



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

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

February 4, 2009

Mr. David Jones
Public Works Director
Post Office Box 543
Snow Hill, North Carolina 28580

Subject: Requirements for Final Corrective Action Plan, Financial Assurance for Corrective Action, and Permit for Continuing Operation
Greene County Landfill
Construction and Demolition Landfill atop MSW
Permit 40-02
Doc ID 9473

Dear Mr. Jones:

The SWS has not received a final Corrective Action Plan (CAP), financial assurance mechanism for a final CAP, and response to comments on the Permit Application for Continued Operation. A draft report (draft) for the Corrective Action Plan, dated July 21, 2009 (Doc ID 8747), had been received but not the final report the SWS requested in its letter, dated October 22, 2009 (Doc ID 7991). Municipal Engineering Services Company, P.A. (MESCO) submitted the draft. **A final CAP is required for compliance with Regulations 15A NCAC 13B .1637 and 15A NCAC 13B .0547 (4)(c).** In the draft, Monitored Natural Attenuation (MNA) is paired with Phytoremediation as remedies for contamination described in the Assessment of Corrective Measures (ACM), dated August 30, 2007 (Doc ID 8776). Cost of the final CAP remains to be fully addressed. Include the revised cost for corrective action in a final CAP. Submit both a hard copy and electronic copy of the final CAP within 30 days of the receipt of this letter.

Necessary are several revisions in the cost for the final CAP. One, include cost for the six (6) wells utilized for MNA as background, performance, and compliance groundwater wells. Two, include cost of monitoring and maintaining the *Explosive Gas Control Plan* (EGCP) specified in both the CAP and ACM for corrective action. Three, include cost for installation and management of the Phytoremediation paired with MNA. Four, correct the statement in Section 8.0 in the draft in which financial assurance for corrective action is reportedly achieved. Five, show the aforementioned costs for at least a duration of 30 years. Six, adjust the cost for inflation. Itemize and sum all costs in the final CAP.

The final CAP is also integral to the Permit for Continued Operation. Comments on the application for the Permit for Continued Operation are listed in the SWS letter, dated October 23, 2009 (Doc ID 8828). The SWS environmental engineer will review a revised application. Some, but not all, information to be included in the application is referenced to a final CAP, such as identification of MNA wells, stating of corrective action goals, enacting contingency plans, and

other information listed in permit special provisions. Submit both a hard copy and electronic copy of a revised application for the Permit for Continued Operation within 30 days of the receipt of this letter. Submit the information to Ming-Tai Chao. He can be contacted at 919-508-8507 or ming.chao@ncdenr.gov.

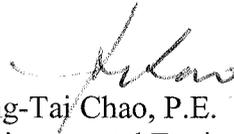
The SWS received a letter from the chief financial officer of Greene County, dated March 27, 2009, showing financial assurance for closure and post-closure but not for corrective action. **Financial assurance for corrective action is specified in Regulation 15A NCAC 13B .1628 (d).** Also note that in Regulation 15A NCAC 13B .1628 (d)(1)(A) is the specification that the cost estimate be adjusted for inflation. Within 30 days of receiving this letter, a revised financial assurance mechanism reflecting cost of the final CAP should be sent to Ms. Shawn McKee in the SWS. She can be contacted at 919-508-8512 or at shawn.mckee@ncdenr.gov.

For questions about the CAP or permit application, please contact Ming-Tai Chao at 919-508-8507 or ming.chao@ncdenr.gov or me at 919-508-8401 or zinith.barbee@ncdenr.gov.

Sincerely,



Zinith Barbee
Project Manager
Permitting Branch, Solid Waste Section



Ming-Tai Chao, P.E.
Environmental Engineer, II
Permitting Branch, Solid Waste Section

cc: Mark Poindexter	Field Operations Supervisor
Ed Mussler	Solid Waste Section
Donald Herndon	SWS
Shawn McKee	SWS
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Central File	