

North Carolina
Department of Environment and Natural Resources

BRANDYWINE FILE



Division of Waste Management

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

October 11, 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>unpermitted</i> <i>CCB 0256</i> | <i>10/05/2001</i> | <i>DIN 15273</i> |

Subject: Brandywine Industrial Park Coal Ash Structural Fill to be located in Nash County on NC Highway 4 near the U.S. Highway 301/ NC Highway 4 intersection at Battleboro (Rocky Mount), NC.

Dear Mr. Waldrop:

The Permitting Branch is currently developing a summary report on the coal combustion by-product (CCBP) structural fills constructed since January 4, 1994 when Section .1700 of the 15A NCAC 13B Rules went into effect. Concurrent with that effort, we have begun field visits to projects that are under construction. This has resulted in our learning of some procedures that are being used which are objectionable. The purpose of this letter is to acquaint you with some of this information.

The Division of Waste Management has become aware that some constructors of CCBP structural fills have been doing excessive excavation on their projects. As you know, with your having been very involved in the writing of the Section .1700 15A NCAC 13B Solid Waste Management Rules, these rules were written without any excessive excavation being anticipated. After grubbing and clearing the site, removing and stockpiling the top 1 -2 feet of soil containing organic materials is understood as a necessary step in achieving a satisfactory foundation. This also is a good source of the top six inches of final cover soil for supporting vegetative growth and combating erosion. However, the Division does not consider obtaining additional soil for use as cover as a necessary factor for making these CCBP fills economically attractive. The negative effects can be very large, one being the possibility of seriously compromising the two foot required separation between the groundwater seasonal high level and the ash. This also can make determination of the resulting actual separation distance very difficult. The second large negative effect is the difficulty in explaining how any increased capacity of the site for ash was not an objective of excavating.

On October 9, 2001, Jim Barber, Ben Barnes and I visited the Brandywine site and also the Highway 301-Swift Creek site. We were able to get a good impression of the Brandywine lay out from the construction plan and limits defined by the lake, fences and site contours. We talked with your foreman at the Swift Creek Site and he explained to us about the closure that is

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Robert J. Waldrop
October 11, 2001
Page 2

underway there and that the closure will be completed within the next two months. After the Swift Creek site is completed, he said that work is to begin on Brandywine Industrial Park.

The revised starting date for the Brandywine Industrial Park given in your June 22, 2001 letter was July 25, 2001, but since that date is no longer appropriate, we would appreciate your giving a new starting date and a new estimated date for completion. We would also appreciate your contacting us a few days before the site will be ready for placement of the first ash. We would like to visit the project site at that time.

Sincerely,



William R. Hocutt

cc: Jim Coffey
Jim Barber
Ben Barnes
Tim Jewett

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