



North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor  
Dee Freeman, Secretary

October 4, 2012

Sent Via Email - ejerecycle@yahoo.com

Mr. Judson Whitehurst  
C&D Landfill, Inc.  
802 Recycling Lane  
Greenville, NC 27834

Re: *Water Quality Monitoring Report: Assessment & Detection Monitoring  
May & November 2011*  
C&D Landfill, Inc. Phase 1  
Pitt County, Solid Waste Section Permit Number 74-07  
DIN 17354

Dear Mr. Whitehurst:

The Solid Waste Section has completed a review of the *Water Quality Monitoring Report: Assessment and Detection Monitoring May and November 2011* dated April 30, 2012 (DIN 17293) and submitted on your behalf by David Garrett & Associates for the C&D Landfill, Inc. Phase 1 facility. This facility is currently conducting Assessment Monitoring in accordance with 15A NCAC 13B .0545.

A request was provided within the *Water Quality Monitoring Report: Assessment and Detection Monitoring May and November 2011* to cease Assessment Monitoring and return to Detection Monitoring for the groundwater monitoring wells MW-3S, MW-3A, and MW-8. Pursuant to 15A NCAC 13B .0545(b)(9), the Division may give approval to the owner or operator to return to Detection Monitoring if:

- (A) The concentrations of the constituents are shown to be at or below background values and 15A NCAC 02L .0202 for two consecutive sampling events;
- (B) The plume is not migrating horizontally or vertically; and
- (C) The plume has not exceeded the compliance boundary.

To date, the Solid Waste Section has not received the May 2012 water quality monitoring report so those analytical results were not included within this review. Based upon a review of the *Water Quality Monitoring Report: Assessment and Detection Monitoring May and November 2011*, previously submitted semiannual water quality monitoring reports for this facility, the *Updated Water Quality Monitoring Plan* dated September 2007, and the *Ground Water Assessment Work Plan – Revised* (DIN 7829) dated June 22, 2009, groundwater monitoring well MW-3S has had consistent groundwater exceedances of Benzene, an Appendix I volatile organic compound, since the groundwater monitoring well was installed in 2007. Groundwater monitoring well MW-3S replaced groundwater monitoring well MW-9S as approved by the Permitting Branch within the Solid Waste

1

Section on July 23, 2007. Other Appendix I constituents and Tetrahydrofuran have been detected at the facility's groundwater monitoring wells. No Appendix II constituents were detected at concentrations exceeding the NC groundwater standards during the past four Assessment Monitoring events submitted to the Solid Waste Section. However, Appendix II constituents are still being detected at the facility. Mercury was detected within groundwater monitoring well MW-3A in May and November 2011 and within groundwater monitoring well MW-8 in May 2011. Tin has been detected within groundwater monitoring wells MW-3S, MW-3A, and MW-8 since 2009, and Total Sulfide has been detected within groundwater monitoring well MW-3S since 2009. The herbicide Dinoseb was detected within groundwater monitoring well MW-3S in May 2011.

No additional information regarding contaminant migration horizontally or vertically or potential or current receptors were provided within the above documents. Based upon the figures/drawings within the above documents, groundwater monitoring well MW-3S appears to be located between the review boundary and the compliance boundary as defined within 15A NCAC 2L. However, the review and compliance boundaries are not clearly designated on any of the figures/drawings.

As a result, based upon the above site specific factors, 15A NCAC 13B .0545, 15A NCAC 2L, and the unknown risk to public health and the environment, the request to return to Detection Monitoring is not approved at this time. However, the Solid Waste Section will approve an alternate frequency for Appendix II analyses within the Assessment Monitoring program for Phase 1. Therefore, the Solid Waste Section conditionally approves the following alternate frequencies for semiannual water quality monitoring:

- Please analyze for the full set of Appendix II constituents every two years (biennially) at Assessment Monitoring wells MW-3S, MW-3A, and MW-8. The next full set of Appendix II constituents should be analyzed during the Spring 2013 semiannual monitoring event. The facility's background well should also be included and analyzed for the full set of Appendix II constituents every two years; and
- During the other semiannual water quality monitoring events conducted at the Phase 1 facility, please analyze for the full set of Appendix I constituents plus any Appendix II constituent detections.

Please note that after each analyses of the full set of Appendix II constituents in which one or more new Appendix II constituents are detected, please collect four independent samples from all of the groundwater monitoring wells for Phase 1 to establish background concentrations for any of the newly detected Appendix II constituents, and please update the list of detected Appendix II constituents as needed. Please also revise the Water Quality Monitoring Plan (WQMP) for this facility regarding these changes. Within the WQMP, please include a figure designating both the review and compliance boundaries as defined within 15A NCAC 2L. Please submit the revised WQMP within 60 days of receipt of this letter.

Please also note that pursuant to 15A NCAC 13B .0545(b)(10), if constituents are consistently detected above background, 15A NCAC 02L .0202, and the approved groundwater protection standards, the owner or operator must initiate Assessment of Corrective Measures.

Finally, for future semiannual water quality monitoring report submittals, please do not include multiple water quality monitoring events within one report. This will cause the facility to be out of compliance since the water quality monitoring analytical results are due 120 days after sample collection pursuant to the rules and the facility's permit. Also, please do not include the analytical data for both Phase 1 and Phase 2 within the same Electronic Data Deliverable (EDD).

If you have any questions or concerns regarding this letter, please feel free to contact me at 919-707-8294 or by email at [jaclynne.drummond@ncdenr.gov](mailto:jaclynne.drummond@ncdenr.gov). Thank you for your continued cooperation with conducting Assessment Monitoring at this facility.

Sincerely,



Jaclynne Drummond  
Compliance Hydrogeologist  
Solid Waste Section

cc via email: Mark Poindexter, Field Operations Supervisor  
Dennis Shackelford, Eastern District Supervisor  
Ben Barnes, Environmental Senior Specialist  
Elizabeth Werner, Permitting Hydrogeologist  
Donna Wilson, Permitting Engineer  
Wayne Bell, C&D Landfill, Inc.  
David Garrett, David Garrett & Associates  
Brian Boutin, Nautilus Geologic Consulting, PLLC