



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

April 11, 2005

Mr. Timothy Grant, L.G.
Camp Dresser & McKee
5400 Glenwood Ave., Suite 300
Raleigh, N.C. 27612

RE: Black Bear Disposal, LLC,
a subsidiary of Waste Industries, USA, Inc.
Site Study Revisions of March 31, 2005
Camden County, North Carolina

Dear Mr. Grant,

The March 31, 2005, revisions to the above referenced Revised Site Study Report of February 2005 have been reviewed for hydrogeologic concerns by the Solid Waste Section. There are still some items in the Report that require clarification, revision, or additional information. Please respond to the following questions and comments:

Section 8 - Preliminary Geotechnical Evaluation:

The text of Section 8 has been revised to include many references to a "bioreactor landfill". It is not clear why it was necessary to make these changes... Does a "bioreactor landfill" require different geotechnical considerations from a regular MSW Landfill?

- 8.1 It is stated that the MSW bioreactor landfill will be "approximately 490 acres" in size. On the following page, in section 8.3, it is stated to be "approximately 475 acres". All references in the Reports need to be consistent in the size of the proposed landfill footprint referenced.
- 8.1 The amount of waste expected to be disposed at the landfill facility has been significantly changed from the previous document. Is this current number believed to be more accurate? Why was the number revised? It appears that an extraneous "d" has been added to the "(cyd)" abbreviation for cubic yards.

8.3 It appears that the reference to the location of the reclaimed farmland has been incorrectly changed from "north and west" to "north and south". In the second paragraph, there are two references that ditches run along the landfill "footprint". These should reference the landfill facility boundary, rather than the landfill footprint.

- There continue to be problems with the pagination. The text goes from page 8-4 (to Table 8-1) to page 8-7 to page 8-9. There do not appear to be any pages 8-6 or 8-8.

Table 8-1 Note 2 on this table still appears to reference the wrong year in the date.

Table 8-3 For Test Boring Number B-7, Sample No. S-9A, the Grain Size Analysis for % Sand is incorrect.

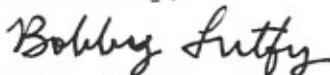
8.6.3 The numbers in the second paragraph on page 8-14 do not match the numbers in Table 8-5. In the fourth paragraph on page 8-14, should the table referenced be Table 8-5, rather than 8-4?

page 8-20 Was the section on "Liquefaction Potential Evaluation" that was in the previous document left out of the revised text on purpose?

Sheet 8-1 For the borings for which there is documentation in Appendix A, borings B-1 through B-29, all of the TOC elevations on the drawing are inconsistent with those on the Boring Logs. (The Boring Logs for B-20, B-21, and B-22 do not have the TOC elevations.) I have not checked the elevations for the other borings. However, I did notice that the Ground Elevation (GE) for boring GP-33 is incorrect.

Please respond to these questions and comments, and provide revisions as necessary. If you have any questions regarding items in this letter, please contact me at (919) 508-8507.

Sincerely,



Bobby Lutfy, Hydrogeologist
Solid Waste Section

cc: Jim Barber, Ed Mussler, John Crowder, Chuck Boyette - SWS
Jerry Johnson - Waste Industries