



November 12, 2010

Ms. Donna Wilson
Environmental Engineer
North Carolina Dept. of Environment and Natural Resources
Division of Waste Management - Solid Waste Section
401 Oberlin Road, Suite 150
Raleigh, NC 27605

Re: Capitol C&D Waste Transfer Facility
(Solid Waste Permit No. 92-37T)
Raleigh, North Carolina

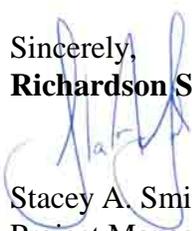
Dear Ms. Wilson:

On behalf of Capitol Waste Transfer, LLC (CWT) and David W. King, Jr., Richardson Smith Gardner & Associates, Inc. (RSG) has prepared this notice of change in corporate structure for the above reference site. As you are aware, the Solid Waste Management Act of 2007 requires notice by the permittee “*within 30 days of any significant change in the identity or business structure of either the owner or the operator*”.

Mr. King intends to restructure three (3) of the subsidiary companies (Capital Waste Transfer, LLC, Capital Waste Systems, LLC, and Allied Installation, LLC) as shown in **Attachment A** to be under the direct ownership of Mr. King as shown in **Attachment B**. This revision only affects the above referenced facility. Therefore, we request a modification of the permit to remove Shotwell Transfer Station, Inc. as a permit holder. It is our understanding the Section does not require any other updates for financial assurance, applicant certifications, etc. as these documents have not changed.

Should you have any questions or require clarification, please contact us at (919) 828-0577 or by email.

Sincerely,
Richardson Smith Gardner & Associates, Inc.


Stacey A. Smith, P.E.
Project Manager, Ext. 127
stacey@rsgengineers.com

Att.

Cc: Mr. David W. King, Jr.
Mr. John Brown, Capital Waste Transfer, LLC
Mr. David Liggett, Ragsdale Liggett
Mr. Donald Herndon, NCDENR
Mr. Jason Watkins, NCDENR
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ATTACHMENT A

DAVID W KING, JR.

Shotwell Landfill, Inc.

Shotwell Trucking, LLC

Shotwell Transfer Station, Inc.

Shotwell Transfer Station II, Inc.

Debris Removal Partners, LLC

Dynasty Holdings, LLC

Capitol Waste Transfer, LLC

Capitol Waste Systems, LLC

Allied Installation, LLC

EXHIBIT A

ORGANIZATIONAL EXPLANATION

The attached organizational chart shows the ownership structure and names of the various entities controlled by David W. King, Jr. Mr. King owns 100% of the common stock of Shotwell Landfill, Inc., Shotwell Transfer Station, Inc., Shotwell Transfer Station II, Inc. and 100% of the membership interests of Shotwell Trucking, LLC, Debris Removal Partners, LLC and Dynasty Holdings, LLC. All of these companies are run through Mr. King's office located at 3209 Gresham Lake Road, Suite 114-115, Raleigh. Although the companies are all owned by Mr. King, they are not related to each other beyond ownership; in other words, none of the companies are subsidiary companies of another.

Shotwell Landfill, Inc. owns and operates the landfill located at 4724 Smithfield Road, Wendell, North Carolina 27591.

Shotwell Transfer Station operates a construction debris transfer facility located at 5505 Thornton Road, Raleigh, North Carolina 27616.

Shotwell Transfer Station II operates a construction debris transfer facility located at 1704 ½ North Salem Street, Apex, North Carolina 27502.

Shotwell Trucking is a limited liability company that owns the trucks used in connection with the hauling for the various companies and charges a fee for the use of those trucks.

Debris Removal Partners, LLC owns and operates a container and hauling company that primarily removes debris from construction sites.

Dynasty Holdings, LLC ("Dynasty") owns the property located at 5509 Thornton Road in Raleigh (the "Property"). Its only asset is the Property upon which Shotwell Transfer Station operates its transfer facility.

On October 6, 2008, Dynasty purchased the membership interests of Allied Installation, LLC. Allied Installation, LLC's only asset is the real property located at 424 Warehouse Drive, Raleigh, NC 27610 and upon which Capitol Waste C&D Transfer Station is operated.

On October 6, 2008, Shotwell Transfer Station purchased the membership interests of Capitol Waste Transfer, LLC. Capitol Waste Transfer, LLC only operates the Garner C&D Transfer Station, pursuant to NCDENR Permit Number 92-37-T.

On October 6, 2008, Debris Removal Partners, LLC purchased the membership interests of Capitol Waste Systems, LLC. Capitol Waste Systems, LLC's assets consist only of roll-off trucks and trash or containers used for pick-up of construction debris. Debris Removal Partners, LLC is in the process of merging Capitol Waste Systems, LLC into Debris Removal Partners, LLC and Debris Removal Partners, LLC will be the surviving entity.

ATTACHMENT B

DAVID W. KING, JR.
(Sole Shareholder)

