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NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT

May 17, 1999



JAMES B. HUNT JR.
GOVERNOR

WAYNE McDEVITT
SECRETARY

WILLIAM L. MEYER
DIRECTOR

Mr. Lloyd Cook
Wayne County Solid Waste Director
460B Landfill Road
Dudley, North Carolina 28333

RE: Adjustment of Assessment Monitoring Requirements - Wayne County Landfill, Dudley Site (Permit # 96-01)

Dear Mr. Cook:

The Solid Waste Section has reviewed the request to revise the list of analytical parameters for selected groundwater monitoring wells under the assessment monitoring program at the Wayne County landfill. The request was submitted by Municipal Engineering Services Company, P.A. on behalf of Wayne County. Specifically, the County has requested that monitoring wells MW-1, MW-3, and MW-5 be excluded from the Appendix II sampling requirements.

As allowed by 15A NCAC 13B .1634 (b) the Solid Waste Section conditionally approves the removal of these wells from current sampling requirements for the Appendix II list of parameters. However the wells must be sampled semi-annually for the Appendix I list. If future sampling and analysis discovers Appendix I constituents in any of the individual wells at concentrations that meet Rule .1634 (a), the affected well(s) must be returned to assessment monitoring requirements. The modified sampling requirements at these wells or other wells does not absolve the Wayne County landfill from any water quality monitoring requirements specified in 15A NCAC 13B Solid Waste Management Rules.

The remaining monitoring wells are required to continue under the assessment monitoring program and will be sampled per requirements.

If you have any questions, please call me at (919) 733-0692, extension 257.

Sincerely,

Larry Rose
Larry Rose

Environmental Specialist
Solid Waste Section

cc: Phil Prete - Head, Field Operations Branch
Terry Dover - Eastern Area Supervisor
Bobby Nelms - Waste Management Specialist
James A. Skimmer, Jr. - Municipal Engineering Services Co., P.A.

State of North Carolina
Department of Environment
and Natural Resources
Washington Regional Office

James B. Hunt, Jr., Governor
Wayne McDevitt, Secretary

**Division of Waste Management
Solid Waste Section**

April 12, 1999

Mr. Will R. Sullivan, Manager
County of Wayne
Post Office Box 227
Goldsboro, NC 27533



RE: File Closing
Wayne Co. MSW LF, Permit # 96-01
Notice of Violation

Dear Mr. Sullivan:

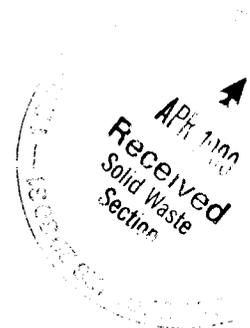
On April 6, 1999, I conducted a compliance inspection of the Wayne County Municipal Solid Waste Landfill, Permit # 96-01, located off State Road 1129, southwest of Goldsboro, Wayne County, North Carolina. At the time of my inspection, it appeared as if all violations had been corrected as requested in the Notice of Violation issued to you on June 17, 1998.

This letter serves to confirm that the requirements of the Notice of Violation have been satisfied and the violations corrected. Thank you for your cooperation in this matter. If you should have any questions or require my assistance in the future, please do not hesitate to call me at (252) 946-6481 ext. 272.

Sincerely,

Chuck Boyette
Waste Management Specialist

cc: James C. Coffey
Philip J. Prete
Terry Dover
Lloyd Cook



OPERATION/CONSTRUCTION MANAGERS

**Municipal
Services**

PO Box 97, Garner, North Carolina 27529 (919) 772-5393



CIVIL/SANITARY ENGINEERS

**Engineering
Company, P.A.**

PO Box 349, Boone, North Carolina 28607 (828) 262-1767

March 22, 1999

Mr. Larry Rose
Solid Waste Section
Division of Waste Management
North Carolina Department of Environment
and Natural Resources
401 Oberlin Road
Raleigh, NC 27605



Re: Assessment Monitoring Revisions
Wayne County Groundwater Monitoring Plan

Mr. Rose:

This letter was drafted in response to a Solid Waste Section memorandum dated January 21, 1999, concerning the determination of "an appropriate subset of monitoring wells" to be sampled during assessment monitoring.

The closed Wayne County Sanitary Landfill (Dudley) has drawn and analyzed four sets of Appendix II data for every groundwater monitoring well in the Sampling and Analysis Plan. After reviewing all Appendix I and II data, it appears downgradient wells MW-3 and MW-5 and upgradient well MW-1 are possible candidates for removal from Appendix II sampling as discussed below.

MW-3 has historically indicated only three metal constituents: Cadmium, Chromium, and Lead. The only Lead detection occurred during the February, 1997 sampling event at 0.018 ug/L which is 0.003 units above North Carolina Groundwater Standard (Standard). All remaining metal detections have been below Standard throughout sampling history. No Volatile Organic Compounds (VOC's) have ever been detected at this location.

MW-5 has historically indicated several metal constituents. Cadmium, Chromium, and Lead were all detected outside Standard during the July, 1995 sampling event. In general, this date reflects an extreme high in the sampling history for this particular location. Time-Series Plots for these constituents indicate this date as a sharp peak with all remaining dates falling substantially lower or not detected at all. The anomalous nature of the July,

1995 event needs to be considered when reviewing the assessment monitoring plan. No VOC's have ever been detected at this location.

MW-1 is located approximately 50 feet from the waste boundary and is the upgradient well for the site. This well has shown only two detections throughout sampling history. Both detections were for Zinc and occurred in September, 1994 and October, 1994. Both detections were well below Standard. Bis (2-ethylhexyl) phthalate was detected in March, 1998. This chemical is used in the manufacturing of plastics and is a component of many household, automotive, medical, and packaging products. The use of this chemical and single occurrence in an *upgradient* well indicates possible contamination during the sampling procedure. This chemical has not been detected at any other location within this site.

After considering historical metal detections and Time-Series interpretations, Municipal Engineering Services Co. P.A. suggests the suspension of Appendix II sampling of MW-1, MW-3, and MW-5 for the Closed Wayne County Sanitary Landfill. In accordance with 15A NCAC 13B .1634 (b), these wells will continue to be sampled semi-annually for the Appendix I list. The remaining wells in the Monitoring Plan will continue the program of semi-annual assessment monitoring.

Enclosed you will find a Historical Result Report outlining all detections at all wells within the Monitoring Plan. In addition, Time-Series Plots have been included displaying historical detections at MW-1, MW-3, and MW-5.

Please review and respond to the above proposal. Should you have any questions, please contact me at (919) 772-5393.

Best Regards,
MUNICIPAL ENGINEERING SERVICES CO., P.A.



James A Skinner, Jr.

Enclosures

Cc: Mr. Lloyd Cook