ALTAMONT ENVIRONMENTAL, INC.
ENGINEERING & HYDROGEOLOGY
231 HAYWOOD STREET, ASHEVILLE, NC 28801
TEL.828.281.3350 FAC.828.281.3351
WWW.ALTAMONTENVIRONMENTAL.COM

February 9, 2012

Ms. Elizabeth Werner
North Carolina Department of Environment and Natural Resources
Division of Waste Management
Solid Waste Section
1646 Mail Service Center
Raleigh, NC 27699-1636

Subject: Duke Energy Carolinas, LLC
Belews Creek Steam Station
Stokes County, NC
FGD Residue Landfill, Permit No. 8505
Monitoring Well BC-25 Assessment

Dear Ms. Werner:

On behalf of Duke Energy Carolinas, LLC (Duke), Altamont Environmental Inc. submits the proposed *Groundwater Assessment Work Plan, Belews Creek Steam Station, FGD Residue Landfill, Permit No. 8505, February 9, 2012.* This proposed assessment work plan is submitted in response to your letter of November 9, 2011 to Mr. Ed Sullivan, P.E. (Duke Energy), DOC ID 15487.

Altamont Environmental Inc. appreciates the opportunity to provide this information to the North Carolina Department of Environment and Natural Resources and to assist Duke Energy with these projects. Please call (828) 281-3350 if you have any questions or require additional information.

Sincerely,

ALTAMONT ENVIRONMENTAL, INC.

William M. Miller

William M. Miller, P.E.
Project Manager

enclosure: *Groundwater Assessment Work Plan, Belews Creek Steam Station, FGD Residue Landfill, Permit No. 8505, February 9, 2012.*

cc: Mark Poindexter, SWS, mark.poindexter@ncdenr.gov
Jason Watkins, SWS, jason.watkins@ncdenr.gov
Ellen Lorscheider, SWS, ellen.lorscheider@ncdenr.gov
Hugh Jernigan, SWS, hugh.jernigan@ncdenr.gov
Ed Sullivan, P.E., Duke, Ed.Sullivan@duke-energy.com
Kimberlee Benson, P.E., Duke, Kimberlee.Benson@duke-energy.com
Melonie Martin, Duke, Melonie.Martin@duke-energy.com

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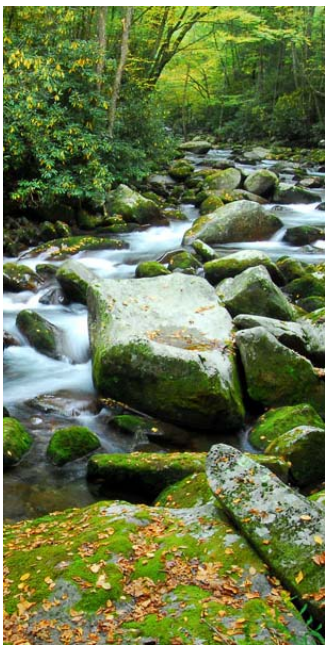
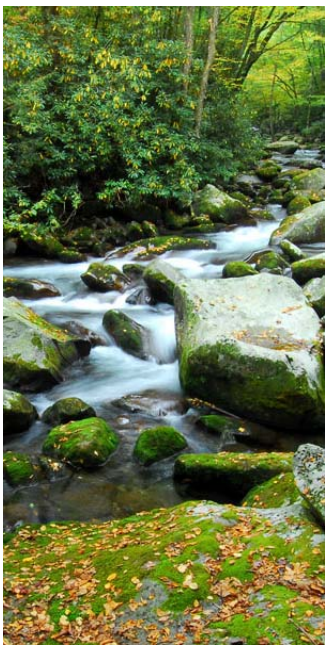




ALTAMONT ENVIRONMENTAL, INC.

ENGINEERING & HYDROGEOLOGY

Groundwater Assessment Work Plan

Belews Creek Steam Station

FGD Residue Landfill, Permit No. 8505

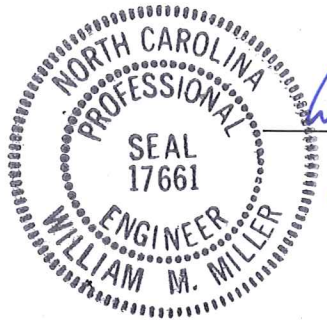
February 9, 2012

Prepared for
Duke Energy Carolinas, LLC
Belews Creek Steam Station
3195 Pine Hall Road
Belews Creek, NC 27042
Project Number 2371.13

Prepared by
Altamont Environmental, Inc.
231 Haywood Street
Asheville, NC 28801
(828) 281-3350

Professional Certification

On behalf of Altamont Environmental, Inc., a firm licensed to practice engineering (certification number C-2185) in the State of North Carolina, I do hereby certify that the information contained in this report is correct and accurate to the best of my knowledge.



William M. Miller

2/9/12

William M. Miller, P.E.

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1.0 Introduction

The flue gas desulfurization (FGD) Residue Landfill, Permit No. 8505, is located at the Belews Creek Steam Station in Stokes County. The station is owned and operated by Duke Energy Carolinas, LLC (Duke).

In a letter, dated November 9, 2011,[1] to Mr. Ed Sullivan, P.E. of Duke Energy Carolinas, LLC (Duke), the North Carolina Department of Environment and Natural Resources (DENR) Division of Waste Management (DWM) stated that exceedances of groundwater standards, established in Title 15A North Carolina Administrative Code (NCAC) Subchapter 2L .0202 Groundwater Quality Standards (2L standards), were reported in groundwater samples collected from groundwater monitoring well BC-25 during the May 16, 2011 monitoring event.[2] The letter is included as Appendix A.

The DENR letter stated that iron was reported at concentrations greater than the 2L standard in the groundwater sample collected from BC-25 during this event. Monitoring well BC-25 is located outside the compliance boundary. DENR also stated that industrial landfills are required to comply with the 2L standards at the compliance boundary in accordance with 15A NCAC 13B .0503 (2)(d)(iv).

In addition, the DENR letter stated that concentrations of iron and manganese were reported at concentrations above their respective 2L standards in groundwater monitoring wells BC-20, BC-21, BC-23A, BC-26, BC-27, BC-29 and BC-31. These wells are located at or beyond the review boundary.

DENR stated that based on these exceedances, Duke shall submit a groundwater assessment work plan to the DWM Solid Waste Section. This document, prepared by Altamont Environmental Inc. (Altamont) on behalf of Duke, presents the proposed groundwater assessment work plan.

[1] North Carolina Department of Environment and Natural Resources. Division of Waste Management. November 9, 2011, Monitoring Well BC-25 Assessment. Duke Energy – Belews Creek FGD Landfill. DOC ID 15487.

[2] The DENR letter references the monitoring event as occurring on May 6, 2011. The actual date for the sampling event was May 16, 2011.

2.0 Background

2.1 Site Description

The flue gas desulfurization (FGD) residue landfill is located at the Belews Creek Steam Station, in Stokes County, North Carolina. Belews Creek Steam Station is a two-unit coal-fired generating facility located on Belews Lake in Stokes County, North Carolina. It is Duke's largest coal-burning power plant in the Carolinas and consistently ranks among the most efficient coal facilities in the United States. The landfill is permitted under the DENR Solid Waste Permit No. 8505. The FGD residue landfill is permitted to receive FGD residue (gypsum) from Belews Creek Steam Station operations.

The FGD residue landfill is located south of the Belews Creek power plant, on land between two arms of the Belews Lake. The West Belews Creek arm is located west of the landfill site and the East Belews Creek arm is located east of the site. Craig Road is located to the west of the landfill. The FGD residue landfill and nearby surrounding area are depicted on Figure 1.

The landfill consists of four cells contained in an area of approximately 24 acres. The adjacent stormwater basin occupies an area of approximately 2.4 acres. This stormwater basin is used to manage leachate and stormwater collected from the landfill. The landfill has an engineered liner system consisting of a leachate collection system, underlain by a high-density polyethylene (HDPE) geomembrane liner, underlain by a geo-synthetic clay liner.

2.2 Site Geology and Hydrogeology

The Belews Creek Steam Station is located in the Piedmont Physiographic Province of North Carolina, within the Milton Belt. The rocks of the Milton belt were formed during the Precambrian era and metamorphosed during the Paleozoic era. The bedrock in the vicinity of the landfill generally consists of schist and gneiss. The soils that overlie the bedrock in the area have generally formed from the in-place weathering of the parent bedrock. These soils are termed residuum (residual soils) and saprolite. The residuum is typically finer-grained and has a higher clay content than the underlying saprolite. The highly weathered saprolite generally retains the overall structure and appearance of the underlying bedrock. The saprolite grades into partially weathered rock and finally into bedrock.

Groundwater generally occurs within the residuum and saprolite under unconfined conditions. Often, the heterogeneous nature of the soil results in variable porosities and permeabilities both laterally and vertically. However, low permeability units that would result in confining conditions between the overlying soils and bedrock are generally absent. In the underlying bedrock, groundwater occurs predominately in fractures and joints and flow may occur under either unconfined or confined conditions.

2.3 Description of Monitoring System

The groundwater monitoring system at the landfill consists of the following sample locations as listed below.

Monitoring Wells:	BC-7	BC-26
	BC-20	BC-27
	BC-21	BC-28
	BC-22	BC-29
	BC-23A	BC-30
	BC-25	BC-31
Surface Water Sample Location:	SW-1	

The groundwater monitoring, surface water monitoring, and leachate sample locations are shown on Figure 2. Monitoring wells BC-23A and BC-28 are considered to represent background groundwater quality, according to the Water Quality Monitoring Plan.[3]

Monitoring well BC-7 is used for water level measurements only. All other monitoring wells are used to monitor groundwater quality in the saprolite layer and to measure groundwater levels.

SW-1 is a groundwater seep located to the east of well BC-28. When water is present, it emanates from the ground just above the sampling location. Therefore, analytical results from SW-1 are compared to 2L groundwater quality standards. This surface water feature drains to Belews Lake.

The landfill leachate is also sampled at a location within the stormwater basin.

2.4 Site Groundwater Flow

Generalized groundwater surface contours for the site are shown on Figure 3. These contours were developed using groundwater elevations measured at the wells on the date of sampling.

Based on the groundwater elevations measured at the wells on the date of sampling, groundwater flow in the area of the landfill is generally from areas of higher topography, located to the east of the landfill, toward Belews Lake, located to the west and to the north of the landfill.

[3] *Water Quality Monitoring Plan FGD Scrubber Residue Landfill Belews Creek Steam Station,* December 07, 2007.

3.0 Groundwater Quality

In accordance with the Water Quality Monitoring Plan, groundwater monitoring is performed semiannually in May and November. Sampling results are submitted to DENR within 60 days of sampling.

As noted in the DENR letter dated November 9, 2011, exceedances of the 2L standards were reported for groundwater monitoring wells during the May 16, 2011 monitoring event. After review of the DENR November 9, 2011 letter, a telephone conversation was conducted between representatives from DENR, Duke, and Altamont concerning these exceedances. Participating in that conversation were Ms. Elizabeth Werner, Hydrogeologist (DENR), Mr. Ed Sullivan, P.E. (Duke), and Mr. Bill Miller, P.E. (Altamont).

During the conversation, Duke proposed that exceedances reported in groundwater sampling events, conducted more recently than the event noted in the DENR letter of November 9, 2011, would be addressed in the proposed assessment work plan. DENR agreed with this proposal.

Table 1 presents the 2L exceedances reported for groundwater monitoring well BC-25 located at or beyond the compliance boundary.

Table 2 presents the 2L exceedances reported for groundwater monitoring wells (BC-20, BC-21, BC-23A, BC-26, BC-27, BC-29, and BC-31) located at or beyond the review boundary.

Table 3 presents the 2L exceedances reported for surface water sample location SW-1 located at or beyond the compliance boundary.

4.0 Proposed Groundwater Assessment Work Plan

4.1 Proposed Groundwater Assessment Work Plan for Well BC-25

The proposed groundwater assessment plan for evaluating the 2L standard exceedances at well BC-25 is provided in Table 4. In general, the proposed plan for evaluating the exceedances at BC-25 is to determine if surface contamination from adjacent gypsum operations is the source of the exceedances at this well. If, after the evaluation outlined in Table 4 is completed, it is determined that the installation of a groundwater monitoring well at the review boundary should be performed, DENR will be consulted before any work is performed.

4.2 Proposed Groundwater Assessment Work Plan for Remaining Wells and Surface Water Sampling Location

In general, the proposed groundwater assessment plan for these sample locations is to evaluate if the 2L exceedances can be attributed to the site background water quality and/or if the exceedances can be attributed to sediment or particulate matter, which is preserved in the samples.

The proposed groundwater assessment plan for evaluating the 2L exceedances at wells BC-20, BC-21, BC-23A, BC-26, BC-27, BC-29, and BC-31 is provided in Table 5. The proposed groundwater assessment plan for evaluating the 2L exceedances at surface water sample location SW-1 is provided in Table 6.

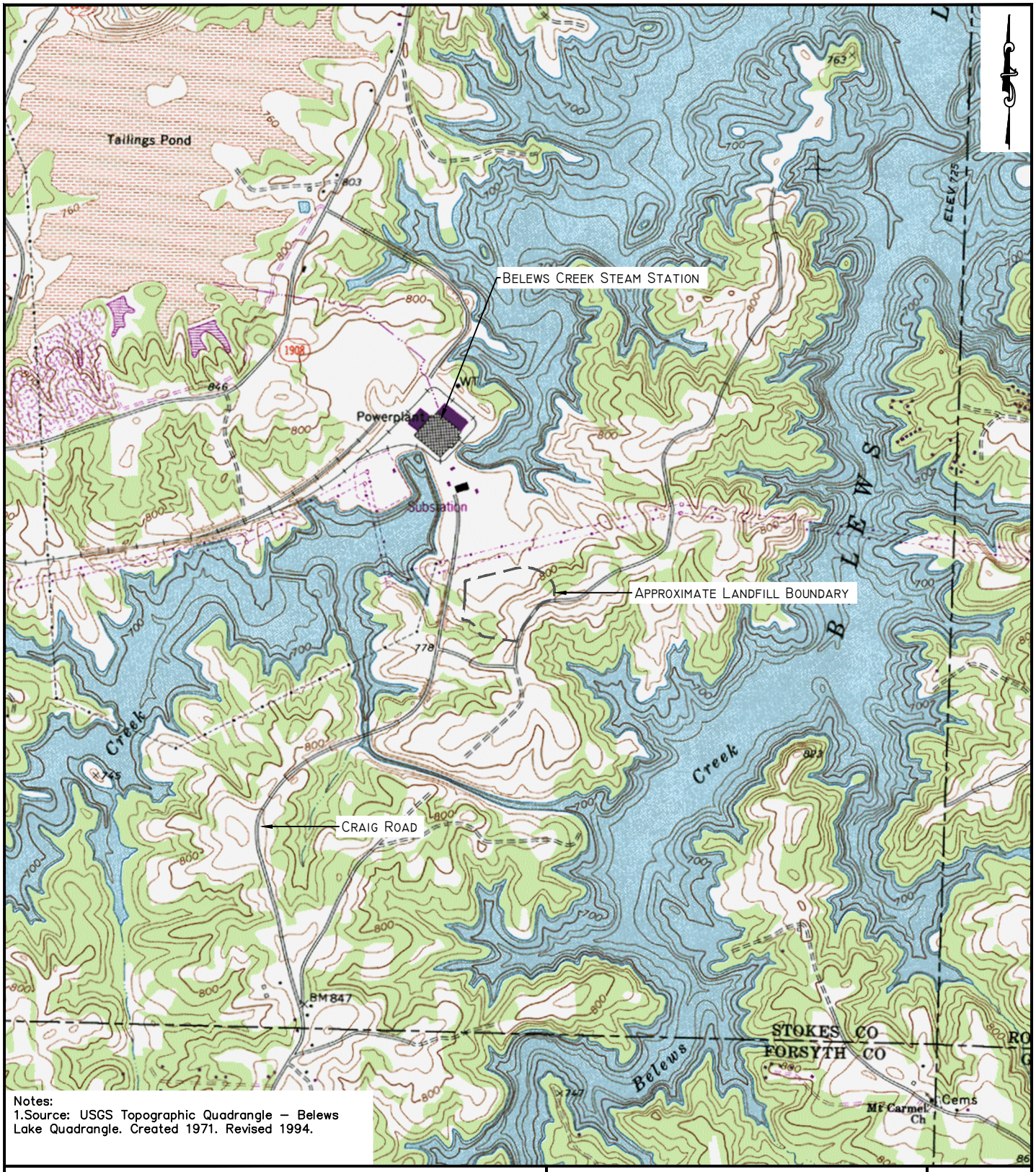
5.0 Assessment Report and Project Schedule

The groundwater assessment report will present results of the work proposed in Section 4.0 and will include interpretations of the results and recommendations for additional work, if deemed necessary. The next groundwater sampling event is scheduled to occur in May 2012. The groundwater assessment report will include analytical results from the May 2012 groundwater sampling event.

The report will be prepared by a North Carolina Professional Engineer.

The project schedule is to submit the groundwater assessment report 120 days after the next scheduled groundwater sampling event unless redevelopment of one or more of the monitoring wells is required. The groundwater assessment report will be submitted 150 days after the next scheduled groundwater sampling event if redevelopment of one or more of the monitoring wells is required. The next groundwater sampling event is scheduled in May 2012. The proposed report submittal date is contingent upon DENR approval of the proposed groundwater assessment work plan by March 1, 2012.

FIGURES



Notes:
1.Source: USGS Topographic Quadrangle – Belews Lake Quadrangle. Created 1971. Revised 1994.

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Site Location Map

Belews Creek Steam Station
FGD Residue Landfill
Permit No. 8505

FIGURE
1

DRAWN BY: Andrew Moore
PROJECT MANAGER: William M. Miller
CLIENT: Duke Energy Carolinas, LLC
DATE: 2/9/12

SCALE (FEET)
1000 0 1000 2000

File Path: P:\Duke - LF Groundwater Reports -2369\2369.03 BCS FGD Rd LF\Figures\Site Location Map.dwg

FACILITY BOUNDARY

COMPLIANCE BOUNDARY

REVIEW BOUNDARY

SEDIMENT BASIN SB-6

SEDIMENT BASIN SB-7

BC-20

BC-21

BC-22

BC-25

BC-26

BC-27

BC-29

BC-7

BC-30

BC-31

BC-28

BC-23A

CELL 1

CELL 2

CELL 3

CELL 4

LIMIT OF WASTE

LIMIT OF WASTE

LIMIT OF WASTE

STORMWATER BASIN

LEACHATE SAMPLE LOCATION

SURFACE WATER SAMPLE LOCATION (SW-1)

BELEWS LAKE

CRAIG ROAD

EXISTING GRAVEL ACCESS ROAD

Exist. Gravel Access Rd.

EXISTING GRAVEL ACCESS ROAD

Access Road

ST-7

SB-5

Base Map Provided by Duke Energy Carolinas, LLC.

- BC-22 — Groundwater Monitoring Well
- Surface Water Sample Location
- Leachate Sample Location
- Landfill Review Boundary
- Landfill Compliance Boundary
- Approximate Limit of Waste
- Facility Boundary

ALTAMONT ENVIRONMENTAL, INC.

ENGINEERING & HYDROGEOLOGY

231 Haywood Street, Asheville, NC 28801

TEL.828.281.3350 FAC.828.281.3351

www.altamontenvironmental.com

DRAWN BY: Andrew Moore

PROJECT MANAGER: William M. Miller

CLIENT: Duke Energy Carolinas, LLC

DATE: 2/9/12

SCALE (FEET)

100 0 100 200

Sample Locations

Belews Creek Steam Station

FGD Residue Landfill

Permit No. 8505

FIGURE

2

File Path: P:\Duke - LF Groundwater Reports -2369\2369.03 BCS FGD Rd LF\2011\November Sampling\Figures\BCS FGD LF.dwg

FACILITY BOUNDARY

COMPLIANCE BOUNDARY

REVIEW BOUNDARY

BC-25 (730.73')

BC-20 (739.51')

BC-21 (743.37')

BC-22 (762.88')

BC-26 (730.36')

BC-27 (729.20')

BC-29 (736.47')

BC-7 (739.24')

BC-30 (746.40')

BC-31 (754.72')

BC-28 (766.21')

BC-23A (787.03')

SEDIMENT BASIN SB-6

SEDIMENT BASIN SB-7

CELL 1

CELL 2

CELL 3

CELL 4

LIMIT OF WASTE

LIMIT OF WASTE

LIMIT OF WASTE

LEACHATE SAMPLE LOCATION

STORMWATER BASIN

SURFACE WATER SAMPLE LOCATION (SW-1)

BELEWS LAKE

CRAIG ROAD

EXISTING GRAVEL ACCESS ROAD

EXISTING GRAVEL ACCESS ROAD

Base Map Provided by Duke Energy Carolinas, LLC.

- BC-22 (763.25') — Groundwater Monitoring Well (Groundwater Elevation (feet))
- Surface Water Sample Location
- Leachate Sample Location
- Landfill Review Boundary
- Landfill Compliance Boundary
- Approximate Limit of Waste
- Facility Boundary
- Generalized Groundwater Surface Contour

ALTAMONT ENVIRONMENTAL, INC.

ENGINEERING & HYDROGEOLOGY

231 Haywood Street, Asheville, NC 28801

TEL.828.281.3350 FAC.828.281.3351

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DRAWN BY: Andrew Moore
PROJECT MANAGER: William M. Miller
CLIENT: Duke Energy Carolinas, LLC
DATE: 2/9/12

SCALE (FEET)

100 0 100 200

Generalized Groundwater Surface Contours

November 7, 2011

Belews Creek Steam Station
FGD Residue Landfill
Permit No. 8505

FIGURE 3

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TABLES

Table 1
2L Standard Groundwater Quality Exceedances for Wells at or Beyond the Compliance Boundary
Belews Creek FGD Landfill, Stokes County, North Carolina

Well ID	Parameter	Sample Date for Exceedance	Date of Report	Analytical Result (µg/L)	15A NCAC 2L Standard (µg/L)
BC-25	Sulfate	November 7, 2011	February 3, 2012	353,000	250,000
	Total Dissolved Solids	November 7, 2011	February 3, 2012	623,000	500,000
	Iron	November 7, 2011	February 3, 2012	1,423	300

Notes:

1. 15A NCAC 2L Standard is from "North Carolina Administrative Code, Title 15A: Department of Environment and Natural Resources, Subchapter 2L - Groundwater Classifications and Standards," DENR (last amended on January 1, 2010).
2. Analytical results provided by Duke Energy Carolinas, LLC.
3. Since the compliance boundary is located beyond the review boundary, these wells are located beyond the review boundary.

Table 2
2L Standard Groundwater Quality Exceedances for Wells at or Beyond the Review Boundary
Belews Creek FGD Landfill, Stokes County, North Carolina

Well ID	Parameter	Sample Date for Exceedance	Date of Report	Analytical Result (µg/L)	15A NCAC 2L Standard (µg/L)
BC-20	Iron	November 7, 2011	February 3, 2012	1,632	300
BC-21	Iron	November 7, 2011	February 3, 2012	331	300
BC-23A	Iron	November 7, 2011	February 3, 2012	568	300
BC-26	Iron	November 7, 2011	February 3, 2012	532	300
BC-27	Iron	November 7, 2011	February 3, 2012	3,990	300
	Manganese	November 7, 2011	February 3, 2012	207.6	50
BC-29	Iron	November 7, 2011	February 3, 2012	401	300
BC-31	Iron	November 7, 2011	February 3, 2012	860	300

Notes:

1. 15A NCAC 2L Standard is from "North Carolina Administrative Code, Title 15A: Department of Environment and Natural Resources, Subchapter 2L - Groundwater Classifications and Standards," DENR (last amended on January 1, 2010).
2. Analytical results provided by Duke Energy Carolinas, LLC.
3. Since the compliance boundary is located beyond the review boundary, these wells are located inside of the compliance boundary.

Table 3
2L Standard Groundwater Quality Exceedances for Surface Water Sample Locations at or Beyond the Compliance Boundary
Belews Creek FGD Landfill, Stokes County, North Carolina

Sample Location	Parameter	Sample Date for Exceedance	Date of Report	Analytical Result (µg/L)	15A NCAC 2L Standard (µg/L)
SW-1	Iron	November 7, 2011	February 3, 2012	2,231	300
	Manganese	November 7, 2011	February 3, 2012	741	50

Notes:

1. 15A NCAC 2L Standard is from "North Carolina Administrative Code, Title 15A: Department of Environment and Natural Resources, Subchapter 2L - Groundwater Classifications and Standards," DENR (last amended on January 1, 2010).
2. Analytical results provided by Duke Energy Carolinas, LLC.
3. The surface water sample location SW-1 is a groundwater seep and is considered to be groundwater. Therefore analytical results from this location are compared to 2L standards.

Table 4
Method of Assessment for Monitoring Wells
at or Beyond the Compliance Boundary
Belews Creek FGD Landfill, Stokes County, North Carolina

Well ID	Parameter	Method of Assessment
BC-25	Sulfate, Total Dissolved Solids	a. Investigate well completion to determine if surface contamination is source of exceedences: 1. Clean well cap and protective casing, redevelop well, and sample. 2. If previous step does not resolve issue, propose installation of a monitoring well at the review boundary west of BC-20, near Craig Road. DENR will be consulted prior to the installation of the monitoring well.
	Iron	a. Evaluate if the sources of exceedances are naturally occurring and are from sediment or other particulate matter by performing one or more of the following: 1. Evaluate historic concentrations compared to date of initial waste placement. 2. Evaluate exceedances against turbidity values. 3. Collect and analyze filtered and non-filtered samples. 4. If previous step does not resolve issue, propose installation of monitoring well at the review boundary west of BC-20, near Craig Road. DENR will be consulted prior to the installation of the monitoring well.

Table 5
Method of Assessment for Wells
at or Beyond the Review Boundary
Belews Creek FGD Landfill, Stokes County, North Carolina

Well ID	Parameter	Method of Assessment
BC-20	Iron	a. Evaluate if the sources of exceedances are naturally occurring and are from sediment or other particulate matter by performing one or more of the following: 1. Evaluate historic concentrations compared to date of initial waste placement. 2. Evaluate exceedances against background well results. 3. Evaluate exceedances against turbidity values. 4. Evaluate sampling flow rates. 5. Collect and analyze filtered and non-filtered samples. 6. Redevelop well and clean pump if steps above do not resolve issue.
BC-21	Iron	
BC-23A	Iron	
BC-26	Iron	
BC-27	Iron	
	Manganese	
BC-29	Iron	
BC-31	Iron	

Table 6
Method of Assessment for Surface Water Sample Locations at or Beyond the Compliance Boundary
Belews Creek FGD Landfill, Stokes County, North Carolina

Sample Location	Parameter	Method of Assessment
SW-1	Iron, Manganese	a. Evaluate if the sources of exceedances are naturally occurring and are from sediment or other particulate matter by performing one or more of the following: 1. Evaluate historic concentrations compared to date of initial waste placement. 2. Evaluate exceedances against background well results. 3. Evaluate exceedances against turbidity values. 4. Evaluate boron and sulfate analytical results. These constituents are more soluble than iron and manganese. However, these constituents are being measured at low levels at this location. Therefore, it is not expected that the iron and manganese measured is from leachate leaking through the landfill liner system.

APPENDIX A

LETTER FROM NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES. NOVEMBER 9, 2011. TO ED SULLIVAN, P.E., DUKE ENERGY. DOC ID 15487.

North Carolina Department of Environment and Natural Resources
Division of Waste Management

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

November 9, 2011

Mr. Ed Sullivan, P.E.
Mail Code EC13K
PO Box 1006
Charlotte, NC 28201

RE: Monitoring Well BC-25 Assessment
Duke Energy - Belews Creek FGD Landfill
Permit #85-05
Stokes County
DOC ID 15487

Dear Mr. Sullivan:

A review of groundwater analytical data from the FGD Landfill indicates exceedances of groundwater standards established in 15A NCAC 2L .0202 (2L Standards) during the May 6, 2011 monitoring event. Iron has been reported at concentrations greater than the 2L Standards in groundwater samples collected from BC-25. Monitor well BC-25 appears to be located outside the compliance boundary. Industrial landfills are required to comply with the 2L standards at the compliance boundary in accordance with 15A NCAC 13B .503 (2)(d)(iv).

Duke Energy shall acquire the services of a North Carolina licensed professional geologist and submit a groundwater assessment work plan to the Solid Waste Section (Section) outlining how the reported metals contamination in BC-25 will be delineated. The Section will review the submitted work plan, approve, or request additional information or amendments before implementation. Please submit this work plan within 90 days of receiving this letter. The work plan may include, but not limited to an alternate source demonstration for the metals contamination. In addition, monitoring wells BC-20, BC-21, BC-23A, BC-26, BC-27, BC-29 and BC-31 have iron and manganese concentrations above their respective 2L Standards and appear to be located at or beyond the review boundary, which triggers the need for assessment.

The Section solicits your cooperation and would like to remind you that it is your responsibility to comply with the requirements of the rules and statues since the rules are self-implementing. Please contact me at (919) 707-8253 or via email Elizabeth.werner@ncdenr.gov if you have any questions or concerns regarding this letter. Thank you in advance for your anticipated cooperation in this matter.

Sincerely,

Elizabeth S Werner
Hydrogeologist

cc: William M. Miller, PE, Altamont Environmental Inc.
Mark Poindexter, SWS
Jason Watkins, SWS
Ellen Lorscheider, SWS
Hugh Jernigan, SWS
Central File