



February 16, 2012

Nathaniel D. Thornburg
Environmental Engineer
Aquifer Protection Section
Land Application Unit
N.C. Department of Environment and Natural Resources
1636 Mail Service Center
Raleigh, NC 27699-1636

RE: UNC Bingham Facility
Wastewater Surface Irrigation Project
DWQ Draft Permit WQ0023896

Dear Mr. Thornburg:

The University of North Carolina at Chapel Hill (UNC-Chapel Hill) has reviewed the referenced draft permit offers the following comments for clarification and for your consideration:

1. As of December 1, 2011, Ms. Karol Kain Gray assumed the duties of Vice Chancellor of Finance and Administration at UNC-Chapel Hill from the retiring Dr. Richard L. Mann. Her duties include the role of Responsible Official with respect to this permit.
2. Neither the draft permit nor the cover letter reference decommissioning the existing animal wastewater treatment system or the irrigation system. Decommissioning of these systems is included in the proposed modifications to the wastewater treatment system at the Bingham Facility. UNC-Chapel Hill requests additions to the cover letter and draft permit to reference these proposed activities.
3. UNC-Chapel Hill will temporarily abandon the two (2) existing monitoring wells in accordance with the permit requirements; however, since these wells will be abandoned, UNC-Chapel Hill requests that the monitoring requirement in Attachment C be limited only to the proposed new monitoring wells MW-3 and MW-4.
4. On page 2 of the cover letter, Condition I.5, MW-3 is listed twice. UNC-Chapel Hill believes that one of these references should be changed to MW-4.



5. On page 1 of the permit, UNC-Chapel Hill believes that the wording in paragraph 3 should read "continued operation and subsequent decommissioning of: approximately 320 linear feet of 8-inch gravity sewer."
6. Also on page 1 of the permit, UNC-Chapel Hill believes that the wording in paragraph 6 should read "construction of approximately 540 linear feet of 8-inch gravity sewer."
7. On page 3, section I.5., MW-3 is mentioned twice. UNC-Chapel Hill believes that one of these references should be changed to MW-4.
8. UNC-Chapel Hill did not receive a copy of Figure 1 marking the location of the new groundwater monitoring wells. Please forward a copy of Figure 1 so we can review the location of the proposed new monitoring wells on the site map.
9. On page 4 of the permit, section II.11., the requirement to secure easements from landowners who are not the permittee and who own land within the compliance boundary is stated. The delineated compliance boundary for this project, as presented in the permit application, is located entirely within the property boundary of the UNC Bingham Facility. UNC-Chapel Hill requests concurrence that this permit condition is not applicable to this project or clarification if DENR believes that the permit condition applies.
10. The sampling schedule as specified in Attachment A will require compliance sampling six (6) months of the year. In an effort to minimize potential confusion with respect to the different sampling frequencies, we suggest that quarterly sampling be utilized for all Attachment A parameters (i.e., WWTP effluent) as well as for all Attachment C parameters (i.e., Groundwater Monitoring and Limitations). UNC-Chapel Hill believes that this approach will prove to be more reliable and more easily administered than the mixed sampling frequencies contained in the draft permit.
11. UNC-Chapel Hill proposes to have our ORCs certified to conduct the weekly pH and TRC testing, please confirm this is acceptable.

Thank you for your consideration of our clarifications and requests. We also thank you for assisting UNC-Chapel Hill with the UNC Bingham Facility project.

Sincerely,

Mary Beth Koza

Director, Department of Environment, Health and Safety

CC: Charles D. Riley Jr. PE McKim & Creed