December 12, 2007

MEMORANDUM

To: Geof Little

From: Brian Wootton

Subject: Application for Permit to Construct,
Coble's Sandrock, Inc. Alamance County – C&D Landfill
Proposed Phase 3A (6.3 acres), 3B (5.8 acres)
Design Hydrogeologic Study - Final Comments
Permit No. 01-05
RCO#3535

I have reviewed the Permit to Construct Application [proposed addition of Phase 3A (6.3 acres) and Phase 3B (5.8 acres)] pertaining mostly to hydrogeologic concerns. The application was received by the SWS on November 9, 2007 and additional documentation received on December 10, 2007.

The Application and supporting information meets the criteria required in the Rules [(i.e. 15A NCAC 13B .0538(b), 15A NCAC 13B .0539(e)(6), 15A NCAC 13B .0540(1-2), 15A NCAC 13B .0544, and Solid Waste Section policy]; therefore, I have no objection to issuance of this portion to Permit to Construct based on these rules.

Prior to construction activities commencing, the Solid Waste Section requests the following information is addressed from the permittee.

Prior to construction of cell(s), all piezometers, ground-water monitoring wells, and borings, located in the proposed cell, shall be properly abandoned by overdrilling first (exception of non-cased borings) and sealed with grout in accordance with 15A NCAC 2C.0113(b)(1), titled "Abandonment of Wells".

a. In areas where soil is to be undercut, wells should not be grouted to pre-grade land surface, but to the proposed base grade surface to prevent having to cut excess grout and possibly damaging the wells.

b. Well abandonment records for each piezometer, ground-water monitoring well and boring shall be certified by the permit holder's geologist and submitted to the Solid Waste Section in accordance with 15A NCAC 02C.0114(b).

Construction Conditions: (Include these conditions in the Permit to Construct)

The owner's geologist shall examine the cell excavation and note any pertinent geologic features exposed during the construction process and shall notify the Solid Waste Section Hydrogeologist of these findings prior to placement of any liner materials.

The owner's geologist shall be in the field to supervise all ground-water monitoring well installations. Any modifications to the approved water quality monitoring plan require approval by the Section Hydrogeologist. Documentation of all changes to the approved plan shall be submitted with the well construction records.

For each well constructed, a well construction record, well schematic, boring log, and a description of well development activities shall be submitted to the Section within 30 days of well completion.

After well completion, provide a scaled map depicting the location of the new ground-water monitoring wells; existing ground-water monitoring wells, and abandoned ground-water monitoring wells.

Pre-Operational Condition: (Include this condition in the Permit to Construct)

Ground water monitoring wells and surface water sampling locations associated with Phase 3A and 3B shall be sampled for the Appendix 1 constituent list plus additional parameters mentioned in the Water Quality Monitoring Plan and according to Rule .0544, prior to issuing the Permit to Operate.

Please contact me with any questions or comments. I can be reached at (919) 508-8524 or by e-mail.

Sincerely,

Brian Wootton

Brian Wootton

cc: Ed Mussler Solid Waste Section
Central File