



Waste Industry Experts

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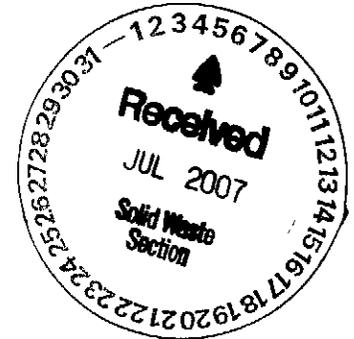
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June 27, 2007

Ms. Jackie Drummond
Division of Waste Management/Solid Waste Section
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

**RE: Granville County, Butner Landfill (Permit No. 39-02)
Initiation of Assessment of Corrective Measures
JEI Project No. 660.06, Task 01**



Dear Jackie:

On behalf of Granville County, Joyce Engineering, Inc. (JEI) is submitting this letter to document the initiation of an Assessment of Corrective Measures (ACM) for the closed Butner Landfill in Granville County, as required by North Carolina Solid Waste Management Rules *15A NCAC 13B .1635*.

Results of the second semiannual sampling event of 2006 at the Butner Landfill, which took place on December 28-29, 2006, indicated exceedances of NC-2L standards for 1,4-dichlorobenzene in monitoring wells MW-2R and MW-3R, vinyl chloride in MW-3R, and benzene in MW-2R. A resampling event was performed on February 23, 2007, and the results confirmed the NC-2L exceedances. The final laboratory report confirming the NC-2L exceedances was received March 30, 2007. A 14-day exceedance notification, based on preliminary results from the resampling event, was sent on March 28, 2007.

To meet the 90-day deadline for initiating the ACMs, Granville County and JEI met with DENR on June 14, 2007 to discuss a strategy for performing a Nature and Extent Study (NES) and an ACM for the Butner Landfill. This meeting was attended by Michelle Brown and Van Burbach of JEI, Jason Falls of Granville County, and Jackie Drummond of DENR. During that meeting, we discussed the plan to install one additional monitoring well (NES-1) near the facility boundary, downgradient of MW-2R and MW-3R. The well will be installed on the other side of the small creek that runs through the area. In addition, the surface water sample which is normally collected near this area will be moved to a location more directly down-gradient of MW-2R and MW-3R. We also discussed the remedial options for this site and the consensus was that monitored natural attenuation (MNA) is the preferred option, because the landfill is surrounded by state-owned property and there are no known human receptors.

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During the next semiannual sampling event, which is scheduled for July 2007, JEI will collect MNA parameters for the impacted wells (MW-2R and MW-3R), as well as for the site background well (MW-1A). Also during this event, JEI will examine the access issues related to installation of the proposed NES-1 well to determine whether it will be feasible to get a drilling rig to the proposed well site, or whether installing a well will be done using a hand-auger, portable power-auger, or a full-size drilling rig.

Please feel free to call Michelle Brown or me at (336) 323-0092 if you have any questions or concerns regarding the NES or ACM for the Butner Landfill. On behalf of Granville County, we thank you for meeting with us last week, and we look forward to working with you on the project.

Sincerely,
JOYCE ENGINEERING, INC.



Van Burbach, Ph.D., P.G.
Senior Project Consultant

C: Brian Alligood - Granville County Manager
Jason A. Falls - Environmental Officer, Granville County

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