



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

September 17, 2007

Mr. Kevin Garon
Project Director
DuPont Corporate Remediation Group
6324 Fairview Road
Charlotte, North Carolina 28210

Re: DuPont Cape Fear Industrial Landfills (TPA, Ash, and Demolition)
Water Quality Monitoring Requirements
Permit #10-06

Dear Mr. Garon,

Per your written request dated May 16, 2007, water quality monitoring data for the Dupont Cape Fear Industrial Landfills (TPA, Ash, and Demolition) has been reviewed to determine if monitoring requirements at the three landfills can be reduced from semi-annual to annual, if MW-8 can be removed from the monitoring program, and if the target analyte list can be modified. The last review of the monitoring requirements was conducted on November 28, 2001 by Mr. Bobby Lutfy with the North Carolina Solid Waste Section, and the Solid Waste Permit was issued on August 13, 1984.

The Dupont Cape Fear Industrial Landfills consist of the TPA Landfill, Ash Landfill, and Demolition Landfill. Groundwater monitoring wells MW-1, MW-2, MW-3, MW-8, and MW-9 are associated with the TPA Landfill. Groundwater monitoring wells MW-4, MW-5, MW-6, and MW-7 are associated with the Ash Landfill. Groundwater monitoring wells MW-22, MW-23, and MW-24 are associated with the Demolition Landfill. Currently, all groundwater monitoring wells are being sampled on a semiannual basis.

The analytical lab reports indicate that metals, VOCs, and SVOCs have been detected in several monitoring wells above the 2L NC Groundwater Standards since closure of the three landfills and most recently as October 2006. The source of the metals has not been assessed, but these metals may be associated with the landfills and/or geology of the site. The VOCs and SVOCs are man-made and do not occur naturally so their source is most likely from the landfills.

The Solid Waste Section has determined that the monitor wells associated with the TPA Landfill, Ash Landfill, and Demolition Landfill should continue to be sampled for the same list of constituents as have been sampled in the past on an annual basis. The continued detection of various constituents in the target analyte list warrants its continued use to ensure that contaminant concentrations do not go undetected. Groundwater monitoring will be required at the site until there is no evidence that the landfill is affecting groundwater. However, the Solid Waste Section does approve the removal of MW-8 from the sampling program due to its location within the waste boundary. Monitor well MW-8 should not be abandoned, but should be properly secured to allow future sampling if deemed necessary.

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Please contact me at (919) 508-8520 or by e-mail at erwin.lane@ncmail.net if you have any questions or concerns regarding this letter. Thank you in advance for your anticipated cooperation in this manner.

Sincerely,



Ervin Lane
Compliance Hydrogeologist
Solid Waste Section

cc: Mark Poindexter, Field Operations Supervisor
Dennis Shackleford, Eastern Regional Supervisor
Ray Williams, Senior Environmental Specialist
Solid Waste Central Files