



February 7, 2011

Ms. Jaclynn Drummond  
Hydrogeologist  
NCDENR Division of Waste Management – Solid Waste Section  
1646 Mail Service Center  
Raleigh, North Carolina 27699-1646

**RE: Request for Abandonment of Monitoring Wells (MW-12 and MW-13)  
Red Rock C&D Landfill  
Holly Springs, North Carolian**

Dear Ms. Drummond:

Richardson Smith Gardner and Associates, Inc. (RSG) is submitting this request for groundwater monitoring network modification at the Red Rock C&D Landfill (Permit Number 92-28) on behalf of Waste Industries, Inc. The groundwater monitoring network at the Red Rock Landfill consists of 10 groundwater monitoring well and two wells that are used to collect water level information only. A map depicting the current groundwater monitoring network is included as **Figure 1**.

Of the 10 wells that are actively monitored MW-10 is considered the upgradient/background well for the site, however, three additional wells are also located hydraulically upgradient of the waste disposal cell (MW-11, MW-12 and MW-13). During permitting of the site, there was some question regarding long term groundwater flow direction. Semi-annual monitoring since that time has indicated that groundwater flow is to the south/southeast toward Jim Branch. Based upon this data, wells MW-11 through MW-13 are upgradient of the waste disposal area. Therefore, we request to modify the groundwater monitoring network for the site to reduce the redundancy of upgradient monitoring.

#### Proposed Monitoring Network Changes

Monitoring well MW-13 at this landfill is located upgradient of the landfill activities, and in an area for future landfill cell development. Currently the area around this well is being used for borrow activities. Additionally, monitoring well MW-12 is located upgradient of the landfill and immediately adjacent to the existing landfill cell. We request to remove MW-13 from the groundwater monitoring network and abandon this well in accordance with 15A NCAC 2C.0113. We further request to remove monitoring well MW-12 from the monitoring network, but maintain this well as a location for water level measurements as a part of the normal semi-annual monitoring of the site.

#### Abandon MW-13

Upon approval of this request, RSG will oversee removal of MW-13. Monitoring well MW-13 is located in the future Phase 2 landfill footprint, therefore, a subcontracted drilling firm will

over-ream the well borehole and backfill the borehole to the limit of proposed excavation in this area.

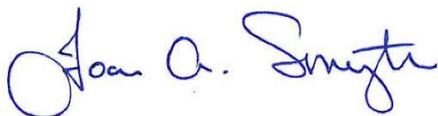
Monitoring well MW-12 will remain in place, however, this well will only be used for water level measurements during future semi-annual monitoring events.

Letter Report and Revision of Water Quality Monitoring Plan

Upon completion of the abandonment of MW-13, RSG will revise the Water Quality Monitoring Plan (WQMP) for the site to remove all references to this well and remove the monitoring requirement for MW-12 (except for water level data). This plan will be prepared in accordance with NCDENR water quality monitoring guidance and applicable rules. Additionally, a letter report summarizing all well abandonment activities will be submitted to NCDENR.

The site is scheduled for a March 2011 groundwater monitoring event. We request to have approval for the well abandonment prior to the next sampling event so these wells will not be needlessly sampled. Please contact me at 919-828-0577 x 221 or by e-mail below, if you have any questions or require additional information.

Sincerely,  
**Richardson Smith Gardner and Associates, Inc.**

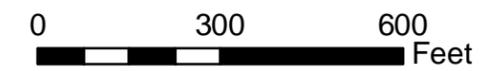


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attachment

CC: Don Plessinger - WI  
File

**Figure**



**REFERENCES:**  
 1. PHOTOGRAPHY FROM AN AERIAL SURVEY DATED FEBRUARY 11, 2010 BY GEODATA CORPORATION, ZEBULON, NC.



FIGURE NO.	1
SCALE:	AS SHOWN
CHECKED BY:	J.A.S.
PROJECT NO.	RED ROCK 11-1
FILE NAME	REDROCK-B0109
DRAWN BY:	C.T.J.
DATE:	FEB. 2011

**TITLE:**  
**RED ROCK DISPOSAL, LLC**  
**C&D LANDFILL**  
**GROUNDWATER FLOW DIRECTION**