



North Carolina Department of Environment and Natural Resources

Pat McCrory
Governor

Donald R. van der Vaart
Secretary

March 12, 2015

Sent Via Email - BWaldrop@fcsi.biz

Mr. Robert Waldrop
Full Circle Solutions Inc.
President and CEO
665 Molly Lane, Suite 100
Woodstock, Georgia 30189

Sent Via Email - dave.franchina@klgates.com

Mr. David Franchina *on behalf of ReUse Technology Inc.*
K&L Gates
Hearst Tower
214 North Tryon Street
47th Floor
Charlotte, NC 28202

Re: *Groundwater Corrective Action Plan*
Swift Creek CCB Structural Fill
Battleboro, Nash County
CCB0057
DIN 23961

Dear Mr. Waldrop and Mr. Franchina,

The Solid Waste Section has completed a review of the *Corrective Action Plan* dated February 2015 (DIN 23902) and received via email on February 27, 2015 for the Swift Creek Coal Combustion By Product (CCB) Structural Fill, CCB0057. The *Corrective Action Plan* was submitted in response to the consistent groundwater exceedances at the facility.

A remedy was selected and the Solid Waste Section approved the remedy on December 1, 2014 (DINs 22154 and 22410). The remedy includes the following: (1) source area contaminant control via removal of CCB materials, raising the floor foundation above seasonal high groundwater table, and the installation of a Linear Low Density Polyethylene synthetic liner over the limits of beneficially filled CCBs, (2) the reduction of the footprint of beneficially filled CCBs, and (3) drainage improvements to minimize rainfall infiltration and discharge of constituents to groundwater to allow intrinsic remediation of the existing affected groundwater. Construction activities are scheduled to begin mid 2015 or sooner. Upon completion of the construction, quarterly landfill cap inspections will be conducted and will continue for five years. In addition, semiannual water quality monitoring will also continue to determine the effectiveness of the selected remedy.

As a result, the *Corrective Action Plan* is approved as described for immediate implementation. If you have any questions or concerns regarding this letter, please feel free to contact me at 828.296.4706 or by email at jaclynne.drummond@ncdenr.gov. Thank you again for your continued cooperation with this matter.

Sincerely,



Jaclynne Drummond
Compliance Hydrogeologist
Solid Waste Section, Division of Waste Management
NCDENR

cc sent via email: Michael Scott, Division of Waste Management Deputy Director
Ellen Lorscheider, Solid Waste Section Chief
Jason Watkins, Field Operations Branch Head
Dennis Shackelford, Eastern District Supervisor
Shawn McKee, Environmental Senior Specialist
Ben Barnes, Environmental Senior Specialist
Dave Wasiela, ERM NC, Inc.
Wendi Johnson, NCDOT Division 4 Construction Engineer
Gary Lovering, NCDOT Roadway Design Engineer