



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

October 30, 2008

Mr. Mike McFeeley, Landfill Manager
WCA of High Point C & D Landfill
5830 Riverdale Drive
Jamestown, NC 27282

RE: WCA of Highpoint C&D Landfill, Permit No. 41-16
Guilford County, North Carolina
Phase 2 Design Hydrogeologic Report and Water Quality Monitoring Plan
Document ID No. 6125

Dear Mr. McFeeley:

Revisions to the Design Hydrogeologic Report and Water Quality Monitoring Plan submitted by Golder Associates NC, Inc. in support of the application for Permit to Construct for the Phase 2 lateral expansion of a construction and demolition debris (C&D) landfill have been reviewed by the NC Solid Waste Section. The WCA of High Point C&D Landfill is located along Riverdale Drive in Guilford County and consists of approximately 154 acres, with 12 acres currently permitted as the Phase 1 waste unit. The proposed Phase 2 waste unit will be approximately 9.4 acres.

The Water Quality Monitoring Plan was amended to include two additional monitoring wells (MW-7S and MW-8) to monitor water quality associated with Phase 2. The existing monitoring well network consists of MW-1, MW-2, MW-3, MW-4S, MW-5 and MW-6. Deep wells MW-4D and MW-7D are monitored for water levels only. Monitoring well MW-1 is the facility's background compliance well. The four surface water sampling points, SW-1, SW-2, SW-3, and SW-4 were established during the Phase 1 investigation and will continue to be sampled on a semi-annual basis. The Design Hydrogeologic Report and the Water Quality Monitoring Plan meet the criteria required in 15A NCAC 13B .1623(b) and 15A NCAC 13B .1624(b)(4) and the NC Solid Waste Section approves this portion of the Permit to Construct application.

Any piezometers, groundwater monitoring wells, and borings, located in the proposed Phase 2 footprint may be abandoned now or after a Permit to Construct permit is issued by the Solid Waste Section. Please adhere to the following conditions:

Prior to construction of the new cells, all piezometers, groundwater monitoring wells and borings located in the proposed cells shall be properly abandoned by overdrilling first (except for non-cased borings) and sealed with grout in accordance with 15A NCAC 2C.0113(b)(1) entitled "Abandonment of Wells".

- a. In areas where soil is to be undercut, abandoned wells should not be grouted to pre-grade land surface, but to the proposed base grade surface to prevent having to cut excess grout and potentially damaging the wells.

b. Well abandonment records for each piezometer, groundwater monitoring well and boring shall be certified by the permit holder's geologist and submitted to the Solid Waste Section in accordance with 15A NCAC 02C.0114(b).

Construction Conditions to be included in the Permit to Construct:

The landfill owner's geologist shall examine the cell excavation and note any pertinent geologic features exposed during the construction process. The Solid Waste Section hydrogeologist shall be notified of these findings prior to placement of any liner materials.

The landfill owner's geologist shall be in the field to supervise all groundwater monitoring well installations. Any modifications to the approved water quality monitoring plan require approval by the Solid Waste Section hydrogeologist. Documentation of all changes to the approved plan shall be submitted with the well construction records.

For each well constructed, a well construction record, well schematic, boring log, and a description of well development activities shall be submitted to the Section within 30 days of well completion.

After well completion, provide a scaled map depicting the surveyed location of the new groundwater monitoring wells, existing groundwater monitoring wells, and abandoned groundwater monitoring wells.

Pre-Operational Conditions to be included in the Permit to Construct:

Groundwater monitoring wells and surface water sampling locations associated with the Phase 2 shall be sampled for the Appendix I constituent list prior to issuing the Permit to Operate.

In addition to a hard copy, please provide the Solid Waste Section with an electronic copy of the groundwater and surface water monitoring data collected at the landfill facility. Guidelines for groundwater and surface water sampling as well as submitting data electronically can be found at the Solid Waste Section's web site: http://wastenotnc.org/swhome/technical_assistance.asp

If you have any questions, please do not hesitate to call me at (919) 508-8506.

Sincerely,



Christine Ritter
Hydrogeologist
NC Solid Waste Section

Cc: David Reedy, Golder Associates NC, Inc.
Ed Mussler, Solid Waste Section
Pat Backus, Solid Waste Section
Hugh Jernigan, Solid Waste Section
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