elizabeth S. Werner, Hydrogeologist
NCDENR Division of Waste Management
Solid Waste Section, Permitting Branch
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

RE: Final Ground Water Monitoring Plans
C&D Landfill, Inc. Phase 2
NDENR Solid Waste Permit #74-07

Dear Ms. Werner:

On behalf of Judson Whitehurst and C&D Landfill, Inc., I am pleased to present the following discussion of final well locations and other matters. As issuance of the Permit to Construct draws near (anticipated in mid-July 2009), the facility is making preparations to abandon piezometers in the waste footprint and install new monitoring wells for the opening of Cell 2A. Also, please be advised that the facility is also entering into a ground water assessment monitoring program, which will initially require Appendix II sampling on three wells in the Phase 2 footprint – please refer to correspondence between me and Jackie Drummond of the Solid Waste Section, Compliance Branch from earlier this month.

Our plans are to abandon all the piezometers associated with Phase 2 in preparation for the upcoming cell construction, except for a nested pair that is suitably located for conversion to permanent monitoring wells. Please refer to the attached Figure. We plan to abandon a total of twenty-two (22) piezometers in Phase 2, including B-7 through B-22 and B-24, B-25, B-27 and B-28. The pair that will be left in place will be B-23s and B-23d, which will be converted to MW-14s and MW-14d – these are near the location shown in the approved Water Quality Monitoring Plan. The depths and screen intervals of these piezometers is correct for monitoring this portion of the site, and I am satisfied that the construction is suitable.

Monitoring wells to be installed include MW-9A, MW-10, MW-11, MW-12, and MW-13. Please note that MW-10 through MW-12 will be sampled for Appendix II constituents in pursuit of the assessment monitoring program – this is not to indicate that these wells are contaminated, but sampling these wells will help us bracket an area of interest relative to the nearby Phase 1. The other Phase 2 wells, MW-9A and MW-13, will be sampled for Appendix I constituents.

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At present, I would like to postpone installing and sampling the proposed MW-15 and MW-16, shown in the Figure, since the footprint served by these wells (Cell 2B) will not be constructed for at least 5 years. Other changes to the monitoring plan may be appropriate by then, thus we would like to amend the Water Quality Monitoring Plan (Appendix 5 in the May 2009 Design Hydro Report) to reflect this change. All other wells will be surveyed and activated into the detection monitoring program, with an anticipated semi-annual sampling schedule consisting of November and May sampling events, consistent with Phase 1.

I am seeking your approval of the following:

- Finalized well locations for MW-9A through MW-13, subject to minor field adjustment
- Conversion of piezometers B-23s and B-23d to wells MW-14s and MW-14d
- Postponement of installing MW-15 and MW-16 until future Cell 2B is built
- Relocating surface water sampling location SW-2 to cover both phases (see Figure).

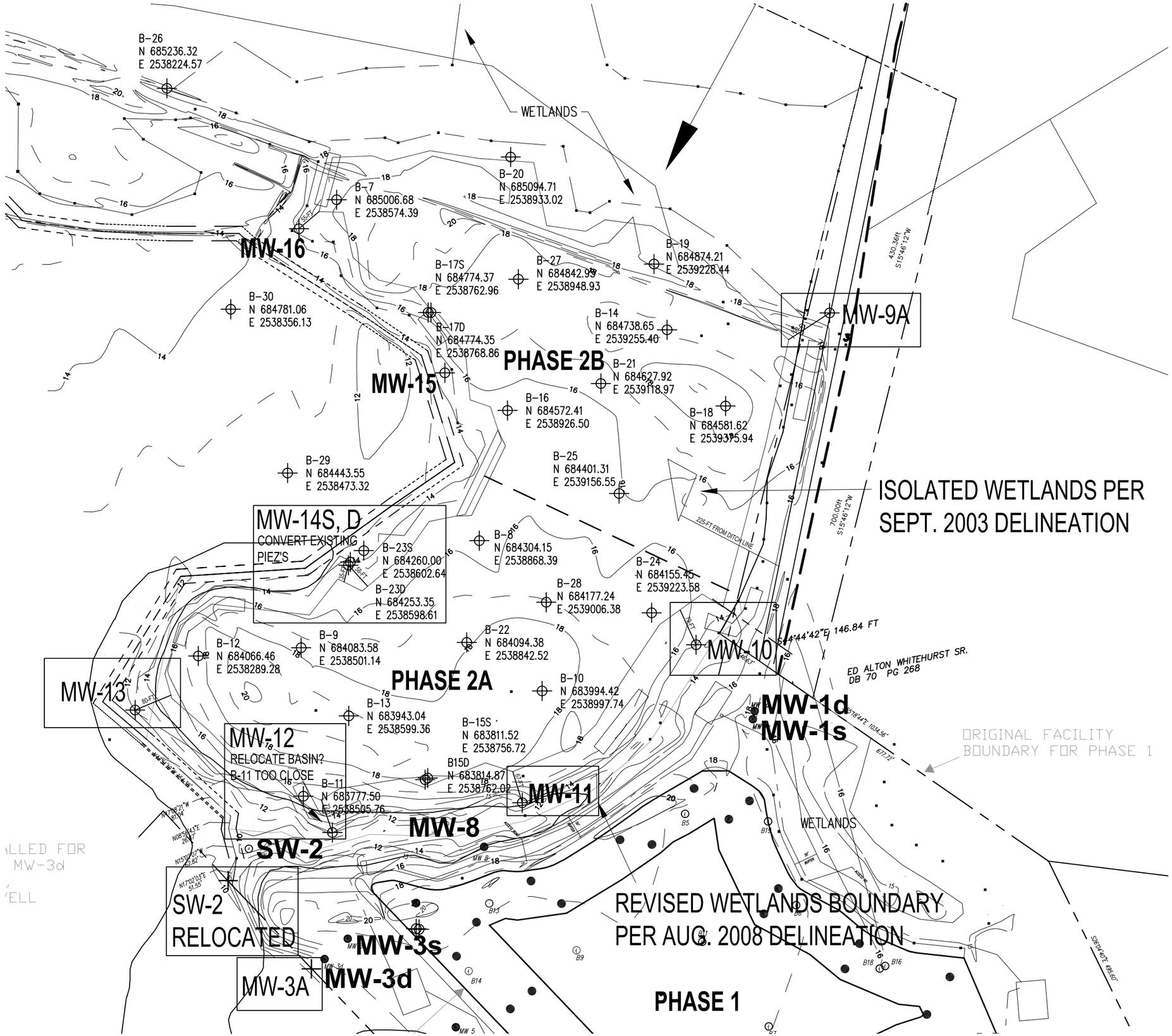
Thank you, in advance, for your attention on this matter. Please contact me at your earliest convenience if you gave questions or comments, or if I may be of assistance.

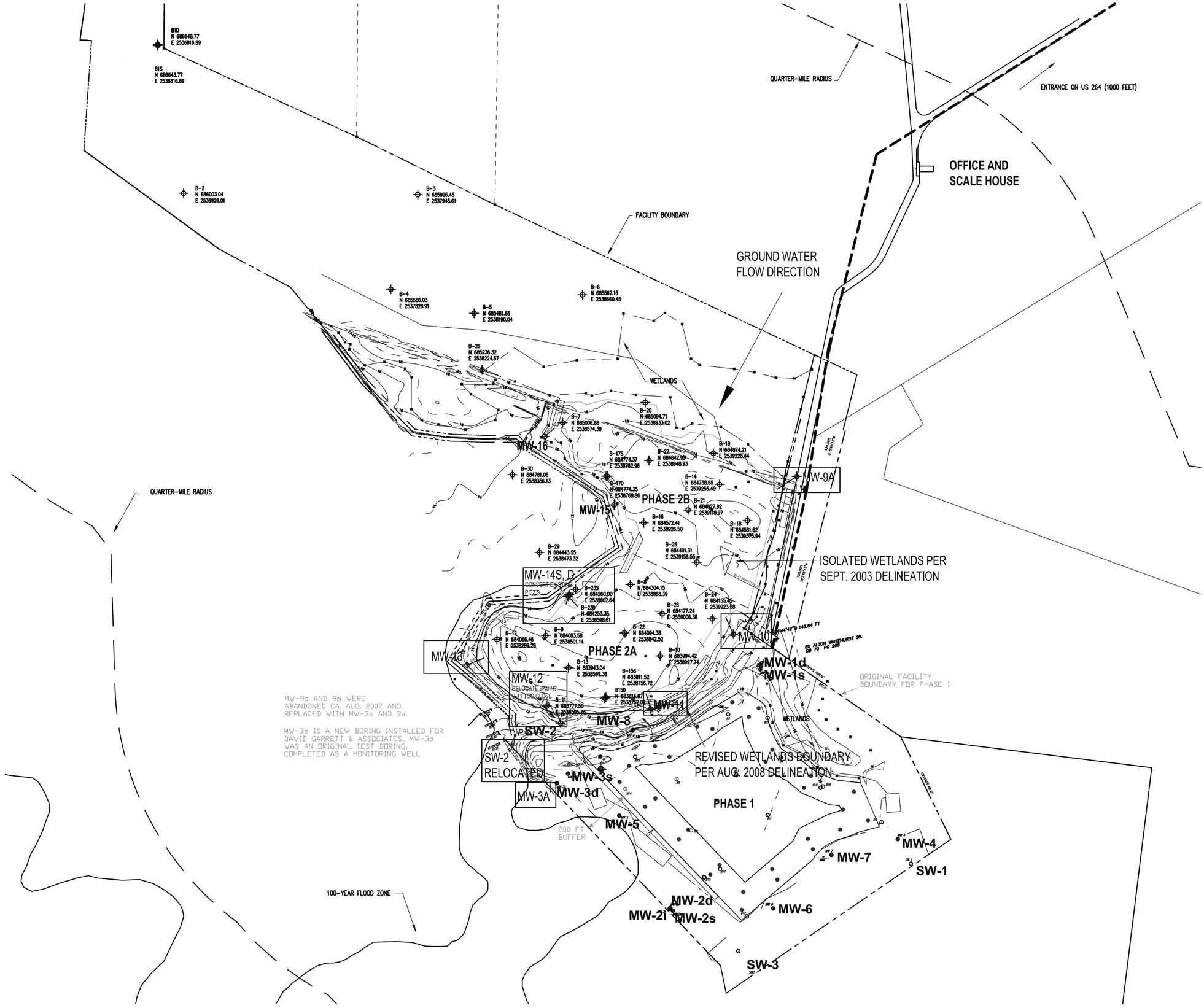
Cordially yours,

G. David Garrett, P.G., P.E.

cc: Judson Whitehurst, Wayne Bell – C&D Recycling, Inc.
Donna Wilson – NC DENR Solid Waste Section, Permitting Branch

Attachment


B-26
N 685236.32
E 2538224.57
WETLANDS
B-20
N 685094.71
E 2538933.02
B-7
N 685006.68
E 2538574.39
MW-16
B-17S
N 684774.37
E 2538762.96
B-27
N 684842.99
E 2538948.93
B-19
N 684874.21
E 2539228.44
B-30
N 684781.06
E 2538356.13
B-17D
N 684774.35
E 2538768.86
B-14
N 684738.65
E 2539255.40
MW-9A
PHASE 2B
MW-15
B-21
N 684627.92
E 2539118.97
B-16
N 684572.41
E 2538926.50
B-18
N 684581.62
E 2539375.94
B-29
N 684443.55
E 2538473.32
B-25
N 684401.31
E 2539156.55
ISOLATED WETLANDS PER
SEPT. 2003 DELINEATION
MW-14S, D
CONVERT EXISTING
PIEZ'S
B-23S
N 684260.00
E 2538602.64
B-23D
N 684253.35
E 2538598.61
B-8
N 684304.15
E 2538868.39
B-24
N 684155.45
E 2539223.58
B-28
N 684177.24
E 2539006.38
B-9
N 684083.58
E 2538501.14
B-22
N 684094.38
E 2538842.52
MW-10
B-12
N 684066.46
E 2538289.28
PHASE 2A
B-10
N 683994.42
E 2538997.74
MW-13
B-13
N 683943.04
E 2538599.36
MW-1d
MW-1s
MW-12
RELOCATE BASIN?
B-11 TOO CLOSE
B-15S
N 683811.52
E 2538756.72
ORIGINAL FACILITY
BOUNDARY FOR PHASE 1
B15D
N 683814.87
E 2538762.02
MW-11
B-11
N 683777.50
E 2538505.76
MW-8
SW-2
WETLANDS
SW-2
RELOCATED
REVISED WETLANDS BOUNDARY
PER AUG. 2008 DELINEATION
MW-3s
MW-3A
MW-3d
PHASE 1
ED ALTON WHITEHURST SR.
DB 70 PG 268



QUARTER-MILE RADIUS
ENTRANCE ON US 264 (1000 FEET)
OFFICE AND SCALE HOUSE
FACILITY BOUNDARY
GROUND WATER FLOW DIRECTION
WETLANDS
MW-16
MW-9A
PHASE 2B
MW-15
QUARTER-MILE RADIUS
ISOLATED WETLANDS PER SEPT. 2003 DELINEATION
MW-14S, D
CONVERT EXISTING PIEZS
MW-10
PHASE 2A
MW-13
MW-1d
MW-1s
ORIGINAL FACILITY BOUNDARY FOR PHASE 1
MW-12
RELOCATE BASIN? 2-11 TOO CLOSE
MW-11
MW-8
SW-2
MW-9s AND 9d WERE ABANDONED CA. AUG. 2007 AND REPLACED WITH MW-3s AND 3d
MW-3s IS A NEW BORING INSTALLED FOR DAVID GARRETT & ASSOCIATES, MW-3d WAS AN ORIGINAL TEST BORING, COMPLETED AS A MONITORING WELL
SW-2 RELOCATED
MW-3s
MW-3A
MW-3d
REVISED WETLANDS BOUNDARY PER AUG. 2008 DELINEATION
PHASE 1
200 FT BUFFER
MW-5
MW-4
MW-7
SW-1
100-YEAR FLOOD ZONE
MW-2d
MW-2i
MW-2s
MW-6
SW-3