

AGENDA

NCDENR Division of Waste Management And ReUse Technology, Inc.

Swift Creek Coal Combustion By-Product Project Nash County

February 6, 2003

- I. Report of Completed Activities – Bob Waldrop
 - Stockpile
 - Grading and Cover
 - Consolidation Plat and As-Built Map
 - Drainage Pipe – Investigation of location and construction

- II. Hydrogeology Study – Jack Sherrill
 - Methodology
 - Findings

- III. Future Activities (Conceptual) – Bobby Joyner

Fac/Perm/Co ID.#	Date	Doc ID#
<i>Non-permitted</i>	<i>2/01/03</i>	DIN 1527
<i>CCB 00587</i>		

Attendees:

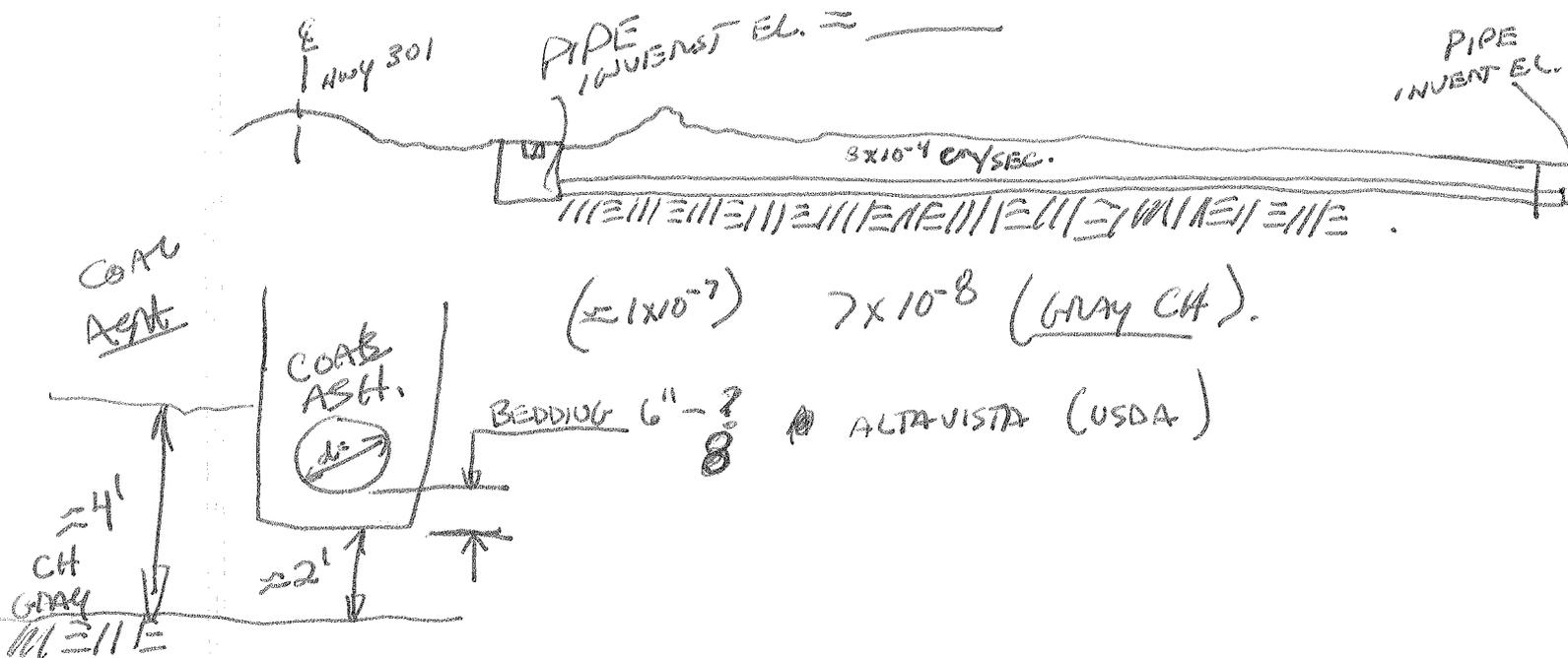
Bobby Joyner, Appian Consulting Engineers
Jack Sherrill, Sherrill Environmental, Inc.
Bill White, Moore and Van Allen
Bob Waldrop, ReUse Technology, Inc.

MARK POENDEKER
PETER SOKALSKI
JIM BARBER
JIM COFFEY
Nancy Scott
Ben Barnes
MARK Fry
Bob Waldrop
Bill White
Bill Hocutt
Jack Sherrill
Bobby L. Joiner
Brent Rockett

Agency
DWM
Appian Consulting Eng.
DWM/SWS
DWM/SWS
AGO/SWS
DWM/SWS
DWM/SWS
ReUse Technology
MOORE + VAN ALLEN
DWM/SWS
Sherrill Environmental, Inc
Appian Consulting Eng'g
NC DWM, SWS

REMOVED ASA STOCKPILE ON-SITE TO PROJECT IN VA.
(100± TONS?)

NEW PIPE INSTALLED FOR SURFACE WATER CONVEYANCE
PARALLEL TO ROAD.



Nash-3

Nash County.; Brandywine Industrial Park;
Cogentrix, Rky. Mt.; ReUse Technology; G.B.& I.S. Holderness;
July 25, 2001; August 1, 2004;

The Division received a Notification letter dated May 4, 2001 with estimated starting and completion dates six weeks to two months earlier than those shown in the above Legend. Those original dates required revision when a delay was experienced obtaining revisions and required additional information. The supplementary information and changes were necessary in order to anticipate that the project would be according to the .1700 15A NCAC 13B Rules when constructed as proposed. The CCBP generating site is identified as Cogentrix, Rocky Mount rather than Battleboro since the town of Battleboro has been annexed by Rocky Mount. ReUse Technology occasionally calls the site Battleboro.

An estimated 40,000 tons of CCBPs were to be utilized in this project and representative TCLP data was submitted. A statement of consent for the use of CCBPs on the landowner's property and a promisory note by the landowner to record the volume and location of the CCBPs with the County Register of Deeds were submitted. Since 10,000 or more cubic yards of ash were to be utilized, construction plans were also submitted. An 8 ½ X 11 topographic map which came from a 7 ½ minute USGS survey map was submitted. The map was marked showing the location of the project.

On May 25, 2001, the Division issued a letter to the constructor (ReUse Tech.) that identified four construction plan alterations, three attachments and a clarification that were needed. The Division challenged the constructor's stated plan to not install the required cover (one foot of compacted cover soil plus the additional specified six inches of soil suitable for supporting plant growth) in areas where paving was to be applied. The Division countered, that instead, the amount of compacted cover soil was to be increased from 12" to 18" without any fertile soil required.

Bob Waldrop of ReUse Technology responded on June 22nd, furnishing all requested changes and additions with the exception of agreeing to applying cover on areas to be paved. He argued that the .1708(4) "Other Use" Rule did not specify any cover requirement for CCBP structural fill for the base, sub-base, under a structure or the footprint of a paved road, a parking lot, sidewalk, walkway or similar structure. A compromise was reached where no soil cover was to be required in areas that received pavement cover within a 30 working days of completion of fill. If the paving had not occurred by that time, then the 12" compacted soil plus 6" of fertile soil would be added.

The following requested items were included by ReUse in the June 22nd response: (1) a copy of the erosion control plan approval by the Division of Land Resources, (2) a copy of the U. S. Army Corps of Engineers approval for filling 0.24 acre of wetlands and (3) a copy of an August 9, 1998 groundwater table investigation of the site by Sherrill Environmental, Inc. (SEI).

The supplied (SEI) groundwater table investigation involved four 3' wide X 3.5' deep X 10' long ditches that were excavated in an area of the site where there might be a potential for a high water table. Three of these ditches had soil types that suggested the seasonal high water table to perhaps be less than 1 foot from the surface. The fourth ditch had soil types that suggested the seasonal high water table might be at a depth of 2.4 feet from the surface. The Permitting Branch transposed the locations of these ditches from the SEI Report map to the revised construction

Nash-3 (cont'd)

plan. It was found that the three ditch sites exhibiting soils suggesting seasonal high water of less than one foot beneath the surface were all within the region of the project where coal ash was to be placed. For the project to proceed this area would require enough compacted soil to be added to create the required two feet separation between the seasonal high groundwater level and the ash. It is anticipated that approximately one foot of soil will be removed over the entire area that is to receive fill. This is done to remove soil containing decomposable organic matter. The amount of soil needed therefore becomes a minimum of two feet. Surprisingly, the revised construction plan included an unsolicited notation that a minimum of two feet of soil is to be added in a newly designated high groundwater table area of the plan. It is important to note that probably none of this extremely important problem that needed correction would have come to light had a copy of the soil report not been requested. The existence of the report could have been easily overlooked due to the manner that it was mentioned on the initial construction plan. The request for a plan revision to define the limit of ash fill was also critical to this problem correction. The ditch with soils that suggested the 2.4 foot depth seasonal high water table was found to be outside the region of the project where coal ash was to be placed. Therefore, this location within the project did not require placement of additional soil.

The 0.24 acre wetlands feature was identified on the initial construction plan that was received with the May 4, 2001 Notification. However, on this initial construction plan the notation for the wetland feature simply stated "0.24 WETLAND AREA PERMITTED TO BE FILLED". On the revised construction plan received with the June 22nd ReUse response letter, the wetland feature notation was revised to state "0.24 WETLAND AREA PERMITTED TO BE FILLED (WILL BE FILLED WITH 2.0' OF SAND CLAY BORROW)". The word AREA is not correct, it should be ACRE in both notations.. This refinement of specifying the type and amount of fill was not solicited by the SWS. Those additions may have been (at least to some degree) influenced by the presence of a specified amount of fill soil that was shown to be necessary due to the SEI report discussed previously.

On October 9, 2001, Jim Barber, Ben Barnes and Bill Hocutt visited the Brandywine and the Highway 301-Swift Creek sites. These visits were in connection with a summary report being prepared on CCBP structural fills constructed since January 4, 1994. That date is when Section .1700 of the 15A NCAC 13B Rules went into effect. A letter was mailed to ReUse Technology on October 11, 2001 informing Robert Waldrop of these visits and other information. Work had not begun on the Brandywine site and closure activities were underway at the Swift Creek site. The foreman at Swift Creek estimated that closure would be completed in two months and work would then begin at the Brandywine Project. Revised starting and estimated completion dates for the Brandywine project were requested in the October 11 letter to Robert Waldrop.

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Nash-3

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COMPLETION OF THIS FILE SHOULD BE DONE AFTER AN OCTOBER SITE VISIT BY JIM BARBER AND BILL HOCUTT.

NASH 3

Nash County

address
Administration Building
120 W. Washington Street
Nashville, NC 27856

fax number
459-9817

Web site address
co.nash.nc.us

population 92,369
county seat Nashville
area code 252

1st & 2nd Congressional Districts
10th Senate District
7th, 20th, 70th, 71st & 72nd
Representative Districts
Upper Coastal Plain
Council of Governments

County Officials

Clerk of Court* 459-4081

Rachel M. Joyner
PO Box 759

Register of Deeds* 459-9825

Barbara Sasser
PO Box 974

Sheriff* 459-4121

Jimmy Grimes
PO Box 355

County Manager 459-9800

J. Wayne Deal fax 459-1000
Administration Building, Suite 3072

*INNER OFFICE
BEN FARNES
P.R.O.
MSC 1628*

County Attorney 937-2200

Vince Durham
PO Box 7100
Rocky Mount, NC 27804-0100

Finance Officer 459-9803

Lynne Anderson
Administration Building, Suite 3072

County Planner 459-9809

Rosemary Dorsey
Administration Building, Suite 2110

Purchasing Officer 459-9853

Wayne Moore
Administration Building, Suite 3072

Tax Administrator 459-9815

Gene Rountree
Administration Building, Suite 2058

Chairman, Education Board*

Ernie Murray 442-1977
715 Evergreen Road
Rocky Mount, NC 27803

Chairman, ABC Board 443-5420

Randolph Holoman
3521 Sheffield Drive
Rocky Mount, NC 27803

Chairman, Elections Board 443-2320

Robert Siler
3609 Woodlawn Road
Rocky Mount, NC 27804

Director, Elections Board 459-1350

Tracy Reams
PO Box 305

Director, Social Services 459-9818

Carl M. Daughtry
Administration Building, Suite 2070

Director, Health Services 459-9819

William Hill, Jr.
PO Box 849

Director, Emergency Services 459-9814

Brian Brantley
Administration Building, Suite 1102

Director, Economic Development 442-0114

John Gessaman
Carolinas Gateway Partnership
427 Falls Road
Rocky Mount, NC 27804

Director, Cooperative Extension 459-9811

Linda Aycock
Agriculture Center, Rm. 102

Director, Data Processing 459-1235

Alton Vick
Administration Building, Suite 3004

Director, Mental Health 937-8141

Patricia B. Adams
500 Nash Medical Arts Mall
Rocky Mount, NC 27804

Forest Ranger 459-7338

Charles Wood
3083 US 64A

Veterans Service Officer 985-5080

Alton Clemmons
301 S. Fairview Road
Rocky Mount, NC 27801

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Wayne Moore
Administration Building