

*Bill Hocutt*

North Carolina  
Department of Environment and Natural Resources



Division of Waste Management

Michael F. Easley, Governor  
William G. Ross Jr., Secretary  
Dexter R. Matthews, Interim Director

July 5, 2001

Mr. Robert J. Waldrop, Vice President  
ReUse Technology, Inc.  
665 Molly Lane, Suite 100  
Woodstock, GA 30189

Fac/Perm/Co ID #	Date	Doc ID#
<i>Non-permitted</i>	<i>001051201</i>	<i>DIN 15269</i>

*CCB 0086*

- References:
- 1) May 4, 2001 Notification Letter From Mr. Robert Waldrop of ReUse Technology to William Hocutt of DENR. This letter stated that A Coal Combustion By-Products (CCBPs) Structural Fill (to be named The Brandywine Industrial Park) is proposed to be constructed in Nash County near Rocky Mount. Initial planned start date was 6/6/01 with completion estimated to be by 6/1/04.
  - 2) May 25, 2001 letter from Mr. James Coffey of DENR to Mr. Robert Waldrop of ReUse Technology listing needed changes, additions and explanations of information in Reference (1).
  - 3) June 22, 2001 letter from Mr. Robert Waldrop to William Hocutt responding to the requested information, changes and additions listed in Reference (2). The revised estimated start and completion dates submitted are 7/25/01 and 8/1/2004 respectively.

Dear Mr. Waldrop:

The Division of Waste Management has reviewed your May 4, 2001 Notification letter and your June 22, 2001 supplemental letter and acknowledge that, combined, these two communications satisfy the requirements of the Section .1703 rule for notification of proposed projects for beneficial use of coal combustion by-products.

Please contact me at 919-733-0692, extension #255 or Bill Hocutt at extension # 260 if you have any questions.

Sincerely,

*James C. Coffey*  
James C. Coffey, Acting Chief  
Solid Waste Section

cc: Mark Fry  
Jim Barber  
Tim Jewett  
Ben Barnes  
Bill Hocutt

c:/wp6docs/letters/ReUse-Brandywine-01.II.wpd

1646 Mail Service Center, Raleigh, North Carolina 27699-1646

Phone: 919-733-0692 \ FAX: 919-733-4810 \ Internet: www.enr.state.nc.us/

June 22, 2001

Mr. William R. Hocutt  
State of North Carolina  
Department of Environment and Natural Resources  
Solid Waste Section  
401 Oberlin Building  
Oberlin Road  
Raleigh, North Carolina 27611-7687

Re: Brandywine Industrial Park  
Nash County, North Carolina  
Notification for CCB Structural Fill Facility

Dear Mr. Hocutt:

In response to James C. Coffey's letter of May 25, 2001, we are resubmitting notice of construction of the subject coal combustion byproduct structural fill facility.

Following Mr. Coffey's letter, the following changes have been made:

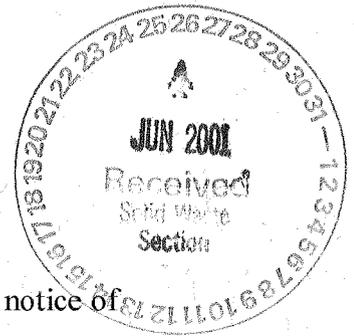
- (1) On drawing # C-1, please identify where the limits of the coal ash will be in the project.

A line has been added to the drawing and labeled "Limit of Ash Fill". This limit line along with the table of ash locational restrictions, which was already shown on the drawing, demonstrate compliance with applicable regulations.

- (2) On drawing # C-1, the two stockpiles of topsoil should be identified as the location and of configuration of two berms which are to be constructed (if that is the case).

As submitted, the drawing identifies these areas to be topsoil stockpiles. They are not intended to be permanent berms, but stockpiles for use in covering the project once ash fill has been completed. To clarify our intention, the stockpiles have been re-labeled "Stockpile to be Used as Ultimate Cover".

- (3) On drawing # C-1, the construction of the sediment basin may become sufficiently clear once the limits of the coal ash are added. If not, please provide a cross sectional drawing.



Mr. William R. Hocutt  
June 22, 2001  
Page 2

The limits of ash fill have been provided. Please note that this sediment pond is designed to contain all site runoff. As the drawings indicate, the water level in the pond will be maintained well below the outlet structure discharge elevation. As with all of our structural fill facilities, zero-discharge is assured by utilizing water from sediment ponds for dust control and compaction purposes.

- (4) On drawing # C-2, General Note # 26 states that in areas of the site where paving is to be applied that the 12 inches of compacted earth and the additional six inches of soil capable of sustaining vegetative growth will not be applied. This is not an available option. Where paving is to be applied, it will be necessary to place 18 inches of compacted earth prior to paving. This needs to be corrected on the drawing.

We must disagree with the statement that this is not an available option. Rule 15A NCAC 13B. 1708 (4) specifically allows for the placement of coal combustion by-products under paved roads with no requirement for 18 inches of earth fill.

However, we understand and agree with your concern of ash left uncovered for indefinite periods of time. Therefore, we have revised this note to indicate all ash fill areas are to be covered with earth unless they are to be paved within 30 working days of completion of fill.

In addition to the drawing changes mentioned above, we have also enclosed copies of the erosion control plan approval, the wetlands fill approval and a copy of the ground water elevation report. The fill volume has also been converted to tons. For further clarification 1 ton is equivalent to 1 CY of compacted coal combustion by-products. These terms are used interchangeably within the coal ash industry. Also as noted Mr. Coffey's letter, the start date has been delayed to provide for a second thirty-day notice period.

For your convenience, all of the submittal requirements of 15A NCAC 13B .1703 are repeated below:

**.1703 (a) (1)**

Coal combustion byproducts will be used as structural fill for the construction of Brandywine Industrial Park. The facility will be located in Nash County between US Highway 301 and State Road 1560. The enclosed 8-1/2 inch by 11-inch topographic map is marked to show the project location. This topographic map comes from the Drake, North Carolina 7-1/2 minute United States Geological Survey map.

Mr. William R. Hocutt  
June 22, 2001  
Page 3

**.1703 (a) (2)**

The estimated start date is July 25, 2001. The estimated completion date is August 1, 2004.

**.1703 (a) (3)**

Approximately 40,000 cubic yards of coal combustion byproducts will be utilized in the project.

**.1703 (a) (4)**

Coal combustion byproducts will be utilized from the Cogentrix facility located in Battleboro, NC. The enclosed TCLP analytical results are representative of all coal combustion byproducts to be used at the Brandywine Industrial Park project.

**.1703 (a) (5)**

The property owner's statement of consent is attached.

**.1703 (a) (6)**

The coal combustion byproduct generator is as follows:

Cogentrix of Rocky Mount, Inc.  
P.O. Box 370, Route 2  
State Road 1400  
Battleboro, North Carolina 27809  
Contact: Mark Casper  
Phone: (704) 525-3800

**.1703 (b)**

As required for projects utilizing more than 10,000 cubic yards of coal combustion byproducts, construction plans signed by a registered professional engineer are enclosed.

If there are any questions concerning this notice, please call Bob Waldrop at (770) 517-7017.

Sincerely,



Robert J. Waldrop  
Vice President

Enclosures

Cc w/att: Paul Oden

*Hearts*

North Carolina  
Department of Environment and Natural Resources



Division of Waste Management

Michael F. Easley, Governor  
William G. Ross Jr., Secretary  
William L. Meyer, Director

May 25, 2001

Mr. Robert J. Waldrop, Vice President  
ReUse Technology, Inc.  
665 Molly Lane, Suite 100  
Woodstock, GA 30189

Subject: May 4, 2001 Notification Letter of a proposed coal combustion by-products structural fill project named Brandywine Industrial Park to be located in Nash County, NC (near Rocky Mount). This project is planned to utilize approximately 40,000 cubic yards of fly ash with an estimated June 6, 2001 start date and planned for completion June 1, 2004.

Dear Mr. Waldrop:

The subject Notification letter and attachments have been reviewed by Jim Barber and myself. Jim is the Eastern Area Engineer in the Solid Waste Section. Several pieces of necessary additional information have been noted and are described below. Also, because some important design details were not present on the drawings we received we decided to investigate if an incorrect set of drawings were mailed with your letter.

Since the two engineering drawings received were prepared by the Stocks Engineering, P.A. firm, I telephoned Mr. Michael Stocks on May 23<sup>rd</sup> to inquire if there were other drawings which we should have received. He informed me that the two drawings identified as "Erosion & Sedimentation Control Plan for Brandywine Industrial Park - Nash County, N.C." were the only drawings that he had been commissioned to prepare for you. We are therefore requesting that the following changes be made on these two drawings and forwarded to us along with the four items of additional needed information that are listed in the subsequent section.

- On these two drawings, please make the following additions and changes:
- (1) On drawing # C-1, please identify where the limits of the coal ash will be in the project.
  - (2) On drawing # C-1, the two stockpiles of topsoil should also be identified as the location and of configuration of two birms which are to be constructed (if that is the case).
  - (3) On drawing # C-1, the construction of the sediment basin may become sufficiently clear once the limits of the coal ash are added. If not, please provide a cross sectional drawing.
  - (4) On drawing # C-2, General Note # 26 states that in areas of the site where paving is to be applied that the 12 inches of compacted earth and the additional six inches of soil capable of

Mr. Robert J. Waldrop  
May 25, 2001  
Page 2

sustaining vegetative growth will not be applied. This is not an available option. Where paving is to be applied, it will be necessary to place 18 inches of compacted earth prior to paving. This needs to be corrected on the drawing.

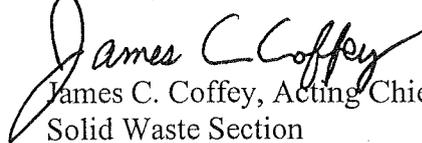
The following information or communications need to be furnished to the Solid Waste Section (SWS):

- (1) A copy of Land Quality Division approval of the erosion control plan.
- (2) General Note # 12 on Drawing C-2 states that the U.S. Corps of Engineers and the Division of Water Quality have approved the filling of the wetlands present on this site. A copy of one of those approvals is needed by the SWS.
- (3) Please supply the SWS with a copy of the soils report stating how the minimum of two foot separation from ground water was determined.
- (4) Your May 4, 2001 notification letter reports that an estimated 40,000 tons of coal ash is to be utilized in this project. Please convert these tons and report them in cubic yards.

The timing of a project can be delayed when there are changes, additions or explanations required after a letter of notification has been reviewed. The start and projected closure dates may need to be adjusted.

Please contact me at 919-733-0692, extension # 255 or Bill Hocutt at extension 260 if you have any questions about the contents of this letter.

Sincerely,

  
James C. Coffey, Acting Chief  
Solid Waste Section

cc: Mark Fry  
Jim Barber  
Bill Hocutt

c:/wp6docs/letters/ReUse.Brandywine

### COAL COMBUSTION BYPRODUCT STRUCTURAL FILL

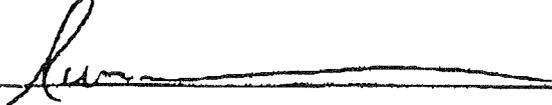
### LANDOWNER'S STATEMENT OF CONSENT

As the owner of land upon which ReUse Technology, Inc. plans to construct a coal combustion byproduct structural fill, I hereby acknowledge and consent to the use of coal combustion byproducts as structural fill material upon such property. If more than one thousand (1,000) cubic yards of coal combustion byproducts are utilized on this property, I agree to file a statement of the volume and locations of the coal combustion byproducts with the Register of Deeds in the county where the property is located in accordance with the requirements of 15A NCAC 13B.1707.

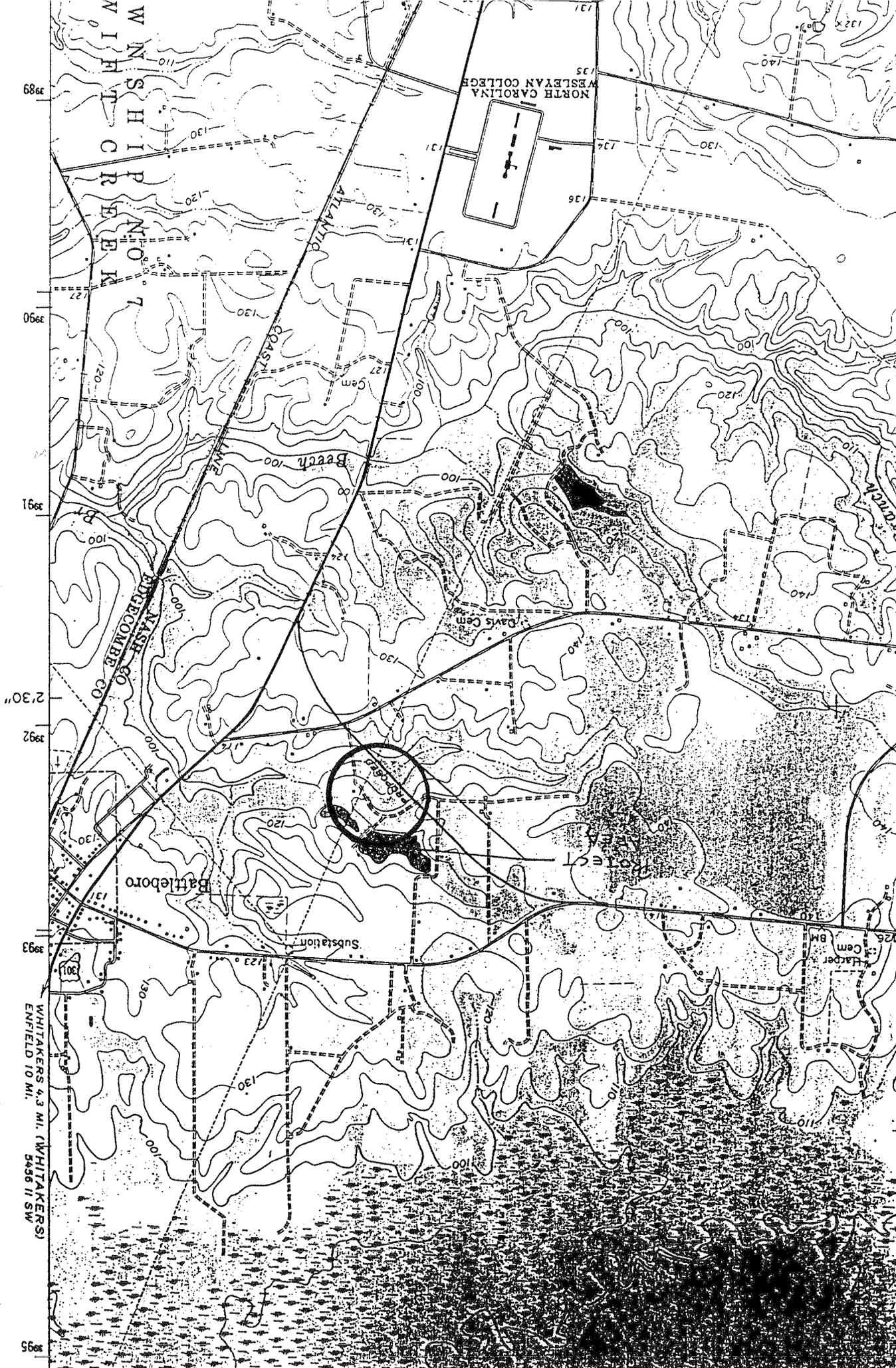
Property Location: HIGHWAY 4 / NASH Co

\_\_\_\_\_

Name: RUSSELL B. HOLDENESS AGENT FOR *G. BURTON HOLDENESS*  
INER S. HOLDENESS

Signature: 

Date: 5-1-01



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NORTH CAROLINA  
WESTERN COLLEGE

ATLANTIC  
COAST  
LINE

NASH  
CO  
DECOMBE  
CO

Beech

NASH  
CO  
DECOMBE  
CO

Battleboro

Substation

FOREST

WHITAKERS 4.3 MI. (WHITAKERS)  
ENFIELD 10 MI. 5456 11 SW

**U.S. ARMY CORPS OF ENGINEERS**  
**Wilmington District**

Action ID: 199920936 County: Nash

**GENERAL PERMIT (REGIONAL AND NATIONWIDE) VERIFICATION**

**Property**

Owner Russell and Mary Ann Holderness

Address Post Office Box 249  
Tarboro, NC 27886

Telephone Number 252-823-6164

**Authorized**

Agent Appian Consulting Engineers, PA  
Attn: Steve Stokes

Address 331 South White Street  
Wake Forest, NC 27587

Telephone Number 919-562-4673

**Size and Location of Property (waterbody, Highway name/number, town, etc.):** The property is approximately 31 acres in size and is located on the northeast side of NC Highway 4, approximately 0.5 mile west of US 301, in Battleboro, North Carolina. The site is adjacent to an unnamed tributary of Beech Branch, above headwaters, in the Tar-Pamlico River Basin.

**Description of Activity:** This permit authorizes mechanized landclearing, excavation, and the placement of fill associated with the construction of Brandywine Pond Industrial Park. Impacts to wetlands and waters authorized by this permit total 0.24 acre for fill for a building pad.

Applicable Law:  Section 404 (Clean Water Act, 33 USC 1344) only.  
 Section 10 (River and Harbor Act of 1899) only.

Authorization:  Regional General Permit Number  
 39  Nationwide Permit Number

Any violation of the conditions of the Regional General or Nationwide Permit referenced above may subject the permittee to a stop work order, a restoration order, and/or appropriate legal action. This Department of the Army Regional General Permit or Nationwide Permit verification does not relieve the permittee of the responsibility to obtain any other required Federal, State, or local approvals/permits. The permittee may need to contact appropriate State and local agencies before beginning work. If you have any questions regarding the Corps of Engineers regulatory program, please contact Todd Tugwell at telephone number (919) 876 - 8441 extension 26.

Regulatory Project Manager Signature 

Authorization Date December 1, 2000\* Expiration Date December 1, 2002

\* Please note that above date reflects the day the work was authorized due to lapse of 45-day review as outlined in the PCN notification requirements - see Condition 13, 65 Fed.Reg. 12893 (March 9, 2000).

**SURVEY PLATS, FIELD SKETCH, WETLAND DELINEATION FORM, ETC., MUST BE ATTACHED TO THE YELLOW (FILE) COPY OF THIS FORM, IF REQUIRED OR AVAILABLE.**

CF:

Permit Number: 199920936 – Nationwide Permit Number 39

Name of Permittee: Russell and Mary Ann Holderness

Project Manager: Todd Tugwell

Issuance: December 1, 2000

Upon completion of the activity authorized by this permit and any mitigation required by the permit, sign this certification and return it to the following address:

**US ARMY CORPS OF ENGINEERS  
RALEIGH REGULATORY FIELD OFFICE  
6508 FALLS OF NEUSE ROAD, SUITE 120  
RALEIGH, NORTH CAROLINA 27615**

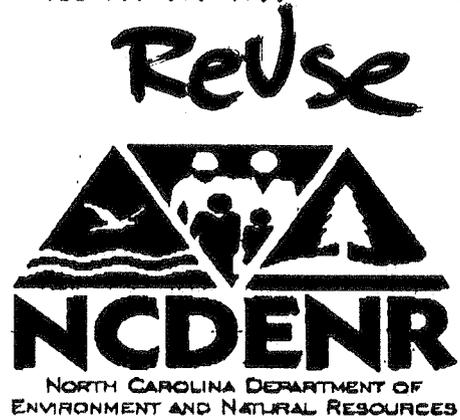
Please note that your permitted activity is subject to a compliance inspection by an U.S. Army Corps of Engineers representative. If you fail to comply with this permit you are subject to permit suspension, modification, or revocation.

I hereby certify that the work authorized by the above referenced permit has been completed in accordance with the terms and condition of the said permit, and required mitigation was completed in accordance with the permit conditions.

\_\_\_\_\_  
Signature of Permittee

**State of North Carolina  
Department of Environment  
and Natural Resources  
Raleigh Regional Office**

**Michael F. Easley, Governor  
William G. Ross, Jr., Secretary**



**DIVISION OF LAND RESOURCES  
LETTER OF APPROVAL  
May 18, 2001**

Russell & Mary Ann Holderness  
P.O. Box 249  
Tarboro, N.C. 27886

Re Use Technology, Inc.  
c/o Paul Oden  
P.O. Box 1179  
Rocky Mount, N.C. 27802

RE: Project Name: Brandy Wine Industrial Park  
County: Nash  
Submitted by: Stocks Engineering, P.A.  
Date Received: 4-30-01  
Date Processing Initiated: 4-30-01  
Watershed: Tar-Pamlico #1: 03-03-02  
New Submittal (x) Revised ( )

Dear Mr. & Mrs. Holderness:

This office has reviewed the subject Erosion and Sedimentation Control Plan. We find the plan to be acceptable and hereby issue this letter of approval. If any modifications, performance reservations, or recommendations are applicable, a list is enclosed and is incorporated as a part of this letter of approval. The enclosed Certificate of Approval should be posted at the job site. In addition, it should be noted that this plan approval shall expire three (3) years following the date of approval, if no land-disturbing activity has been undertaken, in accordance with Title 15A, North Carolina Administrative Code (NCAC) 4B.0029.

If any modifications are not incorporated into the plan and implemented in the field, the site will be in violation of the Sedimentation Pollution Control Act of 1973 (North Carolina General Statute (NCGS), 113A-61.1).

15A NCAC 4B.0018(a) requires that a copy of the approved plan be on file at the job site. Also, this letter gives the notice required by NCGS 113A-61.1(a) concerning our right to perform periodic inspections to ensure compliance with the approved plan.

Mr. & Mrs. Holderness  
May 18, 2001  
Page 2

North Carolina's sedimentation pollution control program is performance oriented, requiring protection of the natural resources and adjoining properties. If at any time during this project it is determined that the Erosion and Sedimentation Control Plan is inadequate to meet the requirements of the Sedimentation Pollution Control Act of 1973 (NCGS 113A-51 through 66), this office may require revisions in the plan and its implementation to ensure compliance with the Act.

Acceptance and approval of this plan is conditioned upon your compliance with applicable federal and state water quality laws, regulations and rules. This could include the Division of Water Quality under stormwater or other specific water quality standards, and the U.S. Army Corps of Engineers under Article 404 jurisdiction. Our approval does not supersede any other required permit or approval.

Since this project disturbs five or more acres, one such approval relates to the stormwater that will discharge from your project. This runoff is permitted pursuant to the National Pollutant Discharge Elimination System (NPDES) administered in North Carolina by the Division of Water Quality (DWQ). Attached is the General Stormwater NPDES Permit, NCG010000, as revised July 1, 1995, covering your activity. You are responsible for complying with the General Permit requirements and are subject to enforcement by DWQ for any violations of the General Permit.

Due to the location of this project, it should be noted that a rule to protect and maintain existing buffers along watercourses in the Tar-Pamlico River Basin became effective on January 1, 2000. The Tar-Pamlico River Riparian Area Protection and Maintenance Rule (15A NCAC 2B .0259) applies to all perennial and intermittent streams, lakes, ponds and estuaries in the Neuse River Basin with existing vegetation on the adjacent land or "riparian area". In riparian areas with existing vegetation in the first 30 feet directly adjacent to the stream, the rule prohibits land disturbance or new development within the first 30 feet of land next to the water (the remaining 20 feet of the total buffer must be revegetated upon completion of any proposed land-disturbing activity). In riparian areas with existing vegetation that is less than 30 feet wide, the rule prohibits land disturbance or new development within the area that contains the existing vegetation (but not the entire 50 foot riparian area). For more information about this riparian area rule, please contact the Division of Water Quality's Wetland/401 Unit at 919-733-1786, or a Division of Water Quality representative at this regional office.

Please note that this approval is based in part on the accuracy of the information provided concerning financial responsibility. You are requested to file an amended Financial Responsibility Form if any changes become necessary. In addition, it would be helpful if you would notify this office when the proposed land-disturbing activity covered by this plan is initiated.

Your cooperation is appreciated and we look forward to working with you on this project. If there are any questions, please do not hesitate to contact this office.

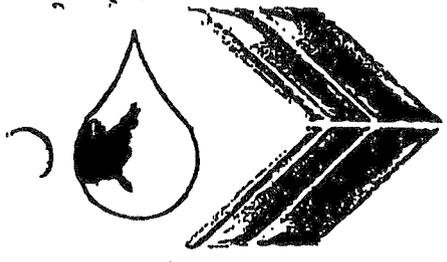
Sincerely,



Wyatt Brown  
Assistant Regional Engineer  
Land Quality Section  
Raleigh Regional Office

WHD:gmp

cc: Michael Stocks, P.E., Stocks Engineering P.A.  
Mr. Ken Schuster, P.E.



# ATLANTIC ENVIRONMENTAL LABORATORY, INC.

Analytical Testing - Serving Industry,  
Government, Real Estate, Research and Development  
825 GROVE RD., SUITE 14, MIDLOTHIAN, VIRGINIA 23113  
(804) 378-0900 FAX (804) 378-7719

R007-210  
01/24/01

January 24, 2001

Dr. Paul Chu  
A&L Eastern Agricultural Laboratories, Inc.  
7621 Whitepine Rd.  
Richmond, Virginia 23237

REUSE TECHNOLOGY INC  
TOM SNOW  
101 FOUNTAIN PARK RD  
ROCKY MOUNT, NC 27802

Re: TCLP Metals of Ash Sample No. A&L 40214 COGENTRIX ROCKY MT. - RMTFA-1

Samples Received: January 17, 2001  
Extraction Date: January 18, 19, 2001  
Method: SW-846-1311

## CERTIFICATE OF ANALYSIS

AEL Sample ID	TCLP Metals	Result (mg/L)	Regulatory Concentration	Date Analyzed	Analyst
7070	Arsenic	< 0.10	5.0 mg/L	01/23/01	KE
	Barium	< 0.10	100.0 mg/L	01/23/01	KE
	Cadmium	< 0.10	1.0 mg/L	01/23/01	KE
	Chromium	< 0.10	5.0 mg/L	01/23/01	KE
	Lead	< 0.10	5.0 mg/L	01/23/01	KE
	Mercury	< 0.01	0.2 mg/L	01/23/01	KE
	Selenium	< 0.10	1.0 mg/L	01/23/01	KE
	Silver	< 0.10	5.0 mg/L	01/23/01	KE

mg/L = milligrams per liter

I hereby certify that this TCLP analysis is representative of the coal combustion by-products produced by the Cogentrix Cogeneration facility in Battleboro, North Carolina.

Signed: Mark A. Cash

*K. R. Elmendorf*  
K. R. Elmendorf  
Manager, Analytical Services

# RECEIVED

JAN 29 2001

REUSE TECHNOLOGY  
ROCKY MOUNT, N. C.



# ATLANTIC ENVIRONMENTAL LABORATORY, INC.

Analytical Testing - Serving Industry,  
Government, Real Estate, Research and Development  
825 GROVE RD., SUITE 14, MIDLOTHIAN, VIRGINIA 23115  
(804) 378-0900 FAX (804) 378-7719

R007-207  
01/24/01

January 24, 2001

Dr. Paul Chu  
A&L Eastern Agricultural Laboratories, Inc.  
7621 Whitepine Rd.  
Richmond, Virginia 23237

REUSE TECHNOLOGY INC  
TOM SNOW  
101 FOUNTAIN PARK RD  
ROCKY MOUNT NC 27802

Re: TCLP Metals of Ash Sample No. A&L 40211 COGENTRIX ROCKY MT - RMTBA-1

Samples Received: January 17, 2001  
Extraction Date: January 17, 18, 2001  
Method: SW-846-1311

## CERTIFICATE OF ANALYSIS

AEL Sample ID	TCLP Metals	Result (mg/L)	Regulatory Concentration	Date Analyzed	Analyst
7073	Arsenic	< 0.10	5.0 mg/L	01/23/01	KE
	Barium	< 0.10	100.0 mg/L	01/23/01	KE
	Cadmium	< 0.10	1.0 mg/L	01/23/01	KE
	Chromium	< 0.10	5.0 mg/L	01/23/01	KE
	Lead	< 0.10	5.0 mg/L	01/23/01	KE
	Mercury	< 0.01	0.2 mg/L	01/23/01	KE
	Selenium	< 0.10	1.0 mg/L	01/23/01	KE
	Silver	< 0.10	5.0 mg/L	01/23/01	KE

mg/L = milligrams per liter

I hereby certify that this TCLP analysis is representative of the coal combustion by-products produced by the Cogentrix Cogeneration facility in Battleboro, North Carolina.

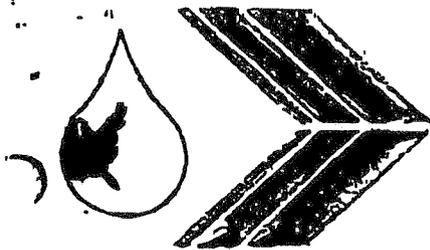
Signed: Mark A. Casper

*K.R. Elmendorf*  
K. R. Elmendorf  
Manager, Analytical Services

RECEIVED

JAN 24 2001

REUSE TECHNOLOGY INC  
ROCKY MOUNT, NC



# ATLANTIC ENVIRONMENTAL LABORATORY, INC.

Analytical Testing - Serving Industry,  
Government, Real Estate, Research and Development  
825 GROVE RD., SUITE 14, MIDLOTHIAN, VIRGINIA 23113  
(804) 378-0900 FAX (804) 378-7719

R007-211  
01/24/01

January 24, 2001

Dr. Paul Chu  
A&L Eastern Agricultural Laboratories, Inc.  
7621 Whitepine Rd.  
Richmond, Virginia 23237

REUSE TECHNOLOGY INC  
TOM SNOW  
101 FOUNTAIN PARK RD  
ROCKY MOUNT, NC 27802

Re: TCLP Metals of Ash Sample No. A&L 40215

COGENTRIX ROCKY MT. - RMTSCR-1

Samples Received: January 17, 2001  
Extraction Date: January 18, 19, 2001  
Method: SW-846-1311

## CERTIFICATE OF ANALYSIS

AEL Sample ID	TCLP Metals	Result (mg/L)	Regulatory Concentration	Date Analyzed	Analyst
7069	Arsenic	< 0.10	5.0 mg/L	01/23/01	KE
	Barium	< 0.10	100.0 mg/L	01/23/01	KE
	Cadmium	< 0.10	1.0 mg/L	01/23/01	KE
	Chromium	< 0.10	5.0 mg/L	01/23/01	KE
	Lead	0.16	5.0 mg/L	01/23/01	KE
	Mercury	< 0.01	0.2 mg/L	01/23/01	KE
	Selenium	< 0.10	1.0 mg/L	01/23/01	KE
	Silver	< 0.10	5.0 mg/L	01/23/01	KE

mg/L = milligrams per liter

I hereby certify that this TCLP analysis is representative of the coal combustion by-products produced by the Cogentrix Cogeneration facility in Battleboro, North Carolina.

Signed: Mark A. Cook

*K. R. Elmendorf*  
K. R. Elmendorf  
Manager, Analytical Services

RECEIVED

JAN 23 2001

ATLANTIC ENVIRONMENTAL LABORATORY, INC.