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May 5, 2008

Mr. Brian Wootton
Hydrogeologist, Solid Waste Section
North Carolina Department of Environment and Natural Resources
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Subject: Landfill Expansion/Permit Modification
Louisiana-Pacific Corporation (L-P)
Roaring River, North Carolina
Permit No. 97-03



Reference: Additional Information Request, March 6, 2008

Dear Mr. Wootton:

The purpose of this letter is to respond to questions and comments that were made in your above-referenced letter. Your comments, shown in **bold**, are followed by our response or clarification.

- 1. Has groundwater monitoring well, FA-1 been properly abandoned (sealed by having the casing removed and re-grouted)?**

Response: FA-1 has not yet been properly abandoned. Prior to any construction associated with the landfill expansion, a well abandonment form (GW-30) will be submitted for monitoring well FA-1. Once approved, the well will be abandoned in place by grouting the casings from the bottom up with neat cement using a tremie. After placement of the grout, the surface completion (concrete pad and protective casing) will be removed and the well casings will be cut off below the land surface. The land surface will then be restored to normal grade. Well abandonment activities will be performed by a North Carolina licensed well driller in accordance with North Carolina standards.

- 2. Please modify Drawing No. 1 to include the location of the surface water sampling location.**

Response: Drawing No. 1 has been modified to include the surface water sampling location and is provided in Attachment 1 for your review.

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Mr. Brian Wootton
North Carolina Department of Environment and Natural Resources
May 5, 2008
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- Please revise and submit the water quality monitoring plan to reflect the field measurements and constituents mentioned in the letter by Cheryl Marks (dated 10/27/99) and also add the constituents, zinc and boron to the semi-annual sampling program obtained from existing groundwater monitoring wells, FA-2, FA-3, and FA-4 and the surface water sampling point of the stream. The revised water quality plan needs to be signed and sealed by a licensed geologist or professional engineer.***

Response: Zinc and boron have been added to the semiannual sampling program for monitoring wells FA-2, FA-3, FA-4, and the surface water sampling point. Furthermore, language has been added to the existing groundwater monitoring plan regarding the addition of zinc borate sludge (at appropriate mix and add ratios) to the ash mixtures. The amended groundwater monitoring plan has signed and sealed by Mr. Nilsson and is provided in Attachment 2 for your review.

In addition, per your request, RMT has compiled and provided as Attachment 3 previous submittals and correspondences to facilitate your review and to ensure completeness.

We trust this provides the information needed at this time. Please feel free to contact me if you should need any further clarification.

Sincerely,

RMT North Carolina, Inc.



R. Kent Nilsson, P.E.

Project Engineer

Attachments

cc: Phil Sparks, L-P (2 copies)
John L. Hospodar, RMT (1 copy)
Travis Tarbet, RMT
Central Files

Attachment 1

Drawing No. 1

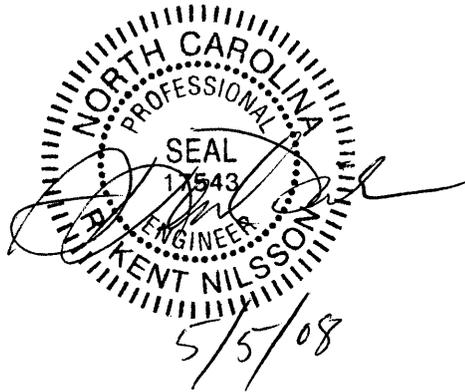
Attachment 2
Amended Water Quality Monitoring Plan

Water Quality Monitoring Plan

The following groundwater monitoring plan was taken from the original landfill permit submitted by Joyce Engineering, Inc, *ABTco, Inc. Landfill Design Plan, November 24, 1997*. Changes to the proposed groundwater monitoring plan were based on a letter dated March 6, 2008, from Mr. Brian Wootton, a hydrogeologist with the NC DENR Solid Waste Section, to Mr. Kent Nilsson, PE with RMT.

Proposed Monitoring Program

Based on the letter by Cheryl Marks of the Solid Waste Section dated October 7, 1999, the groundwater samples and surface water sample should be analyzed for the field parameters of Temperature, pH, turbidity, and specific conductivity as well as total dissolved solids, RCRA metals, Chloride, zinc, and boron. The monitoring should take place on a semi-annual basis. Monitoring well FA-1 is no longer in use, and has been replaced by monitoring well FA-4, and monitoring well FA-3 has been added since the initial groundwater monitoring plan was completed. Monitoring wells FA-2, FA-3, FA-4 and the surface water monitoring station located at the intermittent stream (Site 4) will be sampled as noted above as a part of this plan.



Attachment 3

Previous Submittals and Correspondence



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

March 6, 2008

Mr. Kent Nilsson, P.E.
RMT North Carolina, Inc.
30 Patewood Drive, Suite 100
Greenville, SC 29615-3535

RE: Landfill Expansion/ Permit Modification
Louisiana-Pacific Corporation
Roaring River, NC
Industrial Landfill expansion
Wilkes County, NC
Second Additional Information Request
Permit No. 97-03
Tracking #4115

Dear Mr. Nilsson:

The above referenced Landfill Expansion /Permit Modification (from an existing 5 acre footprint to a landfill that covers approximately 7 acres) is being reviewed by the Solid Waste Section (SWS) for hydrogeologic concerns. The SWS received the initial application on July 17, 2007. Additional information was requested by the Solid Waste Section (SWS) on October 10, 2007. The modified permit application and additional information response was received by the SWS on February 21, 2008. There are several items in the revised application and initial application that require clarification and/or revision before the hydrogeologic review can be completed. Please respond to the following questions and comments.

RMT Report (February 13, 2008)

Drawing No. 1 – Monitoring Well Locations and Inferred Groundwater Contours

The Drawing depicts the locations of groundwater monitoring wells FA-1, FA-2, FA-3, and FA-4. Reports for the last several years, pertaining to groundwater sampling results state that groundwater monitoring well, FA-1 is no longer being sampled and was replaced by another upgradient well, FA-4. Has groundwater monitoring well, FA-1 been properly abandoned (sealed by having the casing removed and re-grouted)? If not, then this former well will need to be properly abandoned and a well abandonment form (GW-30 form) will need to be submitted before landfill construction activities commence for this expansion. Well abandonment form(s) can be downloaded from the following web site.
<http://h2o.enr.state.nc.us/aps/gpu/documents/GW-30rev5-19-06.pdf>

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Also, some of the historical sampling reports show that periodic sampling of the stream ("Site 4") has occurred when water is present in the stream. Please modify Drawing No. 1 to include the location of the surface water sampling location.

*RMT Report (February 13, 2008)
Letter from NC DENR – Water Quality Monitoring (by Cheryl Marks – 10/27/99)*

Page 1 of 2 of the letter by Cheryl Marks of the Solid Waste Section (the letter is included in the last section of the permit application), states in the last paragraph, in-part, the following: *"The sampling results verify no volatile or semi-volatile organics in the groundwater. Metal constituents detected are within acceptable groundwater standards. These results allow for modification for future sampling events. Typically a minimum of four monitoring events is required to develop an initial water quality history. Continue to include the following analysis: Field measurements – Temperature, pH, turbidity, and specific conductivity, and total dissolved solids, RCRA metals, and Chloride".*

*RMT Report (July 2007)
Section 1 - Background*

Page 1 of Section 1 of the July 2007 RMT Report mentions that *"zinc borate sludge will be added to the ash mixture at a 3:1 sludge to ash weight ratio, with an average of 2:1 sludge to ash being placed in the landfill."*

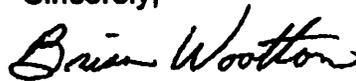
Please revise and submit the water quality monitoring plan to reflect the field measurements and constituents mentioned in the letter by Cheryl Marks, stated above (dated the 10/27/99) and also add the constituents, zinc and boron to the semi-annual sampling program obtained from existing groundwater monitoring wells, FA-2, FA-3, and FA-4 and the surface water sampling point of the stream. The revised water quality plan needs to be signed and sealed by a licensed geologist or professional engineer.

=====

Kent Nilsson, P.E.
Louisiana-Pacific Corp.
Landfill Expansion/Permit Modification
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Please note the comments and questions mentioned above and provide additional information and revisions as needed. If you have any questions, or wish to schedule a meeting to discuss the items referenced in this letter, please call me at (919) -508-8524.

Sincerely,



Brian Wootton
Hydrogeologist
Solid Waste Section

cc: Ed Mussler
Larry Frost
Central Files

Solid Waste Section
Solid Waste Section