



North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor
Dee Freeman, Secretary

March 22, 2012

Sent Via Email – John.Roberson@wakegov.com

Mr. John Roberson
Wake County Solid Waste Management Director
P.O. Box 550
Raleigh, NC 27602

Re: *Closed North Wake Unlined Landfill Semi-Annual Sampling Report (November 2011 Sampling)*
Appendix II Parameter Request
Closed North Wake Unlined Landfill
Solid Waste Permit Number 92-09
DIN 16337

Dear Mr. Roberson:

The Solid Waste Section has completed a review of the *North Wake Unlined Landfill Facility Permit No. 92-09 Semi-Annual Sampling Report (November 2011 Sampling Event)* dated December 13, 2011 (DIN 16294) and submitted on behalf of Wake County by CDM Smith for the North Wake Unlined Landfill. Wake County is currently implementing groundwater corrective action at the North Wake Unlined Landfill. Wake County had selected monitored natural attenuation (MNA), in-situ remediation by air sparging, landfill gas recovery, and institutional controls as the remedy to restore groundwater quality at and beyond the relevant point of compliance, to effectively reduce the groundwater contamination at the solid waste management facility, and to control the migration of contaminated groundwater to prevent unacceptable impacts to the adjacent surface waters. The Solid Waste Section approved the County's selected remedy on December 18, 2009 (DIN 9076), and the County's *Corrective Action Plan* dated March 22, 2010 (DIN 10213) on April 29, 2010 (DIN 10469).

Within the *North Wake Unlined Landfill Facility Permit No. 92-09 Semi-Annual Sampling Report (November 2011 Sampling Event)*, Wake County is requesting that the sampling of the pesticides and herbicides during the annual Spring Appendix II water quality monitoring events be discontinued as the pesticides and herbicides have not been detected within any of the groundwater monitoring wells since March 2009.

Per the *North Wake Unlined Landfill Facility Permit No. 92-09 Semi-Annual Sampling Report (November 2011 Sampling Event)*, in addition to previous inconsistent estimated concentration detections and recent non-detections, the historical pesticide and herbicide detections are likely false positives and should not have been reported. Wake County believes that the detections are not representative of the actual groundwater conditions at the solid waste management facility, and therefore should no longer be sampled.

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Also, Wake County is requesting to discontinue the remaining Appendix II semi-volatile organic compound (SVOC) constituent sampling as required by the Solid Waste Section within the October 3, 2008 letter (DIN 5937). No semi-volatile organic compounds have been detected within any of the groundwater monitoring wells since May 2008. The only exception was a recent estimated detection of bis(2-ethylhexyl) phthalate within groundwater monitoring well MW-29D at 1.8 ug/L in March 2011 (the 2L Groundwater Standard is 3 ug/L).

As a result, the Appendix II parameter request within the *North Wake Unlined Landfill Facility Permit No. 92-09 Semi-Annual Sampling Report (November 2011 Sampling Event)* is approved as described with one exception. Based upon the recent detection of bis(2-ethylhexyl) phthalate within groundwater monitoring well MW-29D during the March 2011 water quality monitoring event, please continue to analyze for this constituent within MW-29D.

If you have any questions or concerns regarding this letter, please contact me at 919-707-8294 or by email at jaclynne.drummond@ncdenr.gov. Thank you again for your continued cooperation with groundwater corrective action at this solid waste management facility.

Sincerely,



Jaclynne Drummond
Compliance Hydrogeologist
Solid Waste Section

cc via email: Mark Poindexter, Field Operations Supervisor
Dennis Shackelford, Eastern District Supervisor
Shawn McKee, Environmental Senior Specialist
Elliott Cornell, Wake County
Matt Roylance, Wake County