



North Carolina Department of Environment and Natural Resources

Division of Waste Management

Dexter R. Matthews

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Secretary

June 12, 2009

Mr. Tim Rogers
Solid Waste Director
Solid Waste Department
460 B S Landfill Road
Dudley, North Carolina 28333-5321

Subject: Draft Revised Report Text for Corrective Action Plan
Wayne County Landfill
Construction and Demolition Landfill, Permit 96-01
Doc ID 7551

Dear Mr. Rogers:

The Solid Waste Section (SWS) reviewed the draft of the revised report text (draft report) for the second revision of the Corrective Action Plan (CAP) for the Wayne County Landfill. Municipal Engineering Services Company, P.A. (MESCO) submitted the draft report with its response letter, dated May 14, 2009 (Doc ID 7357) to the SWS's first technical review (Doc ID 7277). Revision of the CAP is necessary, and more information about financial assurance is needed. Specified revisions are listed below. The numbers correspond to the numbered sections in the CAP.

- 1.1 Include information about wells here or elsewhere in the CAP. Abandon the "old WS well" shown on Plate 2 pursuant to 15A NCAC 2C .0113. In the ACM the well is reportedly out of service but has remained open since 2007. Also, in Section 1.2.4 of the ACM, reportedly, no "potable" wells exist within 2000 feet of the facility. However, in the same section, reported are "9 properties within 2000 feet of the facility" with "potable water supply wells". Show these wells on a scaled planview.
- 1.4 Define the contamination plume with field data. In the CAP no maps showing the plume are presented, nor is a monitoring well network established for the selected corrective action—Monitored Natural Attenuation (MNA). See the SWS guidelines for MNA, which specify compliance wells, performance wells, and sentinel wells. The guidelines can be viewed on the SWS website.

http://wastenot.enr.state.nc.us/swhome/technical_assistance.asp

- 8.0 Correct the first statement in the first paragraph to reflect what is reported in the response letter: "financial assurance for corrective action has not been submitted". Also, show the total cost for the years during which corrective action is in effect.

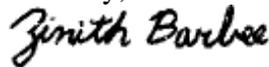
Plates

Plate 3 On this or other plates show location of the relevant point of compliance.

To date the SWS has not received a revised financial assurance mechanism that includes a cost for corrective action. The SWS received a letter from the chief financial officer of Wayne County, dated January 28, 2009 showing financial assurance for the costs of closure and post-closure but not for the cost of corrective action. Pursuant to Regulation 15A NCAC 13B .1628 (d) financial assurance for corrective action is specified. Also please note that in Regulation 15A NCAC 13B .1628 (d)(1)(A) is the specification that the cost estimate be adjusted for inflation. A revised financial assurance mechanism including a cost estimate for the CAP should be sent to Ms. Shawn McKee in the SWS. She can be contacted at 919-508-8512 or at: shawn.mckee@ncdenr.gov.

The revised CAP should be submitted within 30 days of the receipt of this letter. If you have questions, please contact me at 919-508-8401 or at: zinith.barbee@ncdenr.gov.

Sincerely,



Zinith Barbee
Project Manager
Solid Waste Section

cc: Mark Poindexter	Field Operations Supervisor
Ed Mussler	Solid Waste Section
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Shawn McKee	SWS
Sean Patrick	Municipal Engineering Services Co., P.A.
Central File	