

From: [Hare, Wes](#)
To: [Joan C. Snider](#)
Cc: [Shackelford, Dennis](#); [Ritter, Christine](#)
Subject: RE: Wayne County Landfill - 96-06 - methane migration monitoring exceedance
Date: Friday, March 22, 2013 10:10:27 AM

Hi Joany,

You're good for now. You'll need to do (ii), below, expeditiously. I would then contact Christine Ritter in our Permitting Branch to discuss the remediation plan, (919)707-8254.

.1626 (4) Explosive gases control. (c) If methane gas levels exceeding the limits specified in Sub-item (4)(a) of this Rule are detected, the owner or operator must:

~~DONE ✓ (i) Immediately take all necessary steps to ensure protection of human health and notify the Division, as provided in 40 CFR Part 258.23;~~

TO DO (ii) **Within seven days of detection**, place in the operating record the methane gas levels detected and a description of the steps taken to protect human health; and

TO DO (iii) **Within 60 days of detection**, implement a remediation plan for the methane gas releases, place a copy of the plan in the operating record, and notify the Division that the plan has been implemented. The plan shall describe the nature and extent of the problem and the proposed remedy.

Based on the need for an extension demonstrated by the operator, the Division may establish alternative schedules for demonstrating compliance with Sub-item (4)(c)(ii) and (iii) of this Rule.

Wes Hare

Environmental Senior Specialist

N.C. Department of Environment & Natural Resources

[Division of Waste Management / Solid Waste Section / Field Operations Branch - Compliance & Enforcement](#)

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From: Joan C. Snider [mailto:joan.snider@waynegov.com]

Sent: Friday, March 22, 2013 9:04 AM

To: Hare, Wes

Cc: 'Jonathan Pfohl'

Subject: RE: Wayne County Landfill - 96-06 - methane migration monitoring exceedance

Hi Wes,

One of our methane migration monitoring plans says, "Reports will be sent to the SWS in the event of methane exceedance." Unfortunately I did not write this plan so I do not know the intent behind this statement. Is there something you would like us to submit at this time?

Thanks for your help.

Sincerely,

Joany Snider @ Wayne Co. LF

From: Hare, Wes [<mailto:wes.hare@ncdenr.gov>]

Sent: Monday, March 18, 2013 3:57 PM

To: Joan C. Snider

Cc: Ritter, Christine; Shackelford, Dennis

Subject: RE: Wayne County Landfill - 96-06 - methane migration monitoring exceedance

As you already know, these are the requirements regarding the exceedance, specifically those highlighted:

.1626 (4) Explosive gases control.

(a) Owners or operators of all MSWLF units must ensure that:

(i) The concentration of methane gas generated by the facility does not exceed 25 percent of the lower explosive limit for methane in facility structures (excluding gas control or recovery system components); and

(ii) The concentration of methane gas does not exceed the lower explosive limit for methane at the facility property boundary.

(b) Owners or operators of all MSWLF units must implement a routine methane monitoring program to ensure that the standards of Sub-item (4)(a) of this Rule are met.

The type and frequency of monitoring must be determined based on the following factors:

(i) Soil conditions;

(ii) The hydrogeologic conditions surrounding the facility;

(iii) The hydraulic conditions surrounding the facility; and

(iv) The location of facility structures and property boundaries.

The minimum frequency of monitoring shall be quarterly.

(c) If methane gas levels exceeding the limits specified in Sub-item (4)(a) of this Rule are detected, the owner or operator must:

(i) Immediately take all necessary steps to ensure protection of human health and notify the Division, as provided in 40 CFR Part 258.23;

(ii) Within seven days of detection, place in the operating record the methane gas levels detected and a description of the steps taken to protect human health; and

(iii) Within 60 days of detection, implement a remediation plan for the methane gas releases, place a copy of the plan in the operating record, and notify the Division that the plan has been implemented. The plan shall describe the nature and extent of the problem and the proposed remedy.

Based on the need for an extension demonstrated by the operator, the Division may establish alternative schedules for demonstrating compliance with Sub-item (4)(c)(ii) and (iii) of this Rule.

(d) For purposes of this Item, "lower explosive limit" means the lowest percent by volume of a mixture of explosive gases in air that will propagate a flame at 25C and atmospheric pressure.

Please let me know if you have any questions.

Wes Hare

Environmental Senior Specialist

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From: Joan C. Snider [<mailto:joan.snider@waynegov.com>]
Sent: Monday, March 18, 2013 3:35 PM
To: Hare, Wes
Subject: RE: Wayne County Landfill - 96-06 - methane migration monitoring exceedance

Sounds good. Thanks!

From: Hare, Wes [<mailto:wes.hare@ncdenr.gov>]
Sent: Monday, March 18, 2013 3:21 PM
To: Joan C. Snider
Subject: RE: Wayne County Landfill - 96-06 - methane migration monitoring exceedance

Thanks Joany,. I'll forward it to Raleigh.

Wes Hare
Environmental Senior Specialist
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From: Joan C. Snider [<mailto:joan.snider@waynegov.com>]
Sent: Monday, March 18, 2013 3:18 PM
To: Hare, Wes
Subject: Wayne County Landfill - 96-06 - methane migration monitoring exceedance

Hi Wes,

Here's the follow-up email from our morning phone call.

Pursuant to 15A NCAC 13B .1626(4)(c)(i), Wayne County Landfill would like report a recent exceedance at one our of methane migration monitoring probes. On 3/15/2013, the methane concentration at probe MP-25 exceeded the LEL. Right now, we believe the gas is migrating along a trench that contains a gas collection system header pipe. We are working with CH4 Power, the company that installed the trench, on some ideas for correcting the issue.

Please let me know if there is any additional information you need at this time.

Sincerely,

Joany Snider
Wayne County Landfill
Dudley, NC 28580
(919) 689-2994, ex. 304