



North Carolina Department of Environment and Natural Resources
Division of Waste Management

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

January 5, 2010

Mr. Greg Thomas
Solid Waste Director
Alamance County
2701 Austin Quarter Road
Graham, North Carolina 27253

Re: Methane Monitoring Plan Review
Inactive Closed MSWLF-Swepsonville
Alamance County, North Carolina
Permit No. 01-01
Doc ID No. 12612

Dear Mr. Thomas:

The Solid Waste Section (Section) has reviewed the Methane Monitoring Plan (DOC ID #12611) and the Methane Migration Monitoring Report (DOC ID #12610) for the Closed MSW Landfill in Alamance County submitted on your behalf by Municipal Engineering. The Section has several comments regarding the plan and report.

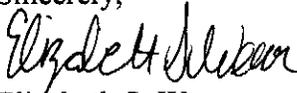
1. The monitoring plan does not match the monitoring report. Please refer to the Section's Landfill Gas Monitoring Guidance document for assistance in updating the plan, which should be submitted in pdf form.
http://portal.ncdenr.org/c/document_library/get_file?uuid=da699f7e-8c13-4249-9012-16af8aefdc7b&groupId=38361
2. There is no mention of what type of instrumentation will be used to measure the landfill gas in the monitoring plan. This information will need to be added to the plan. In addition, a copy of the instrument's manufacturer's manual and operations manual will need to be submitted with the updated monitoring plan.
3. There is no professional geologist seal on the monitoring plan or report.
4. Submit the well construction records for each new and old landfill gas monitoring well.
5. Chris Marriott performed a site inspection on December 21, 2010 and noted some of the landfill gas monitoring wells were not equipped with the required stopcock valve or similar. These wells will need to be retrofitted with a stopcock valve or similar.
6. The monitoring report indicates there are 21 landfill gas monitoring wells. Mr. Marriott did not see a well identified as well#21, but did see a well#22 during his inspection. According to the Methane Monitoring Probe Locations map, there is a well identified as

MP-21. Either update the map or change the well ID tag on the well itself so they both match.

7. The monitoring report indicated that methane monitoring was performed in five groundwater monitoring wells (MW-2, MW-4, MW-6, MW-7A and MW-8B). These readings will no longer be accepted by the Section. Alamance Co shall stop using these groundwater monitoring wells as methane monitoring points.
8. The monitoring report indicated that a flame ionization detector (FID) was used to measure the levels of landfill gas in the wells. A FID requires oxygen to keep the flame burning. If the flame burns out, the landfill gas readings will not be accurate. Please indicate how you verify there is enough oxygen to keep the flame lit.

If you have any questions, please do not hesitate to contact me via email Elizabeth.werner@ncdenr.gov or phone (919) 508-8496.

Sincerely,



Elizabeth S. Werner
Hydrogeologist
Solid Waste Section

cc: Jonathon Pfol, MESCO
Chris Marriott, SWS
Jason Watkins, SWS
Ed Mussler, SWS
Mark Poindexter, SWS