



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

Fac/Perm/Co ID #	Date	Doc ID#
Non-permitted	0010512011	DIN 15265

CC B0056

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

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

Phone: 919-733-0692 \ FAX: 919-733-4810 \ Internet: [www.enr.state.nc.us/](http://www.enr.state.nc.us/)

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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.

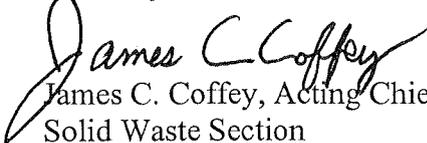
The following information or communications need to be furnished to the Solid Waste Section (SWS):

- ✓ (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



665 Molly Lane  
Suite 100  
Woodstock, Georgia 30189  
770.517.7017  
fax 770.517.9689

May 4, 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 accordance with Rule .1703 of 15A NCAC 13B, we are submitting notice of the construction a coal combustion byproduct structural fill facility. The details of the project as required by this Rule are as follows:

**.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.

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

The estimated start date is June 6, 2001. The estimated completion date is June 1, 2004.

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

Approximately 40,000 tons of coal combustion byproducts will be utilized in the project. (40,000 yd<sup>3</sup>)

**.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.

*progress today, with respect for tomorrow. . .*

Mr. William R. Hocutt  
May 4, 2001  
Page 2

**.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,

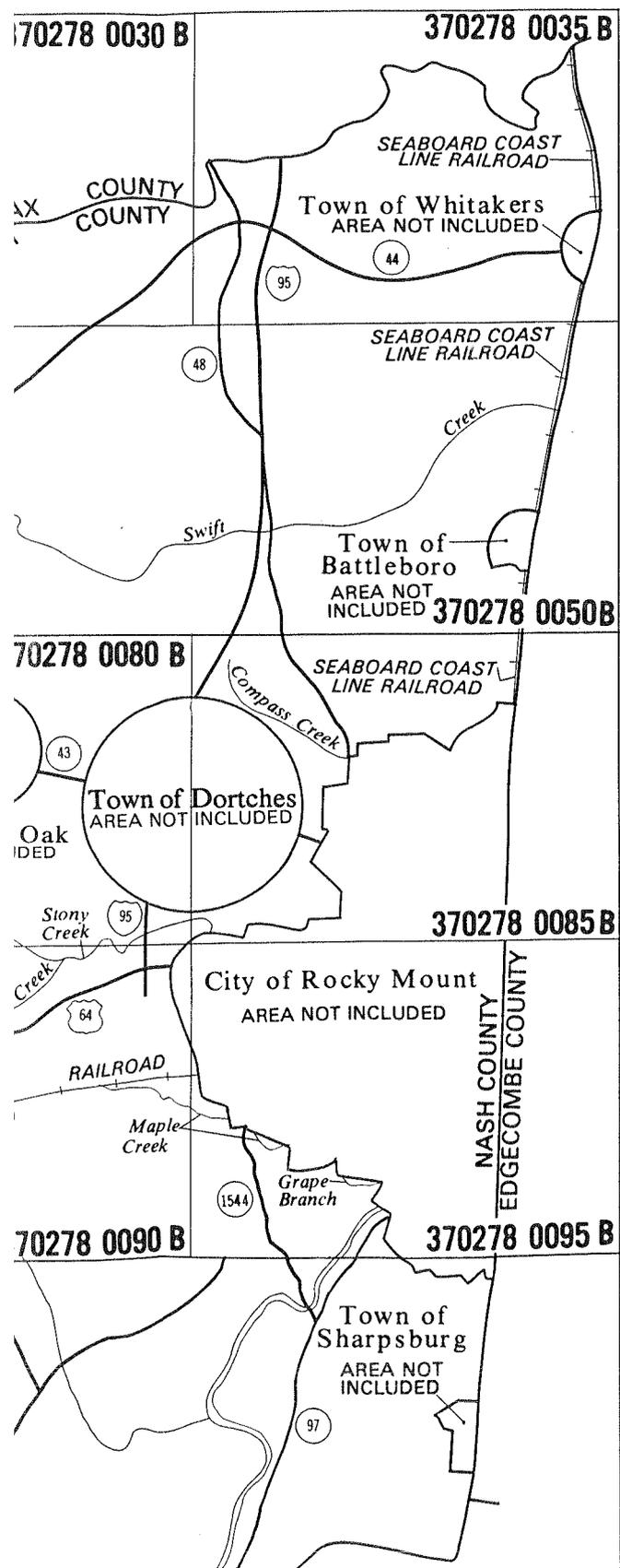


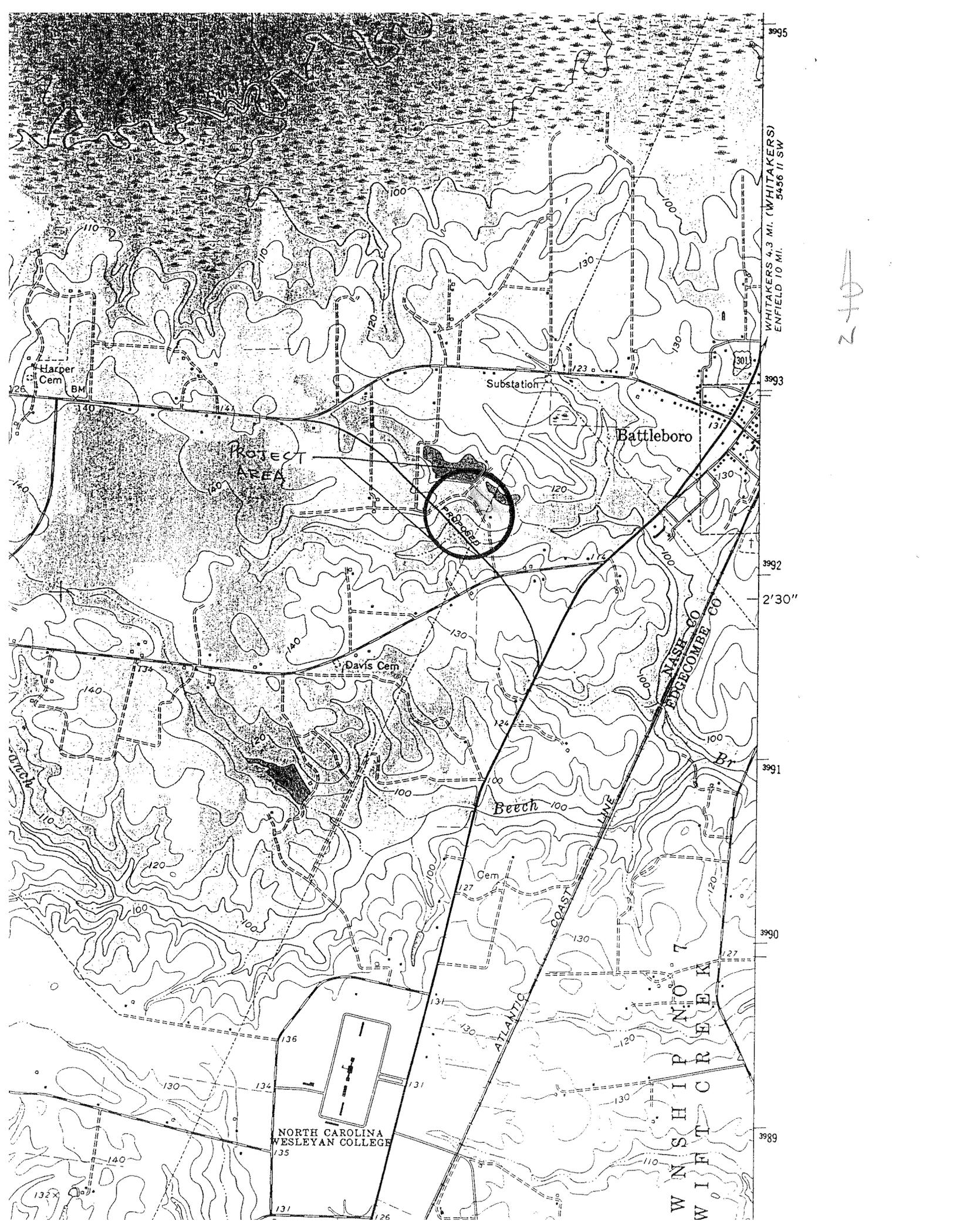
Robert J. Waldrop  
Vice President

Enclosures

By Federal Express

Cc w/att: Mark Casper  
Paul Oden





WHITAKERS 4.3 MI. (WHITAKERS)  
ENFIELD 10 MI.



PROTECT  
AREA



3995  
3993  
3992  
2'30"  
3991  
3990  
3989

NORTH CAROLINA  
WESLEYAN COLLEGE  
135

WINSHIPP NO 7  
WIFEK

Battleboro

Beech

ATLANTIC  
COAST

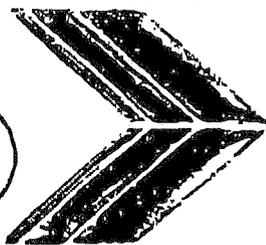
NASH CO  
EDGECOMBE CO

Substation

Davis Cem

Harper  
Cem  
BM

132 X



# ATLANTIC ENVIRONMENTAL LABORATORY, INC.

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 825 GROVE RD., SUITE 14, MIDLOTHIAN, VIRGINIA 23113  
 (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.

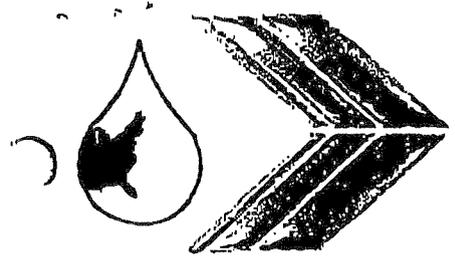
Signed: Mark A. Casper

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

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JAN 28 2001

REUSE TECHNOLOGY INC  
 ROCKY MOUNT, NC



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Analytical Testing - Serving Industry,  
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825 GROVE RD., SUITE 14, MIDLOTHIAN, VIRGINIA 25113  
(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.

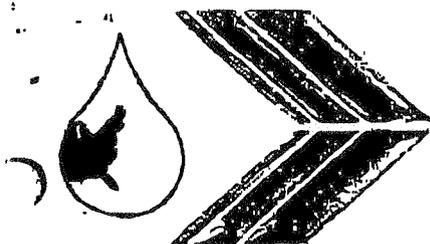
Signed: \_\_\_\_\_

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

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JAN 29 2001

REUSE TECHNOLOGY  
ROCKY MOUNT, N. C.



# ATLANTIC ENVIRONMENTAL LABORATORY, INC.

Analytical Testing - Serving Industry,  
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 825 GROVE RD., SUITE 14, MIDLOTHIAM, 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. Casper

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

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JAN 27 2001

COGENTRIX ROCKY MOUNT, NC

**COAL COMBUSTION BYPRODUCT  
STRUCTURAL FILL**

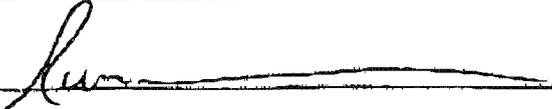
**LANDOWNER'S STATEMENT OF CONSENT**

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 JANE S. HOLDENESS *G. BURTON HOLDENESS*

Signature: 

Date: 5-1-01

To: BEN BARNES, RALEIGH R. O.  
Solid Waste Section

Post-it® Fax Note	7671	Date	7/20/01	# of pages	2
To	BEN BARNES	From	Bill Hocutt		
Co./Dept.	NC DENR	Co.	NC DENR		
Phone #	919-591-4700 EXT 299	Phone #	733-0662 EXT 260		
Fax #	591-2718	Fax #	733-4810		

July 20, 2001

Ben:

Here is the map that Bob Waldrop provided with his May 4, 2001 Notification of the Brandywine Industrial Park coal ash fill project near Rocky Mount and Battleboro. Jim Coffey's May 25, 2001 letter specified what additional information, explanations, etc were needed by DWM. Waldrop's reply was dated June 22<sup>nd</sup> and our last letter (July 5, 2001) back to Waldrop gave him a green flag to proceed with the project. That was a little over two weeks ago, so he may have started the project by now as you are suspecting.

We talked today (7/20) and I tried to give you directions to the site using Waldrop's map. However, the roads are mostly not identified or numbered and I was not able to do a decent job of giving you directions. I hope that you found it. Maybe the attached map will help you if you need to try again to find the site. Thanks for you help on these projects.

*Bill*  
Bill Hocutt