



North Carolina Department of Environment and Natural Resources  
Division of Waste Management

Beverly Eaves Perdue  
Governor

Dexter R. Matthews  
Director

Dee Freeman  
Secretary

September 20, 2012

Ms. Linda Fogleman  
Fogleman and Fogleman Landfill and Recycling Facility – LCID Landfill and Processing Facility  
4005 Intermere Road  
Durham, NC 27704

Re: Stockpiled Soil Investigation  
Fogleman and Fogleman LCID Landfill, Permit #32F

Dear Ms. Fogleman:

The Solid Waste Section has reviewed the *Stockpiled Soil Investigation* submitted by Smith Gardner, Inc. (S+G) on September 12, 2012. The investigation proposal was submitted in response to the discovery that soils stockpiled at the facility and subsequently used as backfill at a NC DENR DCSA remediation site were contaminated with petroleum. S+G has proposed to assess the stockpile using test pits and a photoionization detector (PID). The stockpile dimensions are approximately 40 feet by 80 feet with a thickness ranging from 12 feet to 0 feet. S+G proposed to excavate eight test pits within the stockpile and scan soil samples from each test pit every two feet in depth with a PID. Areas with high petroleum concentrations based on PID results will be flagged for removal. S+G also proposed to submit four soil samples for laboratory analysis of Total Petroleum Hydrocarbons (TPH) Diesel Range Organics (DRO) and Gasoline Range Organics (GRO). One soil sample will be collected from an area impacted by petroleum and the remaining three samples will be collected from areas that appear to have no impact. S+G will use the PID and laboratory results to determine which soils to remove from the site and send to a remediation company.

Additional soils were sampled from the NC DENR DCSA site on September 13, 2012. The soil analytical results reported the detection of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), TPH, and metals. In order to determine if certain contaminants found in soil samples collected from the DCSA site originated from the stockpile at the Fogleman LCID Landfill or if cross contamination occurred after the soil was used as backfill at the DCSA remediation site, soils from the stockpile should be analyzed for VOCs by EPA Method 8260, SVOCs by EPA Method 8270, MADEP VPH & EPH, and 8 RCRA Metals instead of TPH DRO and TPH GRO. S+G should also collect two additional soil samples for laboratory analysis from areas of petroleum impact in order to have additional representative soil samples to use for data comparison. S+G stated that the stockpile was placed upon weathered bedrock and if there are any areas of the stockpile that are discovered to not be underlain by weathered bedrock during soil removal, a confirmatory soil sample must be collected to ensure that no impacted soil remains onsite. Based on the soil analytical results, the Section may also require the installation of a monitoring well to assess groundwater impact. The Section approves the investigation and remediation plan and S+G may proceed with implementation under the conditions previously mentioned in this paragraph.

Please contact me at (919) 707-8288 or by e-mail at [ervin.lane@ncdenr.gov](mailto:ervin.lane@ncdenr.gov) if you have any questions or concerns regarding this letter. Thank you in advance for your cooperation in this manner.

Sincerely,



Ervin Lane  
Compliance Hydrogeologist  
Solid Waste Section

cc: Joan Smyth, P.G., Smith Gardner, Inc.  
Wayne Randolph, UST Section Hydrogeologist  
Michael Scott, Solid Waste Section Chief  
Ed Mussler, P.E., Permitting Branch Head  
Mark Poindexter, Field Operations Branch Head  
Dennis Shackelford, Eastern District Supervisor  
John Patrone, Environmental Senior Specialist  
Solid Waste Central Files