



North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor
Dee Freeman, Secretary

September 9, 2010

Sent Via U.S. Mail and Via Email – Tim.Rogers@waynegov.com

Mr. Tim Rogers
Wayne County Solid Waste Director
460 B South Landfill Road
Dudley, NC 28333

**Re: *Potentially Impacted Soil and Groundwater Assessment*
Wayne County C&D Over MSW Landfill, Permit #96-01**

Dear Mr. Rogers:

The Solid Waste Section has completed a review of the *Potentially Impacted Soil and Groundwater Assessment* dated August 26, 2010 and submitted on behalf of Wayne County by Municipal Engineering Services Company, P.A. The *Potentially Impacted Soil and Groundwater Assessment* was submitted pursuant to a Compliance Order With Administrative Penalty issued by the Division of Waste Management, Solid Waste Section on July 16, 2010.

The *Potentially Impacted Soil and Groundwater Assessment* was submitted to the Solid Waste Section to evaluate the extent of the environmental impacts from the leachate release. The *Potentially Impacted Soil and Groundwater Assessment* consists of soil, groundwater, and surface water sampling. Potentially impacted soils will be identified by a hand auger at specific locations (as described on Plate 1) and field screened with a photo-ionization detector (PID). The total number of soil samples will be determined in the field. A background soil sample will also be collected and field screened to characterize the baseline concentrations at the facility.

Per the *Potentially Impacted Soil and Groundwater Assessment*, the following samples will be collected and analyzed: (1) soil samples will be analyzed for Appendix I Volatile Organics and Metals; (2) groundwater samples will be collected from groundwater monitoring wells MW-2, MW-3, MW-5 and MW-7, and analyzed for Appendix I of 40 CFR 258; and (3) surface water samples will be collected from surface water sampling locations SW-1, SW-2 and the surface water feature near MW-3, north of the C&D landfill. Surface water samples will also be analyzed for Appendix I of 40 CFR 258.

As a result, the *Potentially Impacted Soil and Groundwater Assessment* is approved with the following conditions that are consistent with all leachate release assessments at NC solid waste management facilities and NC transfer stations:

1. Please also analyze the soil samples for Nitrate-Nitrite, Phosphorus, Sulfate, Percent Solids, and pH. Please compare the analytical soil sampling results to NCDENR's *Inactive Hazardous Sites Branch Soil Remediation Goals October 2009*;
2. Please also analyze the groundwater and surface water samples for Nitrate-Nitrite, Phosphorus, BOD, COD, Sulfate, and Total Suspended Solids. Field parameters should also be measured for all groundwater and surface water samples that are collected;

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- 2 Please use a NC certified laboratory that is capable of reporting all constituent concentrations at or below the designated Solid Waste Section Limits (SWSLs);
- 3 Please note that analytical results from NC certified laboratories that continue to attribute common landfill leachate constituents to lab contamination will not be accepted;
- 4 Please include the Electronic Data Deliverables (EDDs) for all sampling results using the current template established by the Solid Waste Section; and
- 5 Please include within the summary report a comparison groundwater and surface water table using the most recent groundwater monitoring and surface water monitoring results.

Within 10 days of receipt of this letter, please implement the *Potentially Impacted Soil and Groundwater Assessment*. Once all sampling results have been received from the laboratory, within 30 days, please submit a summary report to the Solid Waste Section. Based upon the results of the initial assessment activities, additional assessment, installation of additional groundwater monitoring wells, excavation of impacted soils, and/or corrective action may be required.

If you have any questions or concerns regarding this letter, please contact me at 919-508-8500 or at jaclynne.drummond@ncdenr.gov. Thank you for your anticipated cooperation with this matter.

Sincerely,



Jaclynne Drummond
Hydrogeologist
Environmental Compliance
Solid Waste Section

cc via email: William "Lee" Smith, III, Wayne County Manager (County.Manager@waynegov.com)
Mark Poindexter, Solid Waste Field Operations Supervisor
Dennis Shackelford, Solid Waste Eastern District Supervisor
Wes Hare, Solid Waste Environmental Senior Specialist
Zinith Barbee, Solid Waste Permitting Hydrogeologist