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ISSUED  
November 30, 2010 via an e-mail  
Solid Waste Section  
Raleigh Central Office

**Chao, Ming-tai**

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**From:** Chao, Ming-tai  
**Sent:** Tuesday, November 30, 2010 3:39 PM  
**To:** 'David Garrett'  
**Cc:** 'Ronnie Petty '; Mussler, Ed  
**Subject:** A-1 Sandrock C&DLF, permit # 41-17

Dear Dave:

On November 18, 2010, I received an e-mail containing the electronic submittals, a cover letter and several attachments, which contains:

- The updated Operations Plan (Attachment 1) incorporates the conclusions and suggested changes of the operating requirements and procedures associated with the C&D and LCID Sorting and Recycling Facility which are based on the December 21 2009 Six-Month Demonstration Report in compliance with the Permit Condition 40 in the PTO dated April 17, 2009. The updated Operations Plan also reflected the suggestions made in the 2010 DWM Facility Compliance Audit Reports.
- The Geologist's Subgrade Report (Attachment 2) and As-Built Survey of Phase 1, Cell B (Attachment 3) – Drawing E1A, which are components of the CQA Certification Report for the Phase 1, Cell B.
- The Updated Facility Plan Map to correct the discrepancy of the Phase 1 footprints (or total acreages) between the text and drawing in the PTC applications. The updated Drawing E1B shows the Phase 1 footprints of 8.18 acres.

I have completed a review and have several comments on the above-referenced submittals.

1. According to the drawings in the approved PTC applications, there are five soil borings located in the Cell B – B12, B-22, B-23, B-26, and B-28. In compliance with Permit Condition No. 10 in Attachment 2 of PTC for the Phase 1 issued on June 1, 2006, the borings shall be properly abandoned. Please provide the documentations and records to demonstrate these borings are properly abandoned.
2. The final base grades of the Cell B – 785-ft amsl to 765-ft amsl as shown on Drawing E1A is changed from the original proposed ones – 790-ft amsl to 758-ft amsl as shown in “Phase 1 –Stage 2” on Drawing E1/Sheet No. 2 in the approved Facility and Operations Plan Updated dated February 2009. This variation was described in the Attachment 2 - the Geologist's Subgrade Report. Will this variation of final base grade result in the change of total gross capacity of the Phase 1 and the C&DLF as described in the Sections 1.3.2 & 8.2.2 in the updated PTC applications (Attachment 1)? Please clarify.
3. (Section 4 – Construction Quality Assurance) Please address the following concerns:
  - i. The Tables 7A, 7B, & 7C are likely typos because the QA/QC testing requirements are stated in Tables 4A, 4B, and 4C. Please conduct a global search in this Section 4 and make necessary correction.
  - ii. In Table 4A, the referenced testing method – ASTM D4138 is incorrect. The correct method is D4318.
  - iii. Please provide CQA testing results as specified in Table 4A. The test locations in Cell B need to be documented on the as-built drawings in accordance with Sections 4.4 and 4.5.
4. (Section 8.1.2) To consistent with the approved 3 (H) to 1(V) side slopes for the final cover system, the post-settlement surface slopes described in Section 8.1.2 shall range from 5% to 33.3%, not 25%.

Please respond the above-mentioned comments and submit a final copy (one hard copy and an electronic copy) of the permit modification document (including Phase 1, Cell B CQA certification report and related drawings) to my attention. You also need sign and seal the Sections 9.6 and 11 of the final permit application as well.

Additionally, A-1 Sandrock, Inc. must pay for the permit modification fee of \$1,500 dollars for reviewing the Phase 1, Cell B CQA certification, and the Solid Waste Section has sent the invoice to A-1 Sandrock, Inc. on 11/22/2010.

Upon approval the CQA report for Cell B and updated permit applications, the PTC for Cells B& C and the PTO for Cells A & B [including approval of the processing facility (lifting and removing the interim status)] may be issued pending approval from Ed.

Please call me if you have any questions of the comments and permitting processes. Thanks.

Best regards,

Ming-Tai Chao, P.E.  
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