



International Automotive Components

International Automotive Components Group North America, Inc.

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Permit No.	Date	Document ID No.
56-03	September 10, 2010	11557

Via e-mail (scanned copy)

September 8, 2010

Mr. Allen Gaither
North Carolina Dept. of Environment and Natural Resources
Asheville Regional Office
Division of Waste Management - Solid Waste Section
2090 U.S. 70 Highway
Swannanoa, NC 28778

RE: Financial Assurance Request
Collins and Aikman Industrial Landfill
McDowell County, Permit #56-03, Document ID No. 11245

Dear Mr. Gaither,

I would like to follow up on our teleconference which occurred August 25, 2010, International Automotive Components North America (IAC) has contracted RJN Environmental to prepare a work plan to meet the closure, post-closure, potential assessment, and corrective action costs documents identified in your August 3, 2010 request.

The following is a summary of activities that will be required in order to proceed with the permit transfer of the landfill located at 1240 Parker-Padgett Road, Old Fort, North Carolina.

This work plan is based on a review of the following:

- IAC file on the Subject Site, which mostly consists of documents transferred from Collins & Aikman during the acquisition of the Subject Site by IAC.
- Information collected by RJN during an October 2009 groundwater sampling event.
- An August 25, 2010 conference call with you, me, Bob Nowakowski of RJN, and Donald Herndon NCDNER Division of Waste Management.

Closure Plan and a Post-Closure Plan

Prior to the preparation of the Closure and Post-Closure Plans, RJN will complete a sub-surface assessment of the landfill to determine the level of corrective action required post site closure. The subsurface investigation is necessary to:

- determine whether or not methane (and other gases) are present, and at what levels;
- verify the content of the landfill, and;
- estimate the volume and dimensions of the landfill

Scope of Work –RJN Project

The scope of work identified in RJN Project # 010059.01 Work plan for Landfill Investigation / Closure Plan /Post Closure Plan is as follows.

- RJN will monitor the advancement of approximately 40 soil borings placed throughout the landfill area to: 1.) the depth of the landfill at each location, and; 2) to collect representative soil samples for laboratory analysis to document the nature of the materials within the landfill. At no time will RJN pierce the clay lining beneath the landfill. A North Carolina certified well driller will be contracted to advance the soil borings.
- A four-inch monitoring well will be located within the middle interior of the landfill to monitor for soil gases. This monitoring well will be set on top of the confining clay layer, and will be screened to within 10 feet of the surface. The actual depth of this monitoring well is not known at this time so it will be determined in the field. Field gas measurements will be made subsequent to the installation. In addition, field gas measurements will be collected at least daily for the duration of the field event. If measurable levels of gases are recorded, RJN personnel will collect data on a daily basis tapering down to a weekly basis.
- During the advancement of soil borings, soil samples will be collected at five foot intervals to get a near continuous soil profile. Each of these soil samples will be analyzed in the field with a photo ionization detector (PID) and a methane meter to measure the level of organic gases and flammable gases in the soil. These results will be used to select soil samples for laboratory analysis.
- Selected soil and/or groundwater samples will be analyzed for VOCs by USEPA Method 8260, SVOCs by USEPA Method 8270; and RCRA 8 Metals by USEPA Methods 6010 and 7470. In addition, a selected number of soil samples will be subjected to toxicity characteristic leachate procedure (TCLP), that will mimic landfill conditions over time.
- The surface level at each soil boring location will be surveyed onto a site plan. Knowing the relative elevations of each soil boring will allow RJN to construct a 3-D model of the landfill and to accurately calculate the volumes of landfill waste that are present.
- To aid in data analysis, the existing Subject Site monitoring wells will be sampled. RJN will collect static elevations and collect a round of groundwater samples. Each well will be tested for organic vapors with a photo-ionization detector (PID), and each of the groundwater samples will be field tested for temperature, pH, oxygen, and conductivity. Collected groundwater samples will be analyzed for RCRA 8 Metals by USEPA Methods 6010 and 7470.

Upon receipt of the analytical data, RJN will prepare a Site Activities Report for IAC. The Site Activities Report will be used to prepare a "Closure Plan" and a "Post Closure Plan". These plans will be forwarded to you.



Closure, Post-Closure Plan Schedule

- RJN will require 2 months to plan for and execute the field work
- Sample analysis will require an additional 2 weeks
- The Site Activities Report will be completed in an additional 1 month
- The Closure Plan and Post Closure Plan will be completed in an additional 2 months

Potential Assessment and Corrective Action Costs

Much of the information needed to complete the cost analysis for this requirement will be ascertained from the site assessment process. Once the Closure, Post Closure Plan is submitted, IAC will prepare and submit this risk analysis to NCDNER within a reasonable time period.

Allen, if you have any questions or comments regarding this approach to meet the requirements of your August 3, 2010 request, please let me know by phone at (313) 240-3345, or by e-mail at pkresnak@iacna.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Pat Kresnak", written over a light blue horizontal line.

Pat Kresnak
International Automotive Components,
North America

C: Bob Nowakowski, RJN Environmental