



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

November 30, 2007

Dr. G. Van Ness Burbach, Ph.D., P.G.
Joyce Engineering, Inc.
2211 West Meadowview Road, Suite 101
Greensboro, NC 27407

RE: Volume II, – Permit To Construct &
Appendix 3 – Phase 3 Design Hydrogeologic Report for Coble's Sandrock, Inc.,
Construction and Debris Landfill – Phase 3A (6.3 acres), 3B (5.8 acres)
Alamance County
Additional information request
Permit No. 01-05

Dear Dr. Burbach:

The above referenced Permit to Construct (Volume II) and Design Hydrogeologic Report (Appendix 3 of Volume II) for the proposed phases 3A, 3B, Construction and Debris Landfill, submitted by Joyce Engineering, Inc., on behalf of Coble's Sandrock, Inc. is being reviewed by the Solid Waste Section (SWS). There are several items in Volume II, including the Hydrogeologic Report that requires clarification and/or revision before the hydrogeologic review can be completed. Please respond to the following questions and comments:

*Volume II – Application for Permit to Construct
Appendix 3 – Design Hydrogeologic Report
Section 2.A.07.02 – Long-Term Seasonal High Water Table
Drawing No. H-7 – Long-Term Seasonal High Water Table With Proposed Base Grades*

Page 11 of Section 2.A.07.02 states in-part: *“Drawing H-7 depicts long-term seasonal high groundwater level contours based on the data in Table 6”*.

Drawing H-7 depicts the correct title, *“Long-Term Season High Water Table Contour...”*; however, the legend on the drawing states *“Seasonal High Ground-Water Contours”*. Please modify the legend for Drawing No. H-7 to read: *“Long-Term Seasonal High Ground-Water Contours”*.

Volume II Permit to Construct Phase 3

Drawings

Drawing No. EP-10

Drawing No. EP-02

Appendix 3 – Design Hydrogeologic Report

Section 2.E.03 – Vertical Separation From Seasonal High Water Table

Drawing No's. H-4A, H-4B, H-4C, H-6, H-7

Page 24 of Section 2.E.03 states: “NCSWMR § .0540.2.ba requires that the C&D landfill units be constructed so that the post-settlement bottom of waste is a minimum of 4 feet above the seasonal high water table. The proposed Phase 3A and Phase 3B base grades are shown relative to the long-term season high water table on Drawing H-7 and in cross sections in Drawings H-4a,b, and c. The proposed base grades are designed to be a minimum of 4 feet above the long-term seasonal high water table, which is more protective than NCSWMR § 0.0540 requires.”

Drawing No's. H-4A, H-4B, H-4C, and H-7 in the Design Hydrogeologic Report depict in the legend “seasonal high water level”. It is presumed this is actually the long-term seasonal water table instead, as mentioned in the narrative statement above? Please modify the legend of these drawings to read “long term seasonal high water table”.

In addition, modify Drawing No's, H-4A, H-4B, and H-4C (Cross sections) by showing direction of horizontal and vertical flow of ground-water, via arrows and/or equipotential lines [**Reference: Rules .0538(b)(2)(G-H)**].

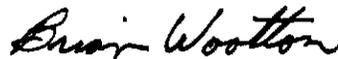
Drawing EP-02 included in the Drawing portion of Volume II depicts “estimated seasonal high groundwater contours”. Is this the actual seasonal high ground-water elevation or is it the long-term seasonal high elevation? Please clarify.

Drawing EP-10 included in the Drawing portion of Volume II lists the Seasonal High GW Elevation in the legend. Is this the actual seasonal high ground-water elevation or is it the long-term seasonal high elevation? NC Solid Waste Section Rules require that both the seasonal high and long-term seasonal high water table elevations be depicted on Engineering Drawing Cross-sections (i.e. Drawing No. EP-10) [**Rule .0539(e)(6)(A)**]. Please modify Drawing EP-10 accordingly.

Dr. G. Van Ness Burbach, P.G.
Coble's Sandrock C&D landfill expansion, Permit to Construct, Hydro Report
Additional Information Request - 1
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Please note the comments and questions stated above and provide additional information and revisions as needed. If you and your staff have any questions, or wish to schedule a meeting to discuss the items referenced in this letter, please call me at 919-508-8524.

Sincerely,



Brian Wootton
Hydrogeologist
Solid Waste Section

cc: Evan Andrews, P.E.
Ed Mussler
Geof Little
Central File

Joyce Engineering, Inc.
Solid Waste Section
Solid Waste Section