

State of North Carolina  
Department of Environment,  
Health and Natural Resources  
Division of Solid Waste Management

James B. Hunt, Jr., Governor  
Jonathan B. Howes, Secretary  
William L. Meyer, Director



October 26, 1994

Mr. Robert J. Waldrop  
ReUse Technology, Inc.  
100 Chastain Center Blvd. Suite 155  
Kennesaw, Georgia 30144

The Division of Solid Waste Management, (the "Division"), has received your Notification of a coal combustion by-product (ash) structural fill to be located near Freeman in Columbus County, N.C. and proposed to commence November 10, 1994.

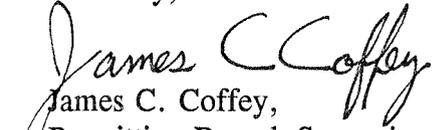
Please be aware that the size of a fill project is not a decisive factor in determining if the services of a NC licensed professional engineer (PE) is necessary on a coal ash structural fill. The Section 1700 Rules do specify that a proposed fill site which anticipates utilization of 10,000 Yd<sup>3</sup> or more of ash must include a PE approved Construction Plan in the Notification. Regardless of the volume of coal ash used in a structural fill project, the Closure Rule, 15A N.C. Administrative Code 13B .1706, requires certification signed and sealed by a PE that all rules in Section .1700 have been met. These rules include, among other things, Rule 1704 (a)(4) certification that no coal ash has been placed within two feet of the seasonal high groundwater table and certification under Rule 1705 (c) that the coal ash has been placed uniformly and compacted in lifts not exceeding one foot in thickness, compacted to standards including in-situ density, compaction effort and relative density, specified by a PE for a specific end use purpose. Rule .1705 (c) engineering specifications must be designated before commencement of the fill. Moreover, a PE cannot certify that these rules have been met unless he or she has been involved in the project from the beginning and has made periodic inspections of the work in progress.

Analyses of groundwater samples collected from monitoring wells located at a North Carolina coal ash structural fill site indicate that the ash may have caused or contributed to violation of the 15A N.C. Administrative Code 2L Standards for arsenic, cadmium, chromium, lead, and selenium, as well as elevated sulfate levels. Based upon this information, the Solid Waste Division strongly recommends that you retain the services of a qualified hydrogeologic consulting firm to assist you in determining the vulnerability of the groundwater at the site based on site attenuation, waste extractability and end use to inhibit infiltration and consider installation of groundwater monitoring wells on vulnerable sites before commencing fill operations.

Mr. Robert J. Waldrop  
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Copies of this letter are being sent to the Generators and Constructors, who are responsible for apprising the Owners of the land to be filled (if not the same party as the Generator/Constructor) of the Landowner's responsibility for groundwater contamination which may result from this coal ash structural fill.

Sincerely,

  
James C. Coffey,  
Permitting Branch Supervisor  
Solid Waste Section

cc: Bill Hocutt, Solid Waste Section

Steve Doyon  
Cogentrix Eastern Carolina Corporation  
P.O. Box 1063  
State Road 2202  
Lumberton, NC 28359  
Phone: (704) 525-3800

Steve Doyon  
Cogentrix Eastern Carolina Corporation  
P.O. Box 1848  
North Carolina Highway 87  
Elizabethtown, NC 28337  
Phone: (704) 525-3800



SW  
**ReUse Technology, Inc.**

PERMITTING • DISPOSAL PLANNING • REUSE



October 7, 1994

Mr. William Meyer  
State of North Carolina  
Department of Environment, Health, and Natural Resources  
Division of Solid Waste Management  
401 Oberlin Building  
Raleigh, North Carolina 27611-7687

Dear Mr. Meyer:

In accordance with Rule .1703 of 15A NCAC 13B, we are submitting written notice of a coal combustion by-product structural fill project. The details of the project are as follows:

**.1703(1)**

Coal combustion by-products will be used as structural fill to construct a landing strip for small aircraft. The project will be located at the intersection of SR 1836 and SR 1838 near Freeman, North Carolina in Columbus County. The attached 8 1/2 inch by 11 inch topographic map is marked to show the project location. This topographic map comes from the Freeman, North Carolina 7 1/2 minute series USGS quadrangle.

**.1703(2)**

The estimated start date is November 10, 1994. The estimated completion date is November 1, 1995.

**.1703(3)**

Approximately 9500 cubic yards of coal combustion by-products will be used in the project.

**.1703(4)**

Coal combustion by-products will be utilized from the Cogentrix facilities located in Lumberton and Elizabethtown, North Carolina. A representative TCLP analysis from each of these facilities is attached.

**.1703(5)**

The property owner's statement is attached.

**.1703(6)**

The coal combustion by-product generators are as follows:

CORPORATE OFFICE

100 Chastain Center Boulevard • Suite 155 • Kennesaw, Georgia 30144 • Phone 404 425-7676 • Fax 404 425-7681



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Mr. William Meyer  
October 7, 1994  
Page 2

Cogentrix Eastern Carolina Corporation  
P.O. Box 1063  
State Road 2202  
Lumberton, NC 28359  
Contact: Steve Doyon  
Phone: (704) 525-3800

Cogentrix Eastern Carolina Corporation  
P.O. Box 1848  
North Carolina Highway 87  
Elizabethtown, NC 28337  
Contact: Steve Doyon  
Phone: (704) 525-3800

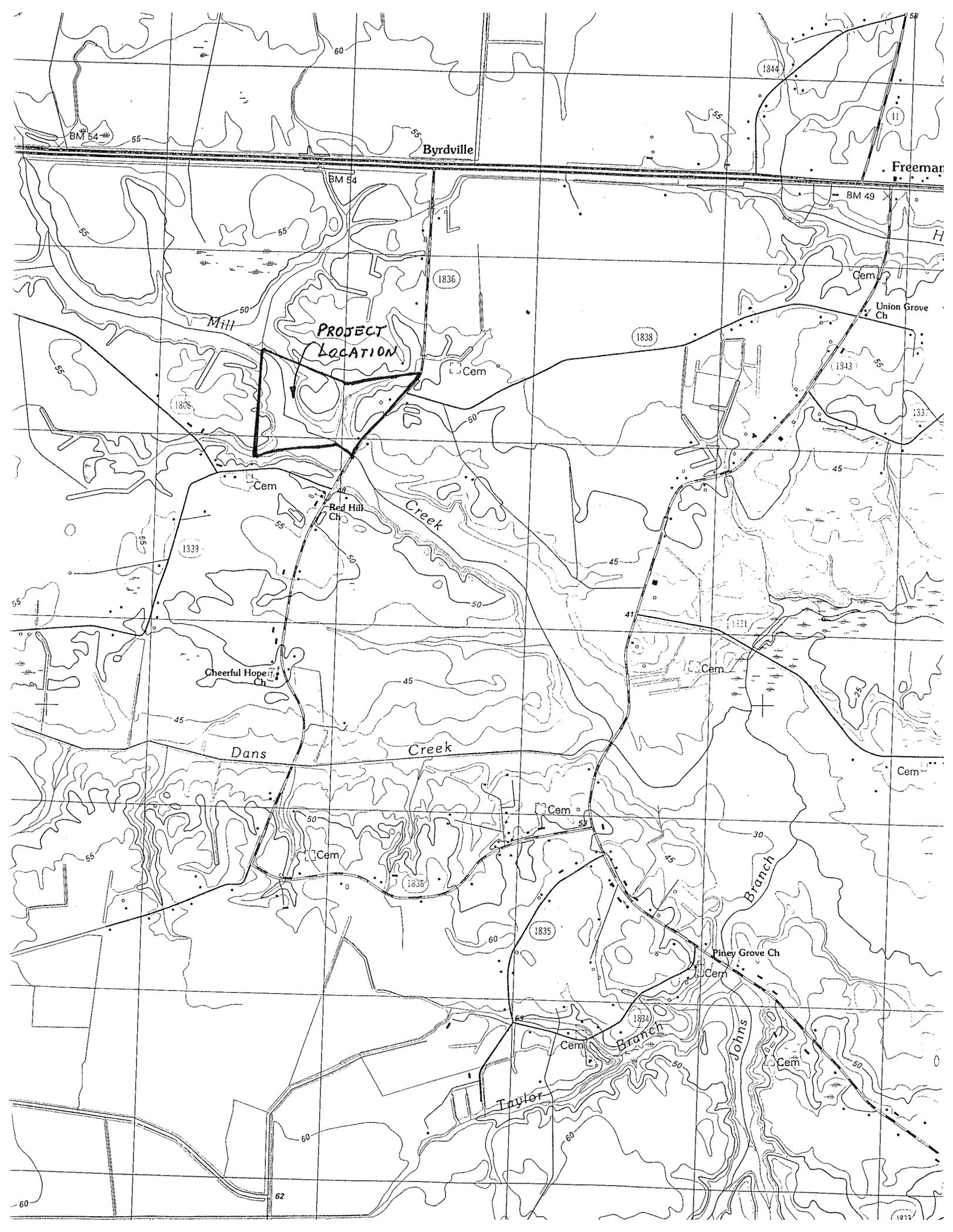
If there are any questions concerning this notice, please call me at (404) 425-7676.

Sincerely,



Robert J. Waldrop  
Vice President, Environmental

RJW/cmm  
Attachments  
By Federal Express  
cc w/att: Steve Doyon  
Virgil Hutchinson



Coal Combustion By-Product  
Structural Fill

Landowner's Statement of Consent

As the owner (or the owner's authorized representative) of land upon which ReUse Technology plans to construct a coal combustion by-product structural fill, I hereby acknowledge and consent to the use of coal combustion by-products as structural fill. If more than one thousand (1000) cubic yards of coal combustion by-products are utilized on this property, I agree to file a statement of the volume and locations of the coal combustion by-products with the Register of Deeds in the county or counties where the property is located in accordance with the requirements of 15A NCAC 13B.1707.

Property Location: West side of  
SR 1836 at SR 1838

Name: JAMES S. GRICE

Signature: James S. Grice

Date: 9-27-94

12/27/93

ReUse Technology  
 100 Chastain Center Blvd.  
 Suite 155  
 Kennesaw, Ga. 30144  
 Attn: Bob Waldrop

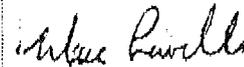
The following analytical results have been obtained for the indicated sample which was submitted to this laboratory.

Project Account Code: RT001  
 Location Code: Bob  
 Location Description: Lumberton  
 Date Sampled: 7/16/93  
 Laboratory Submittal Date: 8/4/93  
 Laboratory Batch #: 1656A

Parameter	Detection Level (mg/L)	Lumberton FA-01 RT06473
TCLP Metals:		
Arsenic	0.025	0.488
Barium	0.50	nd
Cadmium	0.015	nd
Chromium	0.05	nd
Mercury	0.0005	nd
Lead	0.005	nd
Selenium	0.025	0.278
Silver	0.03	nd
pH		6.33

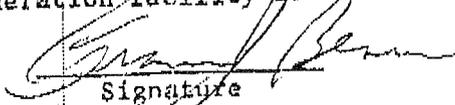
If there are any questions regarding this data, please call.

Sincerely,



Marc Lavelle  
 Assistant Lab Manager

I hereby certify that this TCLP analysis is representative of the coal combustion by-products from the Cogentrix cogeneration facility located in Lumberton, North Carolina.



Signature

PRES. COGENTRIX INC

## RT Environmental Services

A Division of ReUse Technology

12/27/93

ReUse Technology  
 100 Chastain Center Blvd.  
 Suite 155  
 Kennesaw, Ga. 30144  
 Attn: Bob Waldrop

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory.

Project Account Code: RT001  
 Location Code: Bob  
 Location Description: Elizabethtown  
 Date Sampled: 7/9/93  
 Laboratory Submittal Date: 8/4/93  
 Laboratory Batch #: 1656B

Parameter	Detection Level (mg/L)	Elizabethtown
		FA-02 RT06475
TCLP Metals:		
Arsenic	0.025	0.497
Barium	0.50	nd
Cadmium	0.015	nd
Chromium	0.05	nd
Mercury	0.0005	nd
Lead	0.005	nd
Selenium	0.025	0.309
Silver	0.03	nd
pH		6.55

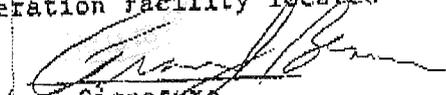
If there are any questions regarding this data, please call.

Sincerely,



Marc Lavelle  
 Assistant Lab Manager

I hereby certify that this TCLP analysis is representative of the coal combustion by-products from the Cogentrix cogeneration facility located in Elizabethtown, North Carolina.



Signature

PRES. COGENTRIX INC.



# ReUse Technology, Inc.

...progress today, with respect for tomorrow.

July 28, 1995

Mr. William Hocutt  
State of North Carolina  
Department of Environment, Health, and Natural Resources  
Division of Solid Waste Management  
P.O. Box 27687  
Raleigh, North Carolina 27611-7687

Re: Coal Combustion By-Product Structural Fill  
Freeman, North Carolina  
Columbus County

Dear Mr. Hocutt:

In accordance with 15A NCAC 13B .1706 (d), this notice of completion is submitted for the Freeman, North Carolina landing strip coal combustion by-product structural fill project. This certification is limited to the portion of the project for which the constructor, ReUse Technology, Inc., was responsible: siting, design, and construction to the point of completion of coal combustion by-product placement. ReUse Technology's portion of this project was completed in accordance with all applicable requirements of the Section .1700 rules.

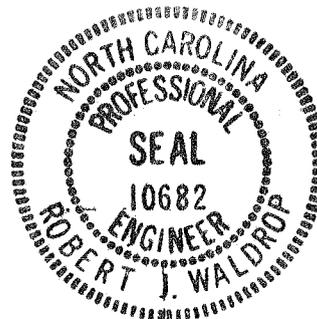
All cover and closure requirements are the responsibility of the owner and operator and therefore cannot be included in this certification.

Sincerely,

Robert J. Waldrop  
Vice President, Environmental

RJW/cmm

BARJW\DISK 4\HOCUTT3.LTR  
FILE 303.5.020.6.1



CORPORATE OFFICE

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