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October 15, 2007



Mr. Geoffrey H. Little
Environmental Engineer
North Carolina Department of Environment and Natural Resources
Division of Waste Management
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

**RE: TECHNICAL REVIEW OF EVIDENTIARY SUBMITTALS
WCA OF HIGH POINT, LLC
PERMIT NO. 41-16 DOC ID NO. RCO3196**

Dear Mr. Little:

This responds to your letter of October 11, 2007 regarding issues that need to be addressed in order to complete the Division of Waste Management's review for the above referenced permit. A copy of your letter is enclosed.

Per your request, a signed certification for the construction application is enclosed. The signed certification restates and underlines the proper name of the facility. Please also see the footnote that was added to the signed certification.

Regarding the acreage of the facility, the information provided in the February 2005 submittal of 153.79 acres does not include the two areas to be dedicated for right-of-ways. These two areas are clearly shown on the map provided with Exhibit 8 of the December 18, 2006 submittal. The map shows that 3.71 acres and 0.26 acres are to be dedicated for right-of-ways, and shows the acreage of the site, less the right-of-ways, as 149.83 acres.

The three parcels numbered Tracts 1, 2, and 3 mentioned in your letter were conveyed by MRR High Point Real Estate, LLC to D. H. Griffin, Sr. in 2005 by Special Warranty Deed. A copy of that deed is enclosed. These tracts are residential and not part of the subject facility.

Mr. Geoffrey H. Little
October 15, 2007
Page 2

Please confirm that the above information has satisfied the concerns stated in your October 11, 2007 letter, and that upon payment of the permit fees, the Division will proceed with issuance of the permit for this facility.

Sincerely,


Vernon Smith

Enclosures

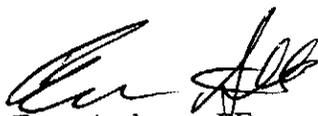
cc: Stephen R. Berlin
Ed Menger

STATEMENT OF COMPLIANCE WITH CONSTRUCTION PLAN APPLICATION REQUIREMENTS

It is our opinion that the information and design presented in this Construction Plan Application for the proposed WCA of High Point, LLC, Construction and Demolition Debris Landfill meet the requirements of Rule .504 of the North Carolina Solid Waste Management Rules, 15A NCAC 13B.

Please Note: This document was revised in February 2005, to reflect new facility ownership by WCA of North Carolina, L.P., and a new franchise agreement with the City of High Point. The latter contains no significant changes other than to reflect/acknowledge the new facility owner and new facility name of WCA of High Point, LLC.¹ All original permit applications and applicable drawings for the facility were signed, dated and sealed by a North Carolina registered professional engineer.

Respectfully Submitted
JOYCE ENGINEERING, INC.



Evan Andrews, PE
Technical Consultant

¹ When the February 21, 2005 franchise was initially approved by the City of High Point, several clerical and/or ministerial errors caused the name of the franchise to be stated as "WCA (*Waste Corporation of America*)" instead of the correct name, WCA of North Carolina, L.P. At the time of the initial approval, WCA of North Carolina L.P. had a "current-active" corporate status in North Carolina and maintained that status until December 27, 2005. A change in corporate structure resulted in the substitution of WCA of High Point, LLC for the subsequently canceled WCA of North Carolina, L.P. A correction of the February 21, 2005 franchise was obtained from the City of High Point on November 20, 2006, and the name that now appears on the franchise is WCA of High Point, LLC.



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

October 11, 2007

Vernon Smith, General Manager
WCA Waste Corporation
40 Estes Plant Road
Piedmont, SC 29673

Re: Technical Review of Evidentiary Submittals
WCA of High Point LLC
Permit No. 41-16 Doc ID No. RCO3196

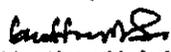
Dear Mr. Smith:

Following review of submittals sent to us on November 16, 2006, and December 18, 2006, and by email from Attorney Steve Berlin on September 24, 2007, the issues listed below need to be addressed in order to complete our review.

- The construction application certifying the project dated June 2002 and revised January 2003 and February 2005 was not signed by the project professional engineer Mickle Elliot. Please submit a new certification stating the proper name of the facility. By so stating the name in the certification, we will choose to not require the remaining pages of the document to be amended for the proper facility name.
- The submittals referenced above contain a discrepancy in the acreage. Section 1.0 General and the composite map in Appendix 1 of the February 2005 submittal show the property as 153.79 acres. Exhibit 8 of the December 18, 2006, submittal shows the property to be 149.83 acres. Please clarify and provide a corrected page 1, Section 1.0 General in the February 2005 submittal if needed.
- Exhibit 8 of the December 18, 2006, submittal indicates MRR High Point Real Estate, LLC, as owner of three parcels numbered Tracts 1, 2, and 3. Please clarify the relationship of the parcels to the facility. The function or relationship of the parcels to the disposal facility may require additional action.

The consideration of financial issues with the addition of WCA Waste Systems, Inc., to the permit satisfies requirements for proceeding with the permit. With satisfaction of the above concerns and payment of permit fees, we will proceed with the issuance of this permit. Thank you for your patience in this matter. Please contact me at 919.508.8498 with any questions regarding this letter or to discuss the matter further.

Sincerely,


Geoffrey H. Little
Environmental Engineer

Geoffrey H. Little
Solid Waste Section
NCDENR
2007.10.11 09:48:08 -04'00'

c: Steve Berlin, Kilpatrick Stockton
Dexter Matthews, DWM
Paul Crissman, DWM

STATEMENT OF COMPLIANCE WITH CONSTRUCTION PLAN APPLICATION REQUIREMENTS

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Please Note: This document was revised in February 2005, to reflect new facility ownership by WCA of North Carolina, L.P., and a new franchise agreement with the City of High Point. The latter contains no significant changes other than to reflect/acknowledge the new facility owner and new facility name of WCA of High Point, LLC.¹ All original permit applications and applicable drawings for the facility were signed, dated and sealed by a North Carolina registered professional engineer.

Respectfully Submitted
JOYCE ENGINEERING, INC.

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0589

RECORDED - 958403
JEFF L. THIGPEN
REGISTER OF DEEDS
GUILFORD COUNTY, NC
BOOK: 6306
PAGE(S) 0589 TO 0594
05/04/2005 12:40:16

05/04/2005 GUILFORD CO. NC
1 DEEDS 958403 \$12.00
4 DEEDS ADM PGS \$12.00
1 PROBATE FEE \$2.00

GUILFORD COUNTY 5/ 4/2005
NC REAL ESTATE EXT \$550.00

Prepared by: L. James Blackwood, II
Return to: L. James Blackwood, II *PL*
Excise Tax \$550.00

15/8

STATE OF NORTH CAROLINA SPECIAL WARRANTY DEED
COUNTY OF GUILFORD

THIS SPECIAL WARRANTY DEED (this "Deed"), made and entered into this 2¹st day of April, 2005, by and between MRR HIGH POINT REAL ESTATE, LLC, a North Carolina limited liability company (hereinafter called "Grantor"), and D. H. GRIFFIN, SR., of Jamestown, Guilford County, North Carolina (hereinafter called "Grantee"), whose mailing address is: 2022 Shiner Drive, Jamestown, North Carolina 27282. The designation Grantor and Grantee as used herein shall include said parties, their heirs, successors, and assigns, and shall include singular, plural, masculine, feminine or neuter as required by context.

WITNESSETH, that the Grantor, for a valuable consideration paid by the Grantee, the receipt of which is hereby acknowledged, has and by these presents does grant, bargain, sell and convey unto the Grantee in fee simple, that certain lot or parcel of land situated in Jamestown Township, Guilford County, North Carolina and more particularly described as follows:

See Exhibit "A" attached hereto and incorporated herein by reference.

TO HAVE AND TO HOLD the aforesaid lot or parcel of land and all privileges and appurtenances thereto belonging to the Grantee in fee simple.

And the Grantor covenants with the Grantee, that Grantor has done nothing to impair such title as Grantor received, and Grantor will warrant and defend the title against the lawful claims of all persons claiming by, under or through Grantor, other than the following exceptions:

Ad valorem taxes for the year 2005, which are to be prorated through the date of closing; easements, restrictions and reservations of record, including specifically but not limited to those Restrictive Covenants set forth in Exhibit B to that Deed recorded in Book 6285, Page 635, Guilford County Public Registry, the terms of which are hereby incorporated by reference; the lien of that certain Deed of Trust from Grantor

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to L. James Blackwood II, Trustee, in favor of Cora A. Robbins, recorded in Book 5286 at Page 1615 of the Guilford County Register of Deeds, dated August 6 2001 securing a note in the original principal amount of \$75,000 and encumbering a portion of the property described thereon, which Grantee assumes by its acceptance of this Deed; and that certain Lease between Grantor and Cora A. Robbins, dated the 7th day of August, 2001 relative to a portion of the property conveyed herewith which Grantee assumes and accepts by its acceptance of this Deed.

IN WITNESS WHEREOF, the Grantor has duly executed the foregoing instrument as of the day and year first above written.

MRR HIGH POINT REAL ESTATE, LLC, a North Carolina limited liability company by MRR Southern, LLC, Member-Manager

By: [Signature]
Title: Manager

STATE OF NORTH CAROLINA - COUNTY OF Guilford

I, the undersigned, a Notary Public of the County and state aforesaid, certify that F. NORBERT HECTOR, JR., Manager of MRR Southern, LLC, the sole Member Manager of MRR High Point Real Estate, LLC personally appeared before me this day and acknowledged the execution of the foregoing instrument for and on behalf of said Company. Witness my hand and official stamp or seal, this 22nd day of May, April, 2005.

PATRICIA F. MURRAY
NOTARY PUBLIC
GUILFORD COUNTY, NC

[Signature]
Notary Public

My Commission expires: 2-22-2007

EXHIBIT A**DESCRIPTION OF PROPERTY CONVEYED****TRACT 1:**

ALL of that property generally known as Guilford County Tax Map #: ACL 94-7043; 941;23 and a portion of ACL 94-7041; 940; 16, more particularly described as follows:

BEGINNING at a new iron pin at the intersection of the southwestern right-of-way line of Kivett Drive and the western right-of-way line of Riverdale Road, said beginning point being South 56° 23' 30" West 34.18 feet from a mag nail at the intersection of the centerline of rights-of-way of Riverdale Road and Kivett Drive; thence from said beginning point along the western right-of-way line of Riverdale Road South 6° 19' 27" East 549.76 feet to an existing iron pin, at the northeastern corner of that property now or formerly owned by Michael Carroll Auman as described in Deed recorded in Deed Book 3504, Page 134, Guilford County Public Registry; thence leaving the western right-of-way line of Riverdale Road and along the northern boundary line of the property now or formerly owned by Auman as described in the aforesaid Deed North 81° 30' 52" West 249.84 feet to an existing iron pin; thence South 6° 4' 40" East 91.54 feet to an existing iron pin, the southwestern corner of the aforesaid property now or formerly owned by Auman and further being on the northern boundary of that property now or formerly owned by Roger Dale Queen and wife as described in Deed recorded in Deed Book 4576, Page 354, Guilford County Public Registry; thence running along the northern boundary of the property now or formerly owned by Queen as described in the aforesaid Deed North 79° 12' 16" West 564.06 feet to an existing iron pin; thence along the eastern boundary of the property now or formerly owned by Ina H. Kersey and W. C. Kersey as described in Deed recorded in Deed Book 3014, Page 653, Guilford County Public Registry, North 53° 49' 0" East 521.81 to an existing iron pin; thence North 59° 43' 53" West 234.00 feet to an existing iron pin; thence North 43° 45' 39" East 324.95 feet to a new iron pin in the southwestern right-of-way line of Kivett Drive; thence with the southwestern right-of-way line of Kivett Drive, South 62° 14' 13" East 375.61 feet to the point and place of beginning, containing approximately 8.27 acres more or less and being in accordance with survey prepared by Mark Terry & Assoc., Inc., P.C., dated July 17, 2001.

The above described Tract 1 is further all that property heretofore conveyed to Grantor by Deed recorded in Book 5286, Page 1612, Guilford County Public Registry and Grantor by this Deed intends to convey all of Grantor's interest in the property described in the aforesaid Deed.

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TRACT 2:

ALL that property generally known as 5854 Riverdale Drive, Jamestown, North Carolina, Guilford County Tax Map No. 94-7043;941; 7, lying and being in Jamestown Township Guilford County, North Carolina more particularly described as follows:

BEGINNING at an existing iron pin; said existing iron pin being located in the southern right-of-way margin of Riverdale Drive and also being the northwestern most corner of that property owned (now or formerly) by Richard Odell Hutchins (See Deed recorded in Book 3125, Page 163, Guilford County Registry); running thence from said Beginning Point and along the western boundary line of that property owned by Hutchins South 09° 56' 49" West 165.19 feet to an existing iron pin; running thence from said existing iron pin and along the northern boundary of Hutchins property North 79° 55' 02" West 100.12 feet to an existing iron pin; running thence from said existing iron pin North 09° 58' 20" East 234.52 feet to an existing iron pin in the southern margin of the right-of-way of Riverdale Drive; running thence from said existing iron pin and along the southern margin of the right-of-way of Riverdale Drive South 45° 13' 44" East 121.84 feet to the Point and Place of Beginning, according to a map entitled "Survey for Gregory A. Steele and wife, Lisa Steele" dated July 17, 1996 as drawn by Morgan Surveying & Design.

The above described Tract 2 is further all that property heretofore conveyed to Grantor by Deed recorded in Book 5758, Page 1843, Guilford County Public Registry and Grantor by this Deed intends to convey all of Grantor's interest in the property described in the aforesaid Deed.

TRACT 3:

ALL that property generally known as 4016 Kivett Drive (also known as 6306 through 6322 Dan Lee Road), Jamestown, North Carolina, Guilford County Tax Map No. 94-70411 940; 8, lying and being in Jamestown Township Guilford County, North Carolina more particularly described as follows:

BEGINNING at a point, said point being the common intersecting point of the southern right-of-way line of Kivett Drive and the eastern right-of-way line of Danlee Street, said point also being Walter B. Robbins' northwest property corner; thence with Robbins' western line along the western right-of-way line of Danlee Street South 35° 58' 32" West 330.24 feet to a point, Robbins corner; thence leaving Danlee Street, following a line with Robbins, South 67° 31' 00" East 234.00 feet to a point, said point being a corner with Robbins; thence following a line with Robbins' property line South 46° 01' 03" West 521.84 feet to a point in

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the line of Billy S. Ingram; thence following the northern line of Ingram North $87^{\circ} 11' 57''$ West 474.46 feet to a point, said point being Ingram's northwest corner and the northeast corner of H.P. Mortgage & Investment Company, said point also being the southeast corner of another tract with Billy S. Ingram; thence following Ingram's eastern line, North $02^{\circ} 55' 56''$ East 30.00 feet to a new corner, said point being the southwest corner of Lot A, Daniel L. Kersey Plat as duly recorded in the Guilford County Register of Deeds, Book 59, Page 141; thence following the south line of Lot A of aforesaid subdivision, South $87^{\circ} 04' 04''$ East 14.99 to a point, another corner of said Lot A; thence following the east line of said Lot A, North $36^{\circ} 00' 04''$ East 808.52 feet to a point; thence North $20^{\circ} 36' 14''$ East 120.88 feet to a point, said point being the southern right-of-way line of Kivett Drive; thence following the southern right-of-way line of Kivett Drive, South $72^{\circ} 55' 56''$ East 50.00 feet to a point; thence continuing along the southern right-of-way line of Kivett Drive South $71^{\circ} 37' 41''$ East 100.00 feet to a point; thence South $70^{\circ} 07' 10''$ East 6.81 feet to a point, said point being the northwest property corner of Joseph M. Kersey; thence along the western line of Joseph M. Kersey South $40^{\circ} 41' 34''$ West 164.54 feet to a point, the southwestern corner of the Joseph M. Kersey Property; thence along the southern line of Joseph M. Kersey South $54^{\circ} 19' 40''$ East 125.94 feet to a point on the western right-of-way line of Danlee Street; thence following Joseph M. Kersey's eastern line along the western right-of-way line of Danlee Street North $35^{\circ} 58' 32''$ East 195.76 feet to a point in the southern right-of-way line of Kivett Drive; thence following the southern right-of-way line of Kivett Drive, South $70^{\circ} 07' 10''$ East 35.89 feet to the point and place of BEGINNING.

The above described Tract 3 is further all that property heretofore conveyed to Grantor by Deed recorded in Book 5758, Page 1847, Guilford County Public Registry and Grantor by this Deed intends to convey all of Grantor's interest in the property described in the aforesaid Deed.

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**JEFF L. THIGPEN, REGISTER OF DEEDS
GUILFORD COUNTY
201 SOUTH EUGENE STREET
GREENSBORO, NC 27402**

.....
State of North Carolina, County of Guilford

The foregoing certificate of Patricia J Murray

.....
A Notary (Notaries) Public is/are certified to be correct. This instrument and this certificate are duly registered at the date and time shown herein.

JEFF L. THIGPEN, REGISTER OF DEEDS

By: Jane Schultz
Deputy - Assistant Register of Deeds

.....
**This certification sheet is a vital part of your recorded document.
Please retain with original document and submit when re-recording.**