



CHAMBERS

Development of North Carolina, Inc.

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January 4, 1993

Ms. Sherri C. Hoyt, Environmental Engineer
NC Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687
Raleigh, North Carolina 27611-7687

**Re: Response to Completeness Review of Site Application
Proposed Solid Waste Management Facility - Anson County, NC
Chambers Development of North Carolina, Inc.**

Ms. Hoyt:

Chambers Development of North Carolina, Inc. (Chambers) herein addresses each of the items discussed in the completeness review letter issued by the North Carolina Department of Environment, Health, and Natural Resources (NCDEHNR) on November 30, 1992. The referenced completeness letter was issued in response to the site application prepared by Chambers for the proposed solid waste management facility in Anson County, North Carolina. The original NCDEHNR (Division of Solid Waste Management) comments are presented below in italics, with Chambers' corresponding responses immediately following.

NCDEHNR Comment No. 1

In accordance with Section .0202(a)(3) of the Solid Waste Management Rules, the plans shall bear an imprint of the registration seal of the engineer.

Five sets of the conceptual design plans are enclosed for your review. These plans have been stamped by the engineer-of-record (Mr. Hugh Gauntt) for the project. In the original site application, the hydrogeological study was stamped by a registered geologist (Mr. Maurice Ponti) in accordance with Section .0202(a)(3). However, the conceptual design plans had not been stamped because they are conceptual, and it was our intention to have the engineer-of-record stamp the construction plans.

NCDEHNR Comment No. 2

The wetlands delineation shall be certified by the U.S. Corps of Engineers.

Two copies of the wetland delineation plat are enclosed for your review. The wetlands plat has been signed and approved by the U.S. Army Corps of Engineers, Wilmington District. The Corps was actively involved with the wetland delineation process at the site from the very beginning. A copy of the Nationwide Permit No. 26 issued by the Corps of Engineers is also enclosed for your review.

NCDEHNR Comment No. 3

The letter from the local zoning authority shall address all proposed components of the facility that are located in the area that is unzoned, rather than the landfill only.

The letter issued on January 24, 1992 from the County Manager (Steve Carpenter) to the NCDEHNR stated that the area where the proposed landfill is located is not zoned. As used in the letter, the term "landfill" was meant to include the landfill disposal area and all associated facilities that comprise the entire solid waste management facility. These facilities include the yard waste composting area, the scrap tire management area, the recycling area, the maintenance facility, the leachate storage facility, the gas management area, the sediment basins, and all other associated facilities. A revised letter from the County Manager, which specifies all proposed components of the facility, is provided for your review.

NCDEHNR Comment No. 4

Potential or existing sources of ground water and surface water pollution shall be identified on the two-mile radius map as required in 15 A NCAC 13B .0504(b)(ii).

The two-mile radius map submitted with the original site application delineated the only observed significant potential source of ground water or surface water pollution near the site. Refer to Note 5 on the map for an explanation of these sources. These potential sources are gasoline stations located on U.S. Highway 74 and in the town of Polkton. A small square with the number 1 in the middle is used to delineate the sources on the map. There were no other observed potential sources within two miles of the site. However, there are other unidentifiable sources in the area, such as sewer lines, septic tanks, etc., that could be considered potential sources of pollution. The area is undeveloped for the most part, other than the town of Polkton, with limited, private residential development. Commercial development is minimal, while industrial development is practically non-existent.

NCDEHNR Comment No. 5

The service area for the facility shall be approved by the Anson County Commissioners, either by resolution or vote on a motion.

On June 4, 1991, Chambers Development of North Carolina, Inc. entered into an agreement with Anson County to site, design, construct and operate a regional solid waste management facility. This contract was publicly reviewed and approved by a majority of the Anson County Board of County Commissioners at two consecutive, regularly scheduled board meetings. Clause 16 of the contract with Anson County addresses the service area for the proposed facility. A copy of Chambers' contract with Anson County is attached for your review.

NCDEHNR Comment No. 6

The archaeological investigation shall be completed and comments from the Archaeology and Historic Preservation Section shall be forwarded to the Section.

The Phase I archaeological report prepared by Garrow & Associates for the Anson County site identified seventeen sites. Of these, twelve were recommended for additional testing to determine whether they might be eligible for listing on the National Register of Historic Places. Five of the sites were recommended as not requiring further investigation.

On June 25, 1992, the North Carolina Department of Cultural Resources (SHPO) issued a letter in response to the Phase I archaeological report at the Anson County site. SHPO concurred with the findings of the archaeology report and concluded that five of the original sites (31AN82, 124, 128, 131, 132) do not warrant further investigations. Furthermore, SHPO stated that they were unable to determine the eligibility of the remaining twelve sites (31AN60, 61, 62, 63, 64, 75, 76, 83, 125, 126, 127, 129) for the National Register until additional information was provided. A copy of the referenced letter from SHPO is enclosed for your review.

Pursuant to the SHPO findings and in consideration of our proposed development plans at the site, Chambers had Garrow conduct a Phase II archaeological investigation at five of the twelve sites. The five sites are within the areas projected for development during the NCDEHNR permit period (5 years). The remainder of the twelve sites, such as the sites in the proposed borrow area east of Boylin Road, will either never be impacted or will not be impacted for a number of years.

The Phase II testing was conducted for sites 31AN60, 31AN61, 31AN64, 31AN76, and 31AN127. The report of the Phase II testing was recently completed and forwarded to SHPO for review and comment. Garrow concluded in the Phase II report that four of the sites are not eligible for inclusion in the National Register of Historic Places. Garrow recommended that one site (31AN60) should be considered eligible for inclusion in the National Register of Historic Places. If SHPO concurs with the recommendation of Garrow concerning 31AN60, a mitigation plan will be prepared and the required Phase III testing conducted prior to any construction activities. Two copies of the Phase II archaeological report are provided for your review. The comments from SHPO concerning the Phase II archaeological report will be forwarded to the Solid Waste Section once received by Chambers.

Garrow also conducted additional Phase I archaeological testing at the site. The additional testing was conducted on property that was not included in the original investigation. This includes approximately 45 acres south of the CSX railroad and west of Boylin Road, 15 acres near the proposed facility entrance, and 30 acres north of the CSX railroad and west of Boylin Road. The report of the additional Phase I testing was recently completed and forwarded to SHPO for review and comment. The additional Phase I archaeological report identified two sites (31AN130 and 31AN133). Garrow concluded that one of the sites (31AN133) may be eligible for inclusion in the National Register of Historic Places and recommended further testing prior to any impacts. However, it is Chambers intention to avoid site 31AN133 and therefore, no further testing will be required. Garrow concluded that the other site (31AN130) does not warrant further investigation. Two copies of the additional Phase I archaeological report are provided for your review. Comments from SHPO concerning the additional Phase I archaeological report will be forwarded to the Solid Waste Section once received by Chambers.

NCDEHNR Comment No. 7

Property boundaries for the solid waste management facility shall revised to exclude the portion of the property proposed for light industrial development. This property will not be considered part of the solid waste management facility.

The proposed industrial development area included on the conceptual design plans submitted with the original site application is not to be considered for site suitability. The industrial development area boundary is not included on the revised set of conceptual design plans. Please note that the property boundary shown near U.S. Highway 74 may be subject to slight revisions due to ongoing negotiations with the property owner (NCDOT) of the triangular shaped tract that is shaded on the plans.

Chambers Development of North Carolina, Inc. is pleased to herein address each of the items listed in the completeness review letter for the proposed solid waste management facility in Anson County, North Carolina. Chambers trusts that the provided information fully addresses the concerns of the Division of Solid Waste Management of the NCDEHNR. If you have any questions or comments concerning any of the items discussed above please call me at (404) 438-7770. We look forward to working with the Division of Solid Waste Management during the remainder of the site application review and the subsequent construction plan application.

Respectfully,



John G. Buckley
Assistant Region Engineer

JB\jb

Enclosures

cc: Ellen Huntley, P.E. - Anson Co. Engineer (w/ enclosures)
Ross Povey (w/ enclosures)
Greg Cekander w/o
Jim Walker w/o
Don Beason w/o

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