

OPERATION/CONSTRUCTION MANAGERS

CIVIL/SANITARY ENGINEERS

**Municipal
Services**



**Engineering
Company, P.A.**

November 4, 2010

Mr. Zarith Barbee
Solid Waste Section
Division of Waste Management
North Carolina Department of Environment and Natural Resources
401 Oberlin Road, Suite 150
Raleigh, NC 27605

Re: Response to Document 11883
Wayne County Construction and Demolition (C&D) Landfill Over Municipal Solid Waste (MSW) Landfill
Dudley, NC 28002
Permit No. 96-01
MESCO Project No. G07058.0

Dear Mr. Barbee:

Municipal Engineering Services Company, P.A. (MESCO) on behalf of Wayne County, provides the following responses to your October 27, 2010 letter (Doc ID 11883) regarding the Wayne County Corrective Action Plan (CAP), approved October 23, 2009.

In the initial paragraph, you stated, "After reviewing semi-annual sampling results, the SWS determined that Wayne County Landfill discontinued Appendix II monitoring without approval." As we reported in the August 2009 semi-annual sampling report, newly installed wells MW-9, MW-10 and MW-11 were sampled for Appendix II parameters in August 2009. This sampling event occurred prior to CAP approval in October 2009. It appears we inadvertently did not sample for the Appendix II list in February 2010, but the most recent sampling event, conducted August 10, 2010, included Appendix II parameter analysis.

As stated in our semi-annual reports, MESCO previously submitted Monitored Natural Attenuation (MNA) updates, as written in the CAP, separately from the semi-annual reports. It was our position that MNA updates were a supplemental brief, submitted semi-annually, intended to keep the Solid Waste Section (SWS) current on MNA and/or remediation progress and results. However, per a meeting with the SWS representatives on October 18, 2010, MNA data will now be included with the semi-annual sampling report.

In paragraph two, you referenced SWS documents Doc ID 9259 and Doc ID 11336 as semi-annual sampling reports, however, these documents are supplemental MNA updates intended to inform the SWS on the corrective action progress and status. MNA updates do not replace or supersede semi-annual groundwater monitoring reports. Semi-annual groundwater monitoring reports have been submitted to the Compliance Section for the August 2009 and February 2010 sampling events in accordance with 15A NCAC 13B .1630.

Paragraph three states "...surface water sampling station SW-1, which is also part of the surface water network described in the CAP. It is not listed in the semi-annual sampling events." SW-1 has an extensive, reported sampling history; documented on field data sheets and in laboratory analysis. SW-1 was included in the August 2009 and February 2010 events, as well as the most recent sampling event conducted August 2010.

In reference to paragraph four in your letter, Section 2.3 of the CAP does not specifically state "maintenance of the MSW soil cap is among measures...to control source contamination." The intention of Section 2.3 *Source Control Measures* is to generally describe existing conditions that illustrate the low risk of additional contamination. The sentence: "Soil cover and caps will be maintained in accordance with the Permit." will be added to alleviate further confusion.

In response to paragraph five, the text: "The County will maintain the Landfill Gas Collection and Control System(LGCCS) to insure efficient operation. There will not be any new LGCCS Title V components installed in the C&D area. The goal is to abandon all Title V LGCCS wells within fifteen(15) years after their installation." from Section 3.1 of the proposed permit, will be added to the CAP upon permit approval.

MESCO hopes these few CAP additions and MNA transmittal modifications will help alleviate further confusion regarding the semi-annual sampling reports and CAP requirements. Additional, updates to the CAP will be conducted as necessary based on facility conditions. Please contact us by phone at (919) 772-5393 or by email at mgerman@mesco.com or mbrown@mesco.com with questions or comments.

Sincerely,
MUNICIPAL ENGINEERING SERVICES CO., P.A.



Madeline German
Geoscientist



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Senior Professional Geologist
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Enclosures

cc: Mr. Tim Rogers, Wayne County Solid Waste Director
Mr. Wayne Sullivan, MESCO