



North Carolina Department of Environment and Natural Resources

Division of Waste Management

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October 27, 2010

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

Subject: Corrective Action Plan  
Wayne County Landfill  
Construction and Demolition (C&D) Landfill Over Municipal Solid Waste (MSW)  
Permit 96-01  
Doc ID 11883

Dear Mr. Rogers:

The Solid Waste Section (SWS) conducted a routine review of semi-annual sampling results and followup review for recent compliance issues affecting the Corrective Action Plan (CAP). Municipal Engineering Services Company, Inc (MESCO) submitted the CAP. After reviewing semi-annual sampling results, the SWS determined that Wayne County Landfill discontinued Appendix II monitoring without approval. Compliance issues affecting the CAP pertain to the *Impounded Water and Leachate Removal Plan* submitted to the SWS and Compliance Order issued by the SWS, both of which addressed a leachate breakout reported in March, 2010. The SWS also reviewed a permit application (Doc ID 11748), which refers to the CAP. In addition to sampling for proper constituents, an updated CAP should be submitted to reflect changes that incorporate permanent corrective measures in response to compliance action and changes in design presented in the application.

To date the SWS received two reports of sampling events (report) for the CAP: the first in August 2009 (Doc ID 9259), prior to approval of the CAP; the second, February, 2010 (Doc ID 11336) after approval of the CAP. In both reports, only results for Appendix I constituents are submitted. The SWS approved the CAP (Doc ID 8821) on October 23, 2009. Implementation of the CAP should be in accordance with Regulation 15A NCAC 13B .1637. Corrective actions described in the CAP are remedies selected for groundwater contamination described in the ACM (Doc ID 8826) approved on November 1, 2007. Remedies presented in the ACM should be in accordance with Regulations 15A NCAC 13B .1635 and 1636. In all the aforementioned regulations, monitoring Appendix II constituents is specified.

The CAP has been reviewed in the conjunction with compliance issues associated with the reported leachate release. In response to a Compliance Order, dated July 16, 2010, MESCO submitted the report, "*Potentially Impacted Soil and Groundwater Assessment*" (Doc ID 11529).

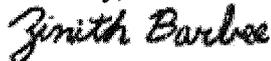
The SWS reviewed the report and specified sampling the groundwater monitoring well, MW-2, and “water feature near MW-3” (Doc ID 11549). MW-2 is part of the groundwater network for Monitored Natural Attenuation (MNA) described in the CAP; therefore, should be monitored for Appendix II constituents. Downstream of the “water feature” referenced in the report is the surfacewater sampling station SW-1, which is also part of the surfacewater network described in the CAP. It is not listed in semi-annual sampling events. Therefore, SW-1 should be reported in subsequent semi-annual sampling events and included in responses for compliance action.

Also in response to the leachate release, MESCO submitted for Wayne County Landfill the “*Impounded Water and Leachate Removal Plan*” (Doc ID 11741). MESCO proposed “to excavate the MSW cap” and construct a swale through the C&D over MSW. Maintenance of the MSW soil cap is among measures described in the CAP to control sources of contamination. See Section 2.3, entitled “Source Control Measures”. The SWS commented on the proposed swale in a review of the plan (Doc ID 11748). The comments are applicable to the CAP. The CAP should be updated to show the location and detail of the proposed swale. Description of its effect on the contamination plume addressed by the CAP should be included in the update.

The SWS reviewed a permit application for the Wayne County Landfill C&D Over MSW (Doc ID 11748) in accordance with Regulation 15A NCAC 13B .0547(4). The regulation addresses the CAP. That review included SWS comments on proposed changes in the landfill gas collection and control system (LFGCC). The LFGCC is also part of the CAP. See Section 3.1.2, entitled “Existing Gas Collection and Control System”. Comments in the SWS review are applicable to the CAP. The LFGCC should not be confused with Landfill Gas Monitoring Plans now reviewed by SWS hydrogeologists. Direction for those plans is contained in prior SWS communication (Doc ID 11170). Because the LFGCC is incorporated into the CAP, the CAP should be updated to reflect changes to the LFGCC presented in the application.

An updated CAP should contain revisions in the text and maps to reflect findings in the aforementioned reviews. Corrections in sampling should be reflected subsequent semi-annual reports. Responses to compliance action should be directed to appropriate personnel. If you have questions, please contact me at 919-508-8401 or [zinith.barbee@ncdenr.gov](mailto:zinith.barbee@ncdenr.gov).

Sincerely,



Zinith Barbee  
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Solid Waste Section

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