



North Carolina Department of Environment and Natural Resources

Pat McCrory
Governor

John E. Skvarla, III
Secretary

December 19, 2014

Mr. Norman Divers, Environmental Manager
Charah, Inc. and Green Meadow, LLC
Post Office Box 287
Belmont, North Carolina 28012

Subject: Permit Application – Completeness Review
Brickhaven No.2 Mine Tract “A”, Structural Fill
Chatham County, DIN 22535

Dear Mr. Divers:

On November 21, 2014 the Division of Waste Management, Solid Waste Section (Section) received Charah Inc.’s Permit Application, entitled:

Permit Application, Brickhaven No.2 Mine Tract “A”, Structural Fill, Charah, Inc., Moncure, North Carolina. Prepared for Charah, Inc. Prepared by HDR Inc. November 2014. DIN 22348.

The Section has determined that additional information is needed to allow the division to make a completeness determination. Please provide the following:

Hydrogeological Review

1. Submit a site map showing the proposed base grades along with the potentiometric surface in order to determine the required 4-foot vertical separation between bottom of waste and long-term seasonal high groundwater in hard copy and electronic format (pdf).
2. Submit revised *Figure 5-Shallow and Intermediate Groundwater Potentiometric Map* to reflect the findings of the newly installed piezometers in hard copy and electric format (pdf).
3. Submit revised *Sheet 01C-05 – Site Cross Sections* to reflect the updated seasonal high groundwater surface in relation to the proposed base grades in hard copy and electronic format (pdf).
4. Submit revised *Figure 6-Water Quality Monitoring Plan* with the groundwater monitoring wells and surface water monitoring locations properly labeled in hard copy and electronic format (pdf).

Engineering Review

Facility Plan

5. 2.4.1 -The method of leachate storage is not chosen. Please submit the method chosen for permit review.

6. Drawing 01-G2 states that a portion of the property is in the floodplain, while the survey, (Figure 2) certifies that the property is NOT in the floodplain. Please verify and correct as needed.
7. Financial assurance- Appendix G- Financial assurance numbers could be subject to change depending on the final design plans. General Statute 130A-309.217 specifies that coverage be posted to cover any sudden and nonsudden accidental occurrences. Please submit information to document coverage for sudden and nonsudden accidental occurrences. This coverage is for the corporation's operation in North Carolina rather than specific to an individual facility.
8. 4.4.5 CQA Plan- Refers to backfilling of the anchor trench. The plan must address the handling and protection of the runout of the liner, construction and filling of the anchor trench as well as welding/joining to the next cell for continued construction. Items such as welding a cap strip over the joining seam, verifying integrity of GCL, joining of the low permeability soil component and the like must be addressed.

Technical Specs

9. Specifications and engineering designs for leachate storage tanks and secondary containment, or leachate lagoons must be provided for the permitting of the leachate handling infrastructure.

Drawings

10. 01-07 the plan must address protection of liner runout and liner tie in and joining of subcells etc.

The following items are provided for information and planning purposes.

General

Transfer/offloading sites that will feed coal ash to this site must have environmental controls and operation plans in place that are protective of public health and the environment. Please describe those plans.

Prior to Construction – the following must be provided to the Section prior to commencement of construction:

Install new piezometers in Cell 3 and Cell 5 in order to get a better understanding of groundwater depth and flow.

Submit well abandonment records (Form GW-30) for each abandoned piezometer as needed during the progression of construction of each Subcell in electronic format (pdf).

Provide the approved Erosion and Sedimentation Control permit from the Division of Energy, Mining and Land Resources, in electronic format (pdf), for the Section's database record.

In areas with streams and/or wetlands, provide the approved 404/401 from U.S. Army Corps of Engineers and/or the N.C. Division of Water Resources, in electronic format (pdf), for the Section's database record.

Prior to Initial Operation – the following must be provided to the Section prior to commencement of operations:

Submit a monitoring report of the four (4) independent background monitoring events for the eight (8) compliance groundwater monitoring wells and one (1) background monitoring event for the two (2) surface water monitoring locations in electronic format (pdf).

A leachate disposal permit must be provided, in electronic format (pdf), for the Section's database record.

The CCP generator location forms must be provided for each generator site, in electronic format (pdf), for the Section's database record.

Submit TCLP analysis reports for each new CCP generator site identified, in electronic format (pdf), for the Section's database record.

An approved Financial Assurance mechanism must be established.

Additional technical information to supplement the permit application will be requested upon further permit review.

Please address the above issues from the original application and combine any addendums provided to the Section in an amended permit application. Two (2) hard copies and an electronic (pdf) copy of the amended application must be provided to the Section. Should you have any questions, contact Mr. Larry Frost at (828) 296-4704 larry.frost@ncdenr.gov or Mrs. Elizabeth Werner (919) 707-8253 elizabeth.werner@ncdenr.gov.

Sincerely,

Edward F. Mussler, III, P.E., Supervisor
Permitting Branch, Solid Waste Section
Division of Waste Management, NCDENR

Cc:	Joe Readling	HDR Engineering
	Larry Frost	DWM
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