

FACTSHEET
FINAL REMEDY SELECTION

FORMER CSI LANDFILL FACILITY
1200 DRAGSTRIP ROAD
HUDSON, CALDWELL COUNTY, NORTH CAROLINA
EPA IDENTIFICATION NUMBER: NCD 086 871 282

Caldwell County submitted a Corrective Measures Study to evaluate potential remedial alternatives to treat contaminated groundwater at the site. The Corrective Measures Study discusses groundwater impacts and evaluates potential corrective actions to address groundwater contamination while ensuring continued protection of human health and the environment. The proposed remedial strategy includes monitored natural attenuation in conjunction with implementation of land use restrictions.

North Carolina has been authorized by the United States Environmental Protection Agency to administer RCRA including the Hazardous and Solid Waste Amendments (HSWA) of 1984. The North Carolina Department of Environmental Quality Hazardous Waste Section has determined that the proposed recommendations as described in the Corrective Measures Study (dated April 5, 2024) satisfy the full intent of the North Carolina Hazardous Waste Management Rules and Solid Waste Management Act as amended. When finalized, the recommended remedial strategy will constitute a final remedy under the Federal Resource Conservation and Recovery Act.

Background

The Site is located at 1200 Dragstrip Road in Hudson, Caldwell County, North Carolina. The Site is comprised of three different but contiguous tracts of land, including (1) the tract which Caldwell County leased to CSI to operate a hazardous waste management facility (~1.59 acres); (2) the County landfill property (~103 acres); and (3) the County property formerly known as the Haas property (~44 acres). The Site is bordered to the south by residential properties on Drag Strip Road and Lick Mountain Drive, and to the east, north, and west by undeveloped private property.

The hazardous waste management facility was constructed by Caldwell County, which operated it from April 1976 until January 1977. From March 1977 until 1989, Caldwell County leased the facility to CSI. During this time, the facility incinerated and/or repackaged, consolidated, blended, and liquefied waste for off-site shipment or use as fuel. The facility handled hazardous wastes from the US Navy and other industries, including torpedo fuel, solvents, waste oils, paints, tank bottoms, glues, and sludges.

Caldwell County attempted to evict CSI from the property due to the County's concern that CSI was improperly operating the incinerator. Under a court-approved settlement, CSI ceased incineration activities on May 31, 1988. After this date, CSI continued to operate as a hazardous waste storage facility, with operations including fuel blending, waste bulking, and storage of hazardous wastes.

On September 13, 1989, a fire broke out at the incinerator site. Following an investigation, the Caldwell County Health Director issued an order of abatement requiring CSI to cease all operations at the Site unless CSI could show the facility could be operated without threatening public health and welfare. CSI and Caldwell County entered into a court-approved settlement whereby CSI agreed to cease operations by December 1, 1989, and to close the facility as required by RCRA regulations.

CSI ceased operations by the required deadline and submitted a closure plan to the North Carolina Department of Natural Resources. The State regulatory agency approved the closure plan on July 13, 1990, and directed both CSI and Caldwell County to implement the closure plan.

Caldwell County entered into three separate agreements or decrees regarding environmental impacts at the Site. As part of these agreements, Caldwell County agreed to investigate and remediate groundwater impacts, while CSI and the potentially-responsible-parties that brought waste to CSI for disposal agreed to complete demolition of the facility structures and address soil impacts on the 1.59-acre parcel leased from Caldwell County.

The CSI facility demolition and impacted soil removal/capping activities were completed and summarized in the *Removal Action Summary Report* (CRA, 2001) and the *Summary of Removal Action and Corrective Measures Study* (CRA, 2005). As referenced in the latter report, a risk assessment conducted at the Site indicated no unacceptable risks to human health in relation to the former facility and site soils. No further action was recommended for site soils.

Because contaminated soils have been addressed, Caldwell County is only responsible for groundwater impacts. Caldwell County began investigating groundwater quality in October 1992. Multiple rounds of sampling over the last 30 years indicate that volatile organic compounds and per- and polyfluoroalkyl substances are the only potential constituents of concern impacting groundwater quality at the Site.

Remedy

Having completed investigation of the magnitude and extent of groundwater contamination, Caldwell County submitted a Corrective Measures Study (dated April 5, 2024) to evaluate potential remedial alternatives to treat contaminated groundwater at the site. The objective of the Corrective Measures Study is the following:

- establish remedial objectives for groundwater;
- identify appropriate remedial alternatives to address remnant groundwater contamination;
- evaluate and compare remedial alternatives in terms of effectiveness, reduction in contamination, implementability, and protection of human health and the environment; and
- recommend and justify a final remedial strategy.

Groundwater impacts at the Site can generally be described as forming a relatively large, dilute plume. Historic groundwater monitoring results indicate that contaminants have been decreasing due to natural attenuation processes. Total contaminant concentrations have decreased in most monitoring wells by greater than ninety percent from their respective maximum concentrations.

Monitored natural attenuation (MNA) in conjunction with continued land use restrictions is the recommended remedial alternative. Land use restrictions prohibiting the use of Site groundwater and zoning the property for solely for industrial use have already been implemented. These restrictions protect human health and the environment. Continued compliance is certified annually.

MNA via long-term monitoring is a remedial option in which groundwater samples are routinely collected from select monitoring wells for analysis of compounds present in Site groundwater. These data are used to evaluate compound concentrations over time and to evaluate whether natural processes such as reductive dechlorination continue to occur at the Site. Additionally, MNA data are used to understand plume migration over time to ensure that any potential receptors will not be impacted, thereby protecting human health and the environment. A natural attenuation corrective action approach is appropriate where impacted soils are not continuing to be a source of groundwater impacts, chemicals of concern are biodegrading, and potential receptors are not affected.

MNA is most effective for volatile organic compounds. It is not anticipated that MNA will fully address per- and polyfluoroalkyl substances (PFAS) in groundwater. PFAS are an emerging contaminant. It is anticipated that continued monitoring of PFAS will serve to develop a database that will be used in the future to evaluate if additional remedial action is warranted.

Public Hearing

A public hearing will be held at 12 pm on Friday, June 14, 2024, at the Caldwell County Public Library (Main) located at 120 Hospital Avenue in Lenoir, North Carolina. All attendees will have the opportunity to present

five-minute oral statements regarding the proposed final remedy and/or to submit written comments and data at the public hearing. You may also submit written comments at any time during the 45-day public comment period, which begins on May 10, 2024, and ends on June 24, 2024. Comments should be sent to the following address:

Heather Goldman, Chief
N.C. Division of Waste Management
Hazardous Waste Section
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

All data and information submitted by the parties representing the former CSI Landfill Facility are part of the administrative record and available for your review. This information can be reviewed online at: [Welcome to Laserfiche WebLink \(nc.gov\)](#). Public notices related to this decision may be found at <http://deq.nc.gov/public-notices-hearings>.

The administrative record can be viewed at any time using the above Laserfiche weblink. Electronic files can be searched using the ID Number: *086871282. Files can be filtered by selecting preferred document group and document type.