



ABTco, Inc.
Siding Division
P.O. Box 98, Highway 268, Roaring River, North Carolina 28669
(919) 696-2751



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November 23, 1999

Ms Cheryl Marks
NNCDENR- Division of Waste Management
401 Oberlin Road, Suite 150
Raleigh, NC 27605

Re: Groundwater at Industrial Landfill- Permit #97-03

Dear Ms Marks,

This letter is in response to your communication of October 27, 1999 regarding our Industrial Landfill. I shall try to address all your questions and concerns in this letter.

The materials used as boiler fuel has not changed and as such the waste analysis dated 1995 is still valid for our boiler ash. As you correctly note, this material could be incorporated as a soil amendment based upon the analysis conducted by the laboratory.

ABTCO is dedicated to waste minimization and beneficial reuse where practical. We are evaluating a compost system using ash, sludge and wood residue as well as land application of the ash. However, due to the abrasive nature, the presence of tramp materials which come in with the fuelwood, the low calcium carbonate equivalency and the low bulk density of the ash, there are many factors that are a challenge to overcome for the beneficial reuse of this product. Due to the current economics of high handling costs and low product value, landfilling continues to be the most viable option for the disposal of the ash.

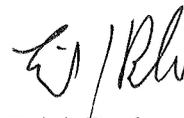
A tax map of the facility is included showing the area south and west of the landfill. I hope it is suitable for your needs and if it is not, please contact me and we will look further for other plot plans or topographical maps that might be available.

I understand that for future sampling events, April 2000, Oct 2000, etc. every 6 months, you would like to see analysis of the new upstream well, the two downstream wells and the surface water (spring) located south of the landfill at the toe of the slope. Analysis would be for the field and lab constituents listed in your letter. After four data sets have been collected (April 2001), the Division of Waste Management would conduct a review

of the data. At that time the decision would be made to determine that the unit is in compliance with Rule .0503(2)(d)(ii)(A) or that hydrologic modeling would have to be conducted to demonstrate compliance. The old upstream well which was determined to be too close to the waste and potentially under the influence of surface water shall no longer be sampled.

I hope that I have addressed all your questions and concerns to your satisfaction. If I have incorrectly interpreted your letter or the requirements of the Division, please let me know. If you have any further questions or concerns, please do not hesitate to contact me at my office.

Sincerely,

A handwritten signature in black ink, appearing to read 'EJ / Bl', written in a cursive style.

Erich Burke
Environmental Engineer

Cc: Jeff Traver
Mike Blosser