

Davidson C.O. 29-08

29082004

2004

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North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor  
William G. Ross Jr., Secretary

May 5, 2004

Mr. Todd Warfford, President  
Todco, Inc.  
1123 Roy Lopp Road  
Lexington, NC 27292

RE: Todco, Inc Wood Recycling Facility  
Permit Number 29-08 – Davidson County

Dear Mr. Warfford:

Enclosed is the Todco, Inc. Wood Recycling Facility permit to operate a Treatment and Processing and Type 1 Compost Facility at 1123 Roy Lopp Road, Lexington, North Carolina in Davidson County, North Carolina. Please review the permit conditions.

Mr. Hugh Jernigan, Waste Management Specialist, Winston-Salem Regional Office is your contact person and can be reached at 336-771-4600. If I can be of further assistance, please call me at 919-733-0692 ext. 253.

Sincerely,

Ted Lyon, Supervisor  
Composting & Land Application Branch

Cc: Hugh Jernigan, WSRO  
SW File Room

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STATE OF NORTH CAROLINA  
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES  
DIVISION OF WASTE MANAGEMENT  
1646 Mail Service Center RALEIGH, N.C. 27699-1646

**Todco, Inc Wood Recycling Facility**

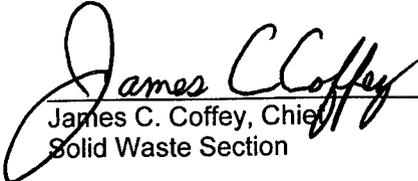
is hereby issued a permit to operate a

**Solid Waste Treatment and Processing  
and Type I Compost Facility**

At 1123 Roy Loop Road  
Davidson County, NC

**Permit Number 29-08**

In accordance with Article 9, Chapter 130A, of the General Statutes of North Carolina and all rules promulgated thereunder and subject to the conditions set forth in this permit.

  
James C. Coffey, Chief  
Solid Waste Section

04/29/04  
Date

## Permit Conditions

1. Operation and maintenance of this facility shall be in accordance with the Solid Waste Management Rules (15A NCAC 13B, Section .0202 and Section .1400), the permit application and the Operation Plan submitted with the permit application. Failure to comply may result in compliance actions or permit revocation.
2. Any leachate generated at the facility shall be managed in such a manner that there will be no degradation of ground or surface waters.
3. This facility shall be operated in such a manner that soil erosion and runoff from the site shall be controlled. Erosion and runoff control structures shall be maintained in place and in proper working order.
4. The 50-foot property line buffer shall be maintained free of waste and final product.
5. Only materials specifically listed in the permit application may be managed at this facility without adequate testing and prior approval of the Division of Waste Management.
6. Non conforming waste received at the facility or removed from final product during screening shall be maintained in an appropriate on-site container or removed from the facility within 24 hours and properly disposed. Contaminated soils may not be managed at this facility.
7. Groundwater monitoring wells may be required if there is indication of the potential for groundwater contamination.
8. This facility shall be operated and maintained with sufficient dust control measures to minimize airborne emissions and to prevent dust from becoming a nuisance or safety hazard.
9. The amount of waste received and the amount and type of products sold or otherwise distributed shall be reported to the Division of Waste Management by August 1<sup>st</sup> of each year for the previous July 1 to June 30.
10. This permit shall expire on December 30, 2008. A change in ownership, increase in facility capacity, process changes or receiving additional waste types shall require a permit modification.

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**Treatment and Processing  
and Type 1 Composting  
Permit Application**

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***Todco, Inc.  
Wood Recycling Facility***

***1123 Roy Lopp Road  
Davidson County, NC***

***Revised March 2004***

**APPROVED**  
DIVISION OF WASTE MANAGEMENT  
SOLID WASTE SECTION  
DATE 4/29/04 BY JK



**EcoLogic Associates, P.C.  
218-4 Swing Road  
Greensboro, NC 27409  
(336) 855- 8108**

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## **INTRODUCTION**

The subject site is the Todco, Inc. Wood Recycling Facility (Todco) at 1123 Roy Lopp Road in Davidson County, North Carolina (Figures 1 through 3). The site is currently developed with a wood recycling and processing facility. The subject facility began operations on October 26, 1992. We understand that the North Carolina Department of Environment and Natural Resources (NCDENR), Division of Waste Management (DWM), requires a Land Clearing Debris (LCD) Treatment and Processing Permit for the facility. This report includes a summary of information obtained regarding the site and facility operations and includes the information necessary to satisfy permitting guidelines established by NCDENR/DWM. Some of the information assembled for this application was obtained by Blue Ridge Geological Services, Inc. working directly for the owner. EcoLogic has relied on that information as being current and accurate in preparing this application

### **ITEM 1 – AERIAL PHOTOGRAPH**

Aerial photographs showing the subject site and surrounding properties are presented as Figures 3 and 4.

### **ITEM 2 – VICINITY MAP**

A vicinity map showing the location of the subject facility is presented as Figure 1. Adjacent land uses are primarily agricultural, with the exception of the Davidson County Landfill located due north across Hamby Creek (Figures 1 and 3).

### **ITEM 3 – SITE PLAN**

A site plan for the subject facility is presented as Figure 2. The site plan illustrates the property lines, topography, sedimentation and erosion control structures, existing buildings, structures, wells, and utilities, surface water features, access control features, existing roads and traffic flow pattern, adjacent land use, and stockpiles. Stockpile types and locations vary with material being processed and sold seasonally. Figure 2 also illustrates the relationship of the facility operations boundary to the mapped 100-year floodplain in the vicinity.

#### ITEM 4A – SEDIMENTATION AND EROSION CONTROL PLAN

The facility is already constructed, and land surfaces are paved, vegetated, or used for waste storage and processing; therefore, a sedimentation and erosion control plan is not applicable. Adequate sedimentation and erosion control measures are present at the site to prevent operational sediment from leaving the site and to prevent excessive on-site erosion. Blue Ridge Geological Services, Inc., working directly for the owner, provides ongoing consulting to manage on-site stormwater drainage and erosion and sediment controls. There have been no recent inspections by the Division of Land Resources, Land Quality Section reported by the owner.

#### ITEM 4B, C – SITING CRITERIA

1. **100-year Floodplain** – As shown on Figure 2, the operations at the site are not located in or near the 100-year floodplain. Hamby Creek forms the northern boundary of the property. The 100-year floodplain is restricted to the general vicinity of the creek. The topography in the northern margin of the site slopes steeply downward to Hamby Creek. The 60-foot vertical slope provides a natural barrier and buffer between site operations and the floodplain.
2. **Endangered or Threatened Species** – The subject facility does not cause or contribute to the taking of any endangered or threatened species of plants, fish, or wildlife. Refer to the natural resources inventory report included in the Appendix.
3. **Critical Habitat** – The operations at the subject facility do not result in the destruction or adverse modification of the critical habitat of endangered or threatened species as identified in 50 CFR Part 17. Refer to the natural resources inventory report included in the Appendix.
4. **Separation from Water Table** – The operations at the subject facility are not located in an area where the permanent, seasonal, or perched water table is located within 12 inches of the soil surface. According to the *Soil Survey of Davidson County* dated July 1994, the majority of the site and the area of the facility operations are underlain by soil classified as Udorthents (Ud). This soil unit is found in areas where the natural soils have been altered by cutting, filing, and shaping of the land. Soils along the northern and western margins of the site are classified as the Poindexter and Zion

sandy loam (PnF). According to the published information, the depth to the seasonal high water table in this soil type is typically greater than six feet.

In April 2002, Blue Ridge Geological Services personnel advanced eight borings (P-1 through P-8) at various locations around the site (see Figure 2). The borings were drilled using a stainless steel hand auger through hard fill material and/or residuum consisting of silt and partially weathered rock to depths of between two (2) and four (4) feet below ground surface (bgs). One-inch diameter PVC pipe with a one- to two-foot, hand-slotted section was inserted into each borehole to construct a piezometer for subsequent groundwater measurement. The annular space around the PVC pipe was filled with washed and graded medium sand to approximately one to two feet above the top of the slotted section. Bentonite pellets were placed on top of the sand to the ground surface to inhibit surface water from entering the boreholes.

Field personnel measured the depth to water in each piezometer using an electronic water level indicator. A summary of the data obtained to date is presented in Table 1. Field personnel will continue to measure the depth to water in the piezometers periodically to monitor seasonal water table fluctuations at the site.

As shown in Table 1, groundwater has only been detected in three (3) of the piezometers to date, and two of those occurrences were near the end of one of the wettest years on record (2003). Those measurements indicate that groundwater occurs no less than 1.9 feet below ground surface at the site. It is possible for perched (artificially shallow) groundwater to occur beneath sites due to factors such as vegetation, landscape, soil type, and the presence of confining layers (tight and/or clay soils or rock). It is suspected that the observed occurrences of groundwater are indicative of perched groundwater or surface infiltration rather than a persistent water table.

In the Piedmont, groundwater typically recharges (infiltrates) in upland areas and discharges in low-lying surface water features such as streams and lakes or at the base of slopes. As shown in Figures 1, 2 and 5, the operational area is located on a topographic high, or ridge, with ground surface elevations of approximately 720 to 750 feet above mean sea level. Hamby Creek to the north has surface water at an approximate elevation of 650 feet above mean sea level. An unnamed drainage feature is located south of the site. Water is present in this drainage feature during several months of

the year up to approximately the 700-foot contour. Therefore, the depth to non-transient groundwater is likely to be 50 to 100 feet below the ground surface in the operational area.

5. **Point or Non-Point Source Pollution** – The subject facility is sited in such a manner that it should not result in point or non-point source pollution of waters of the State. It lies atop a ridge, and stormwater management is such that any spills or releases of contaminants can be mitigated before reaching adjacent surface waters. Stormwater management practices include perimeter berms, settling basins and other physical barriers to direct releases into surface water.
6. **Buffers** – The facility meets the minimum buffer requirements of: a) 50 feet from the waste boundary to all surface waters of the State and all property lines, b) 100 feet from the treatment and processing areas to residential dwellings and commercial or public buildings, and c) 100 feet from water supply wells. We understand that criterion b) is reduced from 200 to 100 feet for residential dwellings owned by the facility owner/operator, which is the case at this site. A forested buffer exists around much of the site's perimeter (see Figure 2).

Three water supply wells are present at the subject site. Two wells are located at the residence west of the garage, and one water supply well is located at the southeast corner of the garage (see Figure 2). The two wells at the house are not in use (one has been abandoned). None of these three wells are used for drinking water. None of the wells are located within 100 feet of the treatment and processing area.

7. **Zoning** – The majority of the facility is located on Davidson County Tax Map 3, Lot 18, which is zoned Limited Industrial District (LI). A portion of the facility (entrance road and scale house) is located on Davidson County Tax Map 2, Lot 5, which is also zoned Limited Industrial District (LI). The operations at the facility are within the permitted uses of this zoning classification. A letter of conformance from the Davidson County Planning Department is included in the Appendix.

## **ITEM 5 – LEGAL DESCRIPTION**

The subject property is primarily located on Lot 18 of Davidson County Tax Map 3. A portion of the facility (entrance road and scale house) is located on Lot 5 of Davidson County Tax Map 2. The property boundaries are shown on Figure 7. Copies of the deeds for these two lots are presented in the Appendix.

## **ITEM 6 – ZONING**

Refer to sub-item 7 under Item 4B, C above.

## **ITEM 7 – PROPERTY OWNERSHIP**

The subject property (both lots) is owned by individuals, Mr. Todd Warfford and wife (Cherie Warfford), who are the owners and operators of the facility.

## **ITEM 8 – OPERATIONS PLAN**

### **A. Facility Overview**

Todco and Best Disposal, Inc occupy the subject property. Todco has operated at the site since October 1992. Best Disposal, Inc. has operated at the site since 1995. These companies share office space and work together in many of the operations at the facility. Demand for Todco's products has grown steadily since opening, allowing the facility to expand and to produce only those products for which reliable local markets exist. The facility is open Monday through Saturday from 7:30 am to 4:30 p.m. During the winter, the facility is open Monday through Friday from 7:30 am to 4:30 p.m. and Saturday from 7:30 am to 12:30 p.m. A sign is posted at the facility entrance showing the contact name and phone number in case of emergency. A gate along Roy Lopp Road restricts access to the property.

Best Disposal, Inc. operates trucks, which transport wood waste to the site. In addition, private and commercial vehicles deliver wood waste to the site. The vehicles pass through a scale and weigh house where the vehicle weight is checked before and after dumping waste at the site. A fee is

charged to each vehicle depositing waste at the site. A receipt is provided to the vehicle driver that shows the weight of the waste deposited and the fee charged. The general traffic flow pattern at the site is illustrated on Figure 2. Access roads are of all-weather construction (gravel) and are properly maintained. The roads are resurfaced once per year.

#### B. Materials Received

The material received at the facility consists of approximately 60 percent wood waste and 40 percent yard waste. Wood waste includes pallets, furniture waste, chipboard, dimension lumber, etc. Approximately 5 percent or less of the wood waste received is treated or painted lumber. Approximately 10 percent of the wood waste received is chipboard. Yard waste includes tree trimmings, brush, leaves, stumps, etc. The amount of material received daily is variable. Typically, Todco receives a minimum of 30 tons per day and a maximum of 120 tons per day. An annual average is around 80 to 100 tons per day.

#### C. Material Handling and Processing

Wastes received at the facility are temporarily stored in either the yard waste or wood waste areas located on a concrete pad in the eastern portion of the facility (Figure 2). The pad is approximately 200 feet wide by 240 feet long, but irregularly shaped. TodCo recycles all of the wood and yard waste. The process time for waste recycling varies from less than one day to a few months. On average, Todco processes most wastes received within one week. Todco typically processes about 60 tons of waste per day. In addition, Todco purchases pine bark and hardwood mulch from other facilities and processes the material for resale.

Processing includes transferring the materials to the grinder using one of several loaders, reducing size and volume in the grinder, and then transferring the shredded material to specific storage areas for various end products. Some yard waste is transferred to a hopper using a conveyor belt and colorized for mulch. The colorized mulch is stored on the concrete pad in a storage bin. Processed yard waste is kept separate from wood waste. Most of the processed wood waste is sold as boiler fuel. All engineered wood products (glued) and wood that has been treated, painted or varnished is ground and sold for boiler fuel.

Some of the processed wastes are temporarily stored in piles or windrows. The windrows are typically 10 to 15 feet high and vary in width and length. Gravel or dirt access roads are maintained between the windrows. The windrows are periodically moved to different locations on the site prior to sale. This is done to segregate the materials by type and age and to keep pile temperatures below levels conducive to composting or spontaneous combustion.

Non-recyclable materials that are received at the facility, such as creosote timbers, are separated and placed in a roll-off container located on the concrete pad near the grinding area. Best Disposal transports the roll-off to the Davidson County Landfill, located just north of the subject facility, about twice per month and/or whenever the roll-off is full. Non-recyclable materials include trash bags, domestic trash, and metals (hinges, nails, etc.) that are removed from the waste during the grinding process. In addition, the facility occasionally receives large diameter logs. The logs are ground along with other large wood debris in a tub grinder before final processing.

#### D. Composting

The purpose of this section is to establish the standard operating procedures for managing compostable materials and producing compost at the facility. These procedures may be refined or modified as experience is gained with the facility and the process.

##### a. Acceptable Materials

The composting portion of the facility will operate as a Type 1 wood and yard waste composting facility. Acceptable materials include pine fines and mulch residuals from processing land-clearing waste, untreated and unpainted wood waste, uncontaminated pallets, and yard waste.

##### b. Windrow Composting

The windrows are constructed in the designated composting area (see Figure 2). Temperature and percent moisture will be monitored and turning will be employed as needed to maintain aerobic conditions and suitable elevated temperatures to expedite composting (thermophilic decomposition), reduce odors, and reduce pathogens. This stage should take about 2 to 6 weeks.

The windrows are typically 10 to 15 feet high and vary in width and length. Gravel or dirt access roads are maintained between the windrows. They are typically spaced to provide a 15-foot corridor between windrows for placement and turning operations. The prepared materials are placed in the windrows by a front-end loader. After placement, the front-end loader creates the desired windrow size and shape.

c. Moisture Modification

Control of the amount of water in the composting material is important to achieving optimum aerobic composting results. The amount of moisture in the windrow (percent moisture) should ideally be maintained between 45 and 60 percent. (Percent moisture = weight of water in moist compost ÷ moist (total) weight of compost.) Moisture levels outside these limits will cause a reduction in microbial activity, slowing the composting process.

Once the composting process begins, increased temperature and subsequent turning (aeration) typically causes a loss of moisture. Periodic observation or measurement of compost moisture in the windrows will determine the need for water addition during subsequent turnings. Turning of the piles with a front-end loader will be done in such a way as to thoroughly mix make-up water uniformly with the compost and to prevent runoff.

The exposed windrows will allow some rain to infiltrate the compost and increase the percent moisture. The facility staff will be aware of current moisture conditions and forecasted weather when determining the need for moisture modification of the windrows. Maintaining a triangular cross-sectional shape of the windrow can help reduce rainfall infiltration when moisture conditions are above normal or excessive. More frequent turning may be required in such cases to promote drying.

The grade of the composting area must be maintained to promote rapid drainage of stormwater runoff. Ponding of water in the composting area should not be allowed to occur.

d. Aeration (Turning)

Aeration of composting materials is necessary for aerobic biological processes. Aeration provides compost oxygenation, helps ensure process stability, and enables temperature control. Insufficient aeration can result in elevated temperatures that retard microbiological activity (slow the decomposition process). In addition, the compost may go anaerobic (lack of oxygen), a condition that causes odors and can produce plant toxins. The physical mixing during turning also breaks up air channels and clumps, blends materials from top to bottom in the windrow, and provides for uniform microbial activity. Compost temperature can also be controlled by windrow size.

Aeration and turning will be accomplished with a front-end loader. The loader bucket shall be raised to its maximum height, and then emptied gradually so as to promote cascading of the compost to maximize aeration. The frequency of turning will be dictated by temperature and moisture conditions as well as odor, if it should occur.

In order to maintain a high rate of decomposition, the temperature should ideally be within the range of 45 to 55 degrees C (113 to 131 degrees F). For destruction of pathogens, however, the temperature of the compost must be allowed to remain above 55 degrees C (131 degrees F) for at least three (3) days, and the compost must be aerated during that time to maintain elevated temperatures (15A NCAC 13B .1406(10)). This process also inactivates most weed seeds. The temperature can then be lowered to within the range for optimum decomposition (45 to 55 °C).

Caution should also be exercised to not allow mixing of compost materials that have undergone pathogen and weed seed destruction with those that haven't, either in the windrows or in equipment or vehicles used to process or transport the compost.

e. Compost Stabilization

Since the target market is a consumer of bulk quantities of blended soils and/or compost for soil amendment, a highly stabilized compost product is not envisioned. The stabilization stage, if employed, should take up to an additional 4 weeks.

The stabilizing of fresh compost to produce mature compost will be provided for as dictated by market demands. Stabilization is the gradual reduction of microbial activity in the presence of moisture and aeration, and is accomplished by continuing the aerated windrow composting process under the same controlled conditions as in the first stage. Thus, stabilization will be performed in the original windrows if required. Combining windrows of similar age may facilitate the stabilizing process. This will also maximize the space utilization of the compost area.

f. Refining and Curing

The compost will be refined by screening to remove oversize particles and foreign material and improve the consistency and quality of the final product. Prior to refining the compost, the addition of moisture to the windrows will be discontinued to interrupt microbial activity and allow the compost to cool and dry to a consistency suitable for screening.

Screening will normally occur in the treatment and processing area as the compost is transferred from the windrows to the final storage area (see Figure 2). Oversize material will be run back through the process or utilized as mulch. Foreign matter will be disposed of in a properly permitted landfill.

Curing will be accomplished in the windrows so that aerobic conditions, temperature and percent moisture can be monitored and managed.

g. Quality Control

The Composting Supervisor will be the responsible party for achieving and maintaining quality control standards in the composting process. The temperature in the windrows will be monitored and recorded at least 3 times per week, 48 hours apart during the elevated temperature phase to confirm the achievement and duration of the specified elevated temperature (at least 55 degrees C or 131 degrees F for 72 hours). Temperature will be measured manually by inserting a long-stem thermometer 18 to 36 inches into the piles at various locations no more than 50 feet apart. Compost moisture will be monitored regularly to assess the need for moisture addition. Moisture monitoring will consist of random, periodic manual/visual inspections of compost grab samples. Occasional

oven drying tests (moisture content on percent total weight basis) of samples taken from the windrows may be done to provide data to compare with the target limits (45 to 60 percent moisture).

Random, periodic manual/visual inspections of refined compost will be made for particle size verification and the presence of foreign material. Particle size distribution will be based on customer demand, but in no case shall man-made inerts be allowed to exceed 1 inch. These manual/visual inspections will also allow assessment and confirmation that the compost product is free from offensive odor and contains no sharp particles that would cause injury to persons handling the compost.

#### E. Stormwater Management

The site is managed in such a manner as to minimize standing water. Gravel or dirt roadways are maintained between each waste pile or windrow to allow surface water to flow between the piles. Stormwater is channeled into several ditches on the site and diverted to rock spillway outlets. Two (2) stormwater culverts are present on the site. The culverts collect surface water from the drainage ditches and divert the water under the gravel access road to prevent erosion of the road. Todco received General Permit No. NCG210000 from the NC Division of Water Quality for stormwater discharges under the National Pollutant Discharge Elimination System (NPDES) (copy enclosed in Appendix).

#### F. Equipment

Equipment normally used at the site includes the following:

- 914 G rubber tire loader, 963 track loader, and 236 skid steer loader
- JD 300 tractor
- 4060 West Salem horizontal hog grinder
- Morbark 1200 tub grinder
- CEC 16x5 Roadrunner screen
- IT 28 wheel loader
- Mack road tractors (3)
- Four open-top chip trailers (for storage prior to transport)
- Coloring machine and conveyor system
- 1100-gallon fire truck for dust control and fire suppression

#### G. Dust Control

Because many of the wood products entering the facility are dry when received, dust can result from material processing. The hog grinder is equipped with a sprayer at its entrance to wet the materials on the conveyor immediately prior to grinding to reduce dust release. Dust from vehicle movement on dry dirt surfaces and from handling dry processed materials is controlled with a water truck, by way of either a spray bar or a hose nozzle. Dust controls are implemented as needed to prevent other than incidental releases of dust beyond the property boundaries.

#### H. Extreme Weather

In the event of extreme weather (e.g., severe storms, heavy snow and ice, etc.), facility operations are either discontinued until the weather passes, or modified to utilize existing mobile equipment and auxiliary power. The mobile tub grinder can replace the hog grinder for temporary operations during power outages, and portable generators are available on site for other power needs (scale, scalehouse, etc.). The facility's heavy equipment is used to clear on-site roads of snow and debris. Excess on-site storage capacity is available for temporary storage of incoming feedstocks during periods of compromised material processing or feedstock surges due to storm damage.

#### I. Fire Response

The facility is located within the service area of the Holly Grove Volunteer Fire Department. A letter from the fire department stating that an incident at the facility will be responded to with the appropriate equipment is included in the Appendix.

#### J. Record Keeping and Reporting

Records are kept at the site regarding wastes received, and wastes processed and sold (pine bark, mulch, soil conditioner, boiler fuel, etc.). Records include customer or vendor name and address, type and weight of material received and sold, and date of transaction. An annual report is prepared each year for the period July 1 through June 30 and submitted to the Division of Waste Management by August 1.

The annual report will document the total quantity and types of waste received, including waste received from local governments, and the quantities of compost and mulch produced and sold. It will also document temperature monitoring results to demonstrate compliance with pathogen destruction criteria. For reporting of volume-based transactions on a weight basis, processed volumes will be converted using a factor of 500 pounds per cubic yard (0.25 tons/CY).

The annual report will follow the following general outline:

- (1) Facility name, address, and permit number;
- (2) Total quantity, in tons, and type(s) of waste received at the facility, including waste received from local governments;
- (3) Total quantity, in tons, and type(s) of waste processed into compost;
- (4) Total quantity, in tons, and type(s) of compost produced at the facility, by product classification;
- (5) Total quantity, in tons, and type(s) of compost removed for use or disposal from the facility, by product classification, along with a general description of the market;
- (6) Summary of temperature monitoring, by month; and
- (7) Results of any analytical tests performed.

Table 1

Piezometer Information and  
Groundwater Data

TABLE 1  
WELL INFORMATION AND GROUNDWATER DATA

Piezometer No.	Total Depth (ft btoc)	Date Water Level Measured	Depth to Water (ft btoc)	Stickup (ft, TOC to GS)	Depth to Water (ft, bgs)
P-1	4.08	4/4/2002	Dry	0.90	> 3.18
		4/16/2002	2.81		1.91
		4/23/2002	Dry		> 3.18
		5/8/2002	Dry		> 3.18
		6/3/2002	Dry		> 3.18
		11/18/2003	Dry		> 3.0
P-2	3.19	4/4/2002	Dry	1.08	> 2.11
		4/16/2002	Dry		> 2.11
		4/23/2002	Dry		> 2.11
		5/8/2002	Dry		> 2.11
		6/3/2002	Dry		> 2.11
		11/18/2003	unable to locate		> 2.11
P-3	2.04	4/4/2002	Dry	0.25	> 1.79
		4/16/2002	Dry		> 1.79
		4/23/2002	Dry		> 1.79
		5/8/2002	Dry		> 1.79
		6/3/2002	Dry		> 1.79
		11/18/2003	unable to locate		> 1.79
P-4	2.80	4/4/2002	Dry	0.76	> 2.04
		4/16/2002	Dry		> 2.04
		4/23/2002	Dry		> 2.04
		5/8/2002	Dry		> 2.04
		6/3/2002	Dry		> 2.04
		11/18/2003	Dry		> 2.04
P-5	2.41	4/4/2002	Dry	1.04	> 1.37
		4/16/2002	Dry		> 1.37
		4/23/2002	Dry		> 1.37
		5/8/2002	Dry		> 1.37
		6/3/2002	Dry		> 1.37
		11/18/2003	Dry		> 1.37
P-6	4.66	4/16/2002	Dry	0.80	> 3.86
		4/23/2002	Dry		> 3.86
		5/8/2002	Dry		> 3.86
		6/3/2002	Dry		> 3.86
		11/18/2003	unable to locate		> 3.86
P-7	4.24	4/16/2002	Dry	2.30	> 1.94
		4/23/2002	Dry		> 1.94
		5/8/2002	Dry		> 1.94
		6/3/2002	Dry		> 1.94
		11/18/2003	4.24		1.94
P-8	4.65	4/16/2002	Dry	2.20	> 2.45
		4/23/2002	Dry		> 2.45
		5/8/2002	Dry		> 2.45
		6/3/2002	4.58		2.38
		11/18/2003	4.56		2.36

Notes:

ft btoc = feet below the top of the well casing

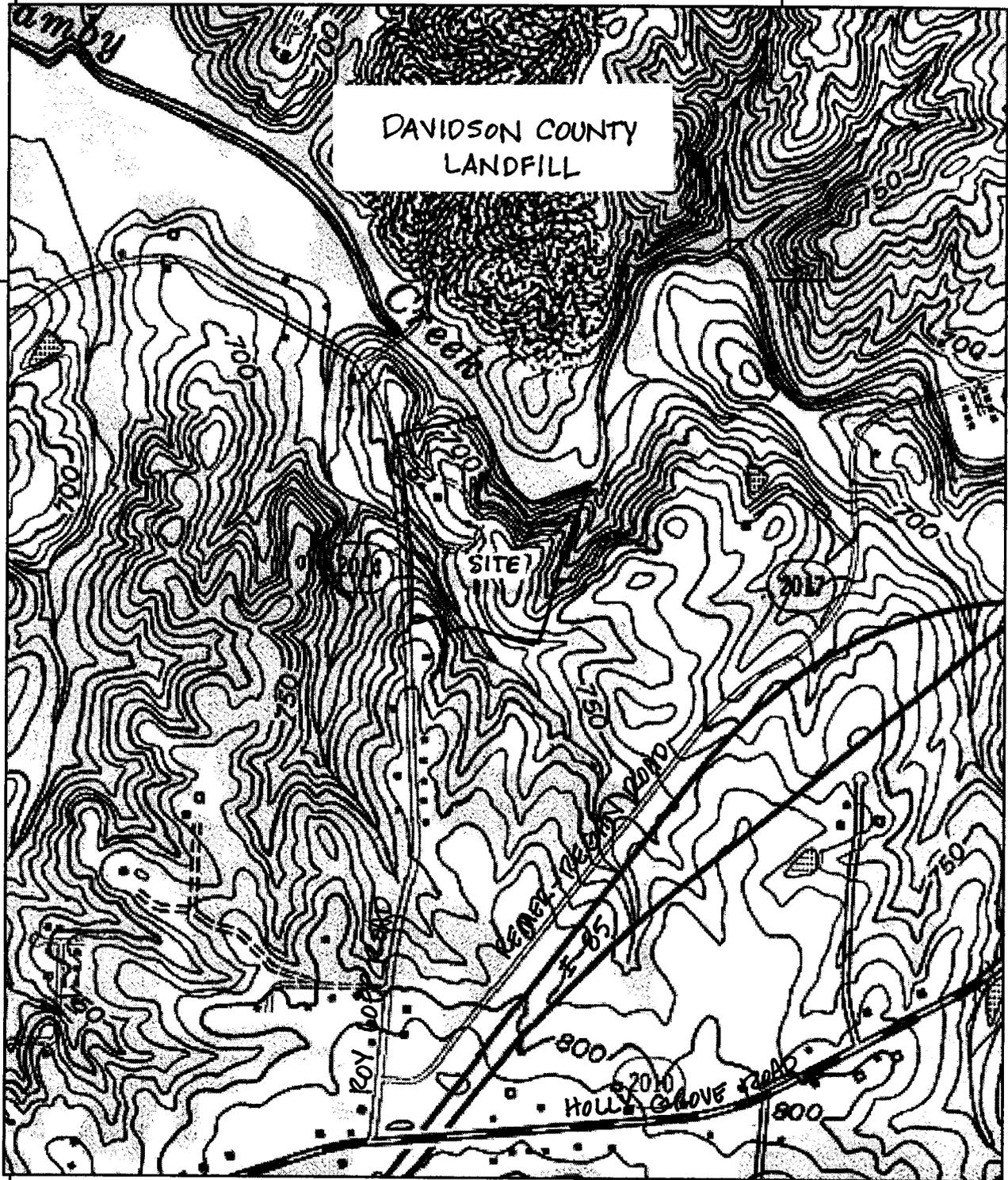
ft bgs = feet below the ground surface

Figures

80°11'00" W

WGS84 80°10'00" W

35°50'00" N



0 1000 FEET



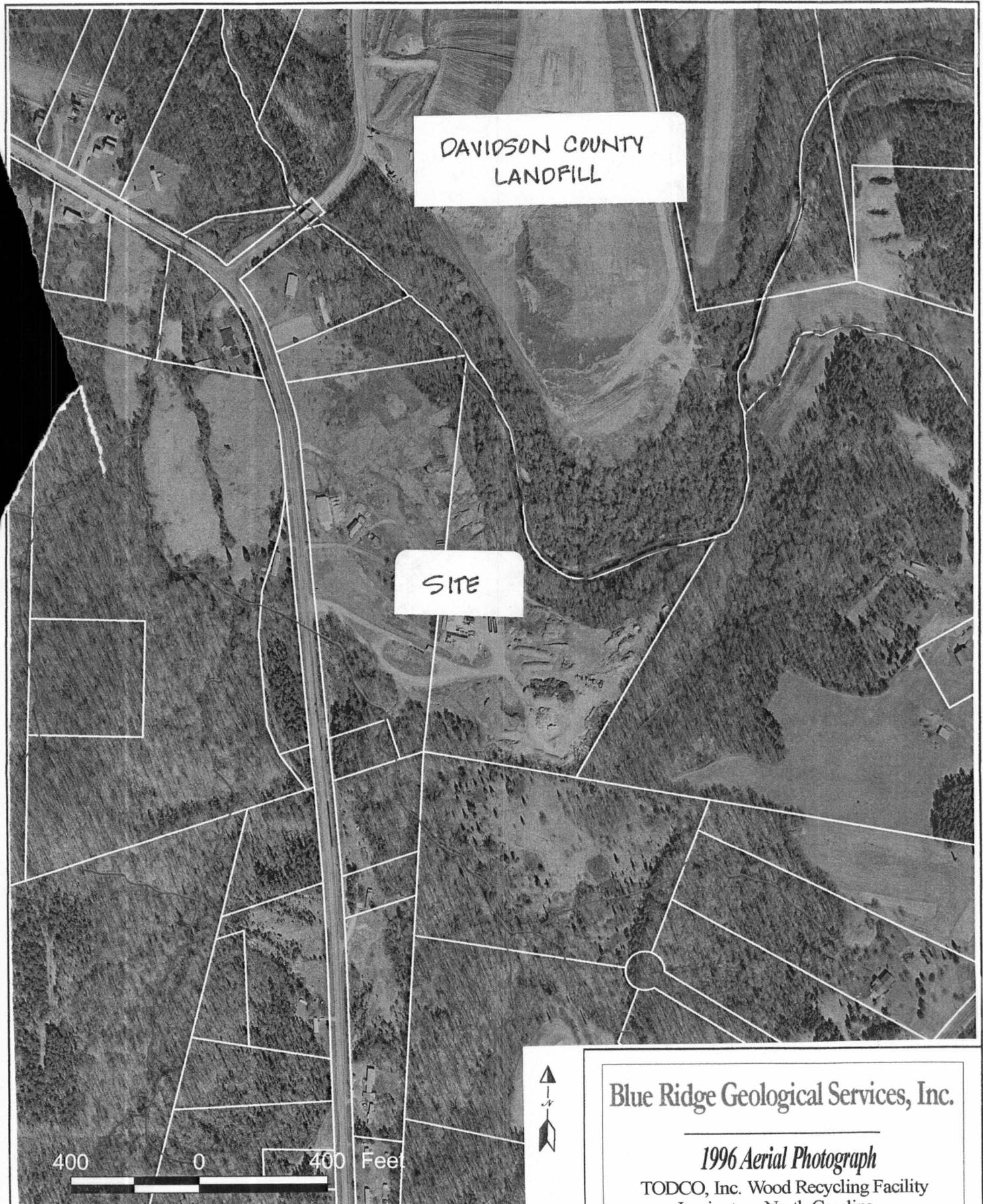
Blue Ridge Geological Services, Inc.

*Site Location Map*

TODCO, Inc. Wood Recycling Facility  
Lexington, North Carolina

Ref: USGS Lexington East, NC dated 1950 photorevised 1994

Figure 1



DAVIDSON COUNTY  
LANDFILL

SITE

400 0 400 Feet

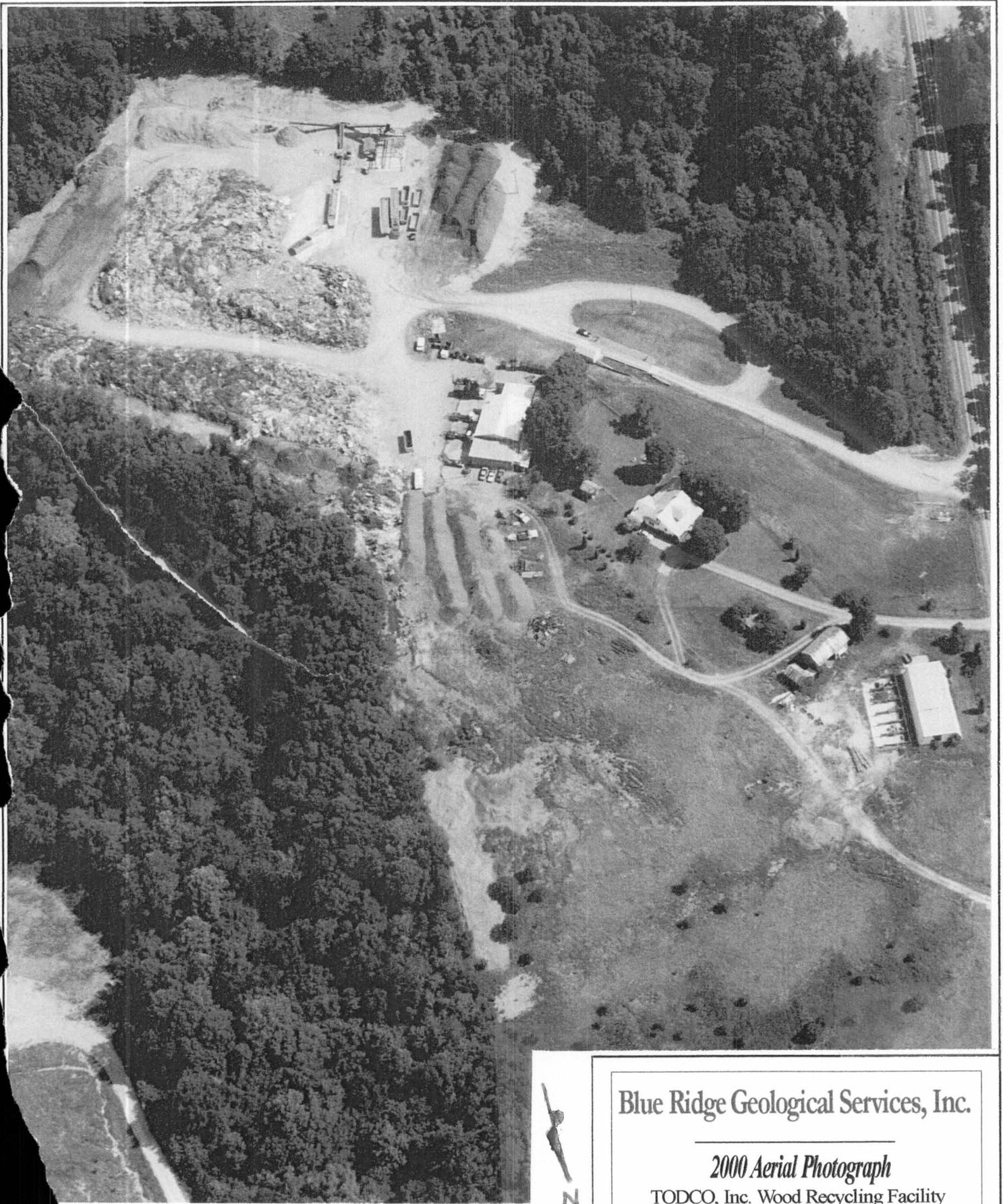
Blue Ridge Geological Services, Inc.

*1996 Aerial Photograph*

TODCO, Inc. Wood Recycling Facility  
Lexington, North Carolina

Ref: Davidson County Planning and Zoning Office

Figure 3

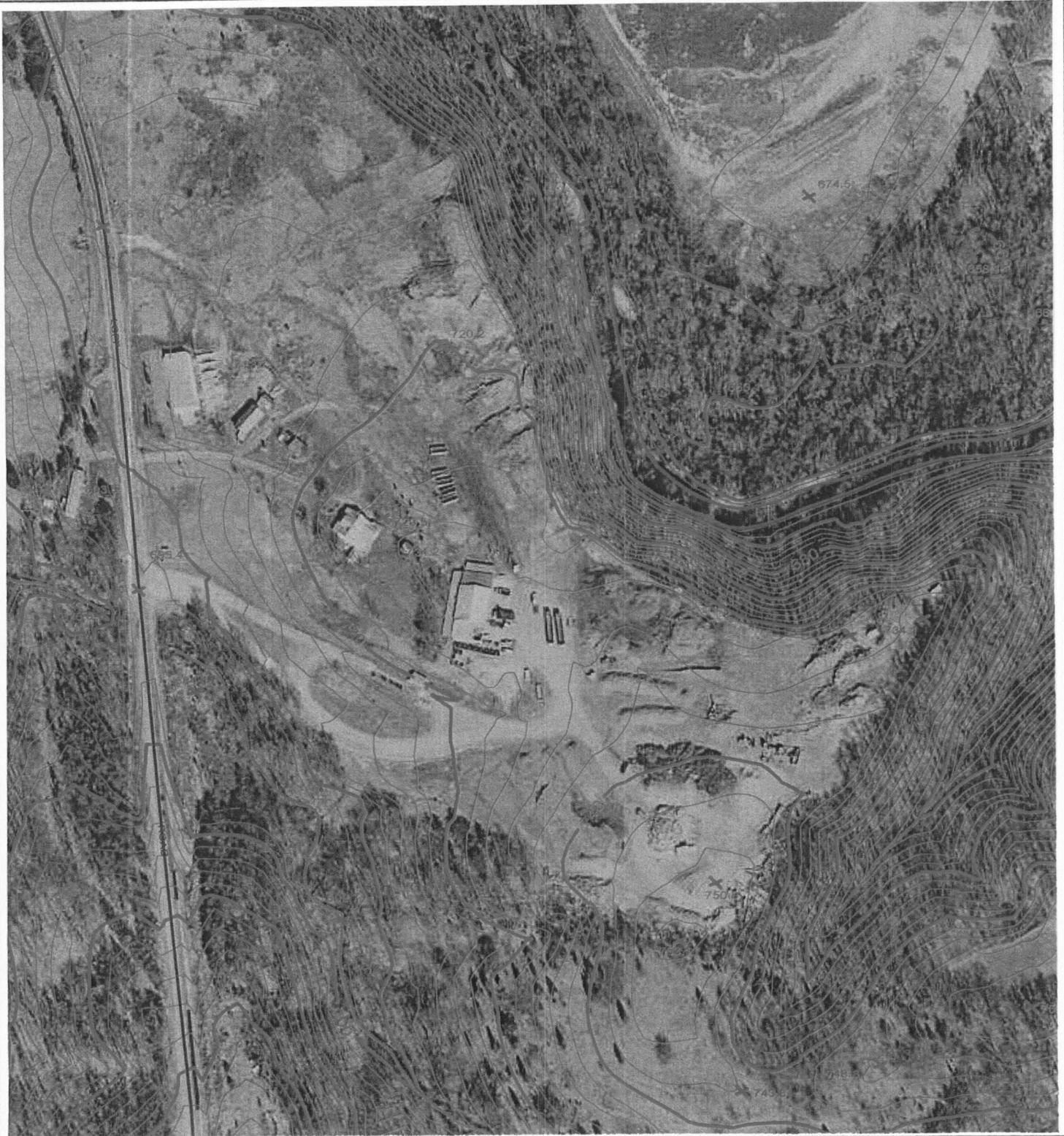


Blue Ridge Geological Services, Inc.

*2000 Aerial Photograph*

TODCO, Inc. Wood Recycling Facility  
Lexington, North Carolina

Figure 4



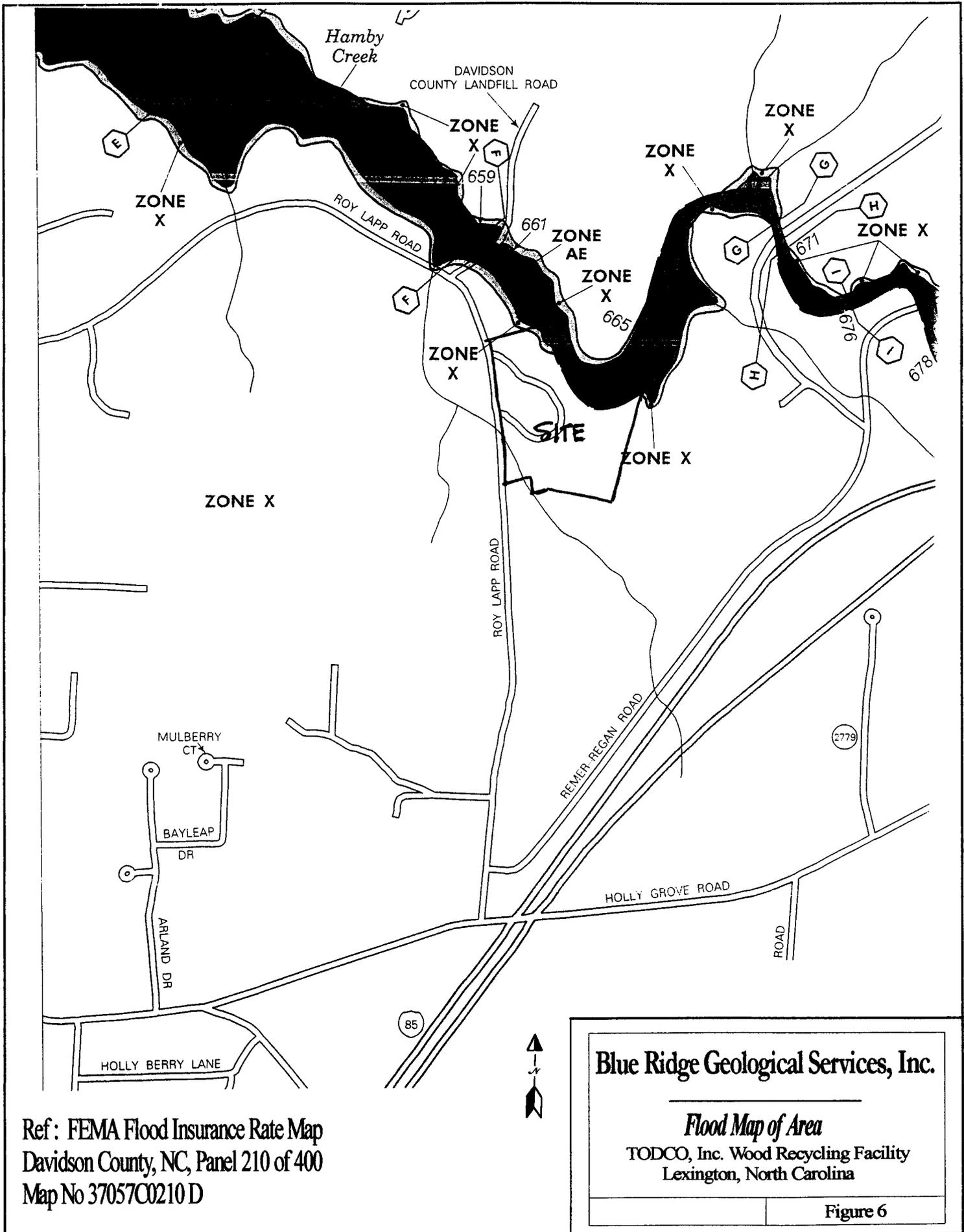
Scale: 1 inch = 200 feet  
Ref: 1996 Aerial photograph  
Davidson County Planning and Zoning Office

Blue Ridge Geological Services, Inc.

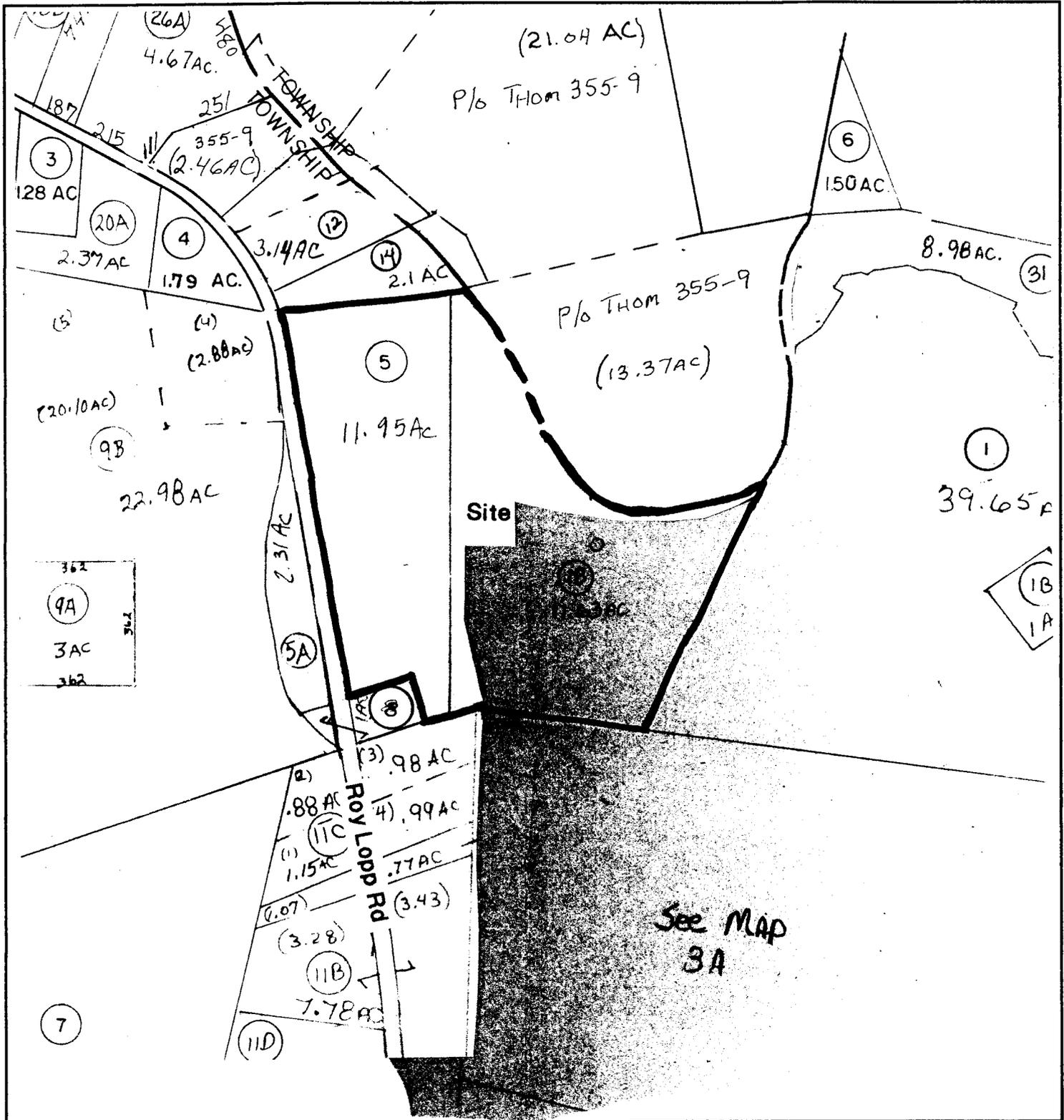
*Topographic Map*

TODCO, Inc. Wood Recycling Facility  
Lexington, North Carolina

Figure 5



Ref : FEMA Flood Insurance Rate Map  
Davidson County, NC, Panel 210 of 400  
Map No 37057C0210 D



Scale: 1 inch = 400 feet  
 Ref: Davidson County Tax Maps 2 and 3  
 Davidson County Tax Office



**Blue Ridge Geological Services, Inc.**

*Tax Map*

TODCO, Inc. Wood Recycling Facility  
 Lexington, North Carolina

Figure 7

Appendix



**EcoLogic Associates, P.C.**  
218-4 Swing Rd. • Greensboro, NC 27409  
(336) 855-8108 • Fax (336) 855-7688  
[www.ecologic-nc.com](http://www.ecologic-nc.com)

April 11, 2002

Todd Warfford, President  
TodCo, Inc.  
1123 Roy Lopp Road  
Lexington, NC 27292

**RE: Natural Resources Inventory  
Todco Inc. Wood Recycling Facility**

A site visit to the existing wood recycling facility was conducted on April 8, 2002 by the undersigned. The purpose of the visit was to document the presence or absence of rare or endangered species and/or their habitat. The recycling facility covers about 85 percent of the property. The wood processing facility is located in the center portion of the property, surrounded by a buffer of relatively undisturbed forest on the north, east and south sides. We reconnoitered the entire property by walking inside the perimeter of the property line, with occasional excursions along gullies, through forested areas and along the creeks. The locations disturbed by the current commercial activity are not expected to change; the creek corridor buffers will not be disturbed.

Along Hamby Creek (north and west margins of the site), a Piedmont Alluvial Forest occurs, with some of the canopy trees on site being Box elders, Sycamores, Tulip trees and River Birch in the wetter sites. None of these trees are very large. A small floodplain bench occurs along the edge of Hamby Creek. The largest trees occur along the edge of the creek. This area is very steep, with soft moist soils and a thick cover of Japanese Honeysuckle in most places. In less weedy areas, some wildflowers like toad shade trilliums, dog-tooth violets and evergreen gingers occur. Some of the upper slope area was disturbed by logging and debris pushed over the edge when the top of the hill was flattened and enlarged.

The property is bordered along the southern edge by a small valley with an ephemeral stream, a tributary of Hamby Creek. This valley is less steep, drier and covered with a more mature Oak-Hickory Forest. The eastern edge of the property is the Roy Lopp Road corridor.

Davidson County does have listed rare species that have been reported recently, as well as obscure and historic listings that are vague with regard to exact locations, so we checked for these on the Todco site as well. Our visit during the spring is a good time to conduct an inventory, as most plants are actively growing and should be easy to spot. It is also possible to use a combination of habitat and land-use analysis and knowledge of the target species to make a determination about possible occurrence. Many rare species

require rare habitats like upland wetland pools, fire maintained meadows or soils of high pH over mafic rocks, none of which occur at this site.

Prior to the visit, we checked with the North Carolina Natural Heritage Program for the current list of rare species that might be found in the East Lexington area of Davidson County. In all of Davidson County there are current records of seven (7) listed rare plants, one fish, one crustacean and one bird. There are also historic records of 3 to 4 other plants that have not been noted in the recent past. Several of these species are found in open, thin woods or along roadsides over mafic rocks, usually maintained by fire or mowing. This group includes the Piedmont Indigo-bush (*Amorph Schwerinii*), Georgia Aster (*Aster georgianus*), Heller's Rabbit Tobacco (*Gnaphalium helleri*), Schweinitz's Sunflower (*Helianthus schweinitzii*) and Indian Physic (*Porteranthus stipulatus*). No suitable habitat for these species was noted during our visit. Several other species like Dissected Toothwort (*Cardamine dissecta*) are found along the riparian bottomlands in the western part of the County; however, they were not identified on this site. The listed fish and crayfish species are found in other parts of the County and in habitat types that are not found in areas impacted by the Todco commercial activity.

The only rare species listed from the Lexington East quadrangle (USGS map unit) at this time are the Greensboro Burrowing Crayfish (*Cambarus catagius*), a state-listed Significantly Rare species, and the Glade Milkvine (*Matelea decipiens*), which is a historic reference not seen recently. These species were not noted on the property owned by Todco.

Based on the results of the field visit, it is our opinion that the commercial wood recycling activity on the property of Todco, Inc. does not and will not impact any occurrences of rare or endangered species. Should additional investigations be required, please contact us.

Sincerely,

EcoLogic Associates, P.C.



Kenneth A. Bridle, Ph.D.  
Principal Biologist

Mail To: Rt. 1, Box 686, Lexington, NC 27292

WARRANTY DEED-Form WD-601

Printed and for sale by James Williams & Co., Inc., Yadkinville, N. C.

STATE OF NORTH CAROLINA, DAVIDSON County.

THIS DEED, Made this 16th day of May, 1990, by and between Albert Lee Scarlett and wife, Dorothy Lopp Scarlett

of Davidson County and state of North Carolina, hereinafter called Grantor, and Sherry Scarlett Warford (1/2 undivided interest) and Todd Avery Warford (1/2 undivided interest) Davidson County and State of North Carolina, hereinafter called Grantee, whose permanent mailing address is Rt. 1, Box 686, Lexington, NC 27292

WITNESSETH: That the Grantor, for and in consideration of the sum of Ten and 00/100 Dollars and other good and valuable considerations to him in hand paid by the Grantee, the receipt whereof is hereby acknowledged, has given, granted, bargained, sold and conveyed, and by these presents does give, grant, bargain, sell, convey and confirm unto the Grantee, his heirs and/or successors and assigns, premises in Conrad Hilll Township, Davidson County, North Carolina, described as follows:

BEGINNING at a large stone, Conrad and Reagan corner, and being the southeast corner of tract herein described; thence South 74° 40' West 373.05 feet to an iron stake in center line of State Road #2014; thence with the center line of said road the following courses and distances: North 35° 17' West 145.70 feet; North 20° 36' West 97.00 feet; North 2° 51' West 285.42 feet; North 7° 02' East 142.30; North 20° 02' East 177.40 feet; North 11' 17" East 100.00 feet; North 4° 32' East 100.00 feet; North 1° 44' West 149.00 feet; North 9° 56' West 121.90 feet to a point in the center of State Road #2014, and designated by iron stakes on each bank of said road; thence with a new line, now Brinkley, North 84° 51' East 608.10 feet to an iron stake in Hamby's Creek, Conrad and Brinkley corner; thence with Conrad line South 9° 13' West 1241.80 feet to the point of beginning containing 15.26 acres.

For reference see Deed Book 80, Page 176; Deed Book 121, Page 444; Deed Book 439, Page 602.

LESS AND EXCEPT 1.00 acre deeded by previous deed by Marvin J. Tysinger and wife, Josephine Tysinger.

FILED BK. 711 PG. 838 W MAY 18 10 49 AM '90 U. RONA... CUT REGISTRY OF DEEDS DAVIDSON, N.C.

No Title Examination

The above land was conveyed to Grantor by See Book No. Page TO HAVE AND TO HOLD The above Described premises, with all the appurtenances thereto belonging, or in any wise appertaining, unto the Grantee, his heirs and/or successors and assigns forever.

And the Grantor covenants that he is seized of said premises in fee, and has the right to convey the same in fee simple; that said premises are free from encumbrances (with the exceptions above stated, if any); and that he will warrant and defend the said title to the same against the lawful claims of all persons whomsoever.

When reference is made to the Grantor or Grantee, the singular shall include the plural and the masculine shall include the feminine or the neuter. IN WITNESS WHEREOF, The Grantor has hereunto set his hand and seal, the day and year first above written. Albert Lee Scarlett (SEAL) Dorothy Lopp Scarlett (SEAL)

STATE OF NORTH CAROLINA, DAVIDSON COUNTY. I, the undersigned, a Notary Public of said County, do hereby certify that Albert Lee Scarlett and wife, Dorothy Lopp Scarlett

Grantor, personally appeared before me this day and acknowledged the execution of the foregoing deed.

Witness my hand and notarial seal, this 17th day of May, 1990. My Commission Expires June 26, 1991 Nancy J. Howard N. P. (SEAL)

STATE OF NORTH CAROLINA, COUNTY. I, a Notary Public of said County, do hereby certify that

Grantor, personally appeared before me this day and acknowledged the execution of the foregoing deed.

Witness my hand and notarial seal, this the day of 19 N. P. (SEAL)

STATE OF NORTH CAROLINA, Davidson County. The foregoing certificate(s) of Nancy J. Howard

is (are) certified to be correct. This instrument was presented for registration this 15th day of May, 1990 at A. M., P. M., and duly recorded in the office of the Register of Deeds of Davidson County, North Carolina, in Book Page

This the day of A. D., 1990 by Ronald W. Callicutt Register of Deeds MARY E. PHOENIX Assistant, Deputy Register of Deeds

This Deed drawn by Scott V. Curry, Attorney, 111 West Center Street, Lexington, NC 27292

7373

BK 112 PG 0538

FILED

99 FEB 19 PM 3:23

RONALD W. CALICOTT  
REGISTER OF DEEDS  
DAVIDSON COUNTY, N.C.

14.00

Excise Tax \$ 0

Recording Time, Book and Page

Tax Lot No. 05-002-0-000-0014 (whole) Parcel Identifier No. ....  
05-003-0-000-0018 (whole) .....  
Verified by ..... County on the ..... day of ..... 19.....  
by .....

Mell after recording to Grantee .....

This instrument was prepared by Charles H. McGirt, 10 LSB Plaza, Lexington, NC 27292

Brief description for the Index

### NORTH CAROLINA GENERAL WARRANTY DEED

THIS DEED made this 19th day of February, 1999, by and between

**GRANTOR**  
Dorothy L. Scarlett (widow)  
717 County Home Road  
Lexington, NC 27292

**GRANTEE**  
Todd Avery Warford and wife,  
Cherie Dawn Walker Warford  
1123 Roy Lopp Road  
Lexington, NC 27292

Enter in appropriate block for each party: name, address, and, if appropriate, character of entity, e.g. corporation or partnership.

The designation Grantor and Grantee as used herein shall include said parties, their heirs, successors, and assigns, and shall include singular, plural, masculine, feminine or neuter as required by context.

WITNESSETH, that the Grantor, for a valuable consideration paid by the Grantee, the receipt of which is hereby acknowledged, has and by these presents does grant, bargain, sell and convey unto the Grantee in fee simple, all that certain lot or parcel of land situated in the City of Lexington, Conrad Hill Township,

Davidson County, North Carolina and more particularly described as follows:

SEE EXHIBIT "A" ATTACHED HERETO AND INCORPORATED HEREIN BY REFERENCE.

0004704

SoftPro

The property hereinabove described was acquired by Grantor by instrument recorded in Book 501, Page 649; Book... 504, Page 782, Davidson County Registry.

A map showing the above described property is recorded in Plat Book ..... page..... TO HAVE AND TO HOLD the aforesaid lot or parcel of land and all privileges and appurtenances thereto belonging to the Grantee in fee simple.

And the Grantor covenants with the Grantee, that Grantor is seized of the premises in fee simple, has the right to convey the same in fee simple, that title is marketable and free and clear of all encumbrances, and that Grantor will warrant and defend the title against the lawful claims of all persons whomsoever except for the exceptions hereinafter stated. Title to the property hereinabove described is subject to the following exceptions: All easements, rights-of-way, restrictions and reservations of record. 1999 Ad Valorem Taxes.

IN WITNESS WHEREOF, the Grantor has hereunto set his hand and seal, or if corporate, has caused this instrument to be signed in its corporate name by its duly authorized officers and its seal to be hereunto affixed by authority of its Board of Directors, the day and year first above written.

Corporate Name: Dorothy L. Scarlett (Widow) (SEAL)
By: \_\_\_\_\_ (SEAL)
President: \_\_\_\_\_ (SEAL)
ATTEST: \_\_\_\_\_ (SEAL)
Secretary (Corporate Seal): \_\_\_\_\_ (SEAL)

USE BLACK INK ONLY

SEAL-STAMP NORTH CAROLINA, Davidson County. I, a Notary Public of the County and State aforesaid, certify that Dorothy L. Scarlett (Widow) Grantor, personally appeared before me this day and acknowledged the execution of the foregoing instrument. Witness my hand and official stamp or seal, this 19th day of February, 1999. My commission expires: 02-30-02 Linda W. Rankin Notary Public

LINDA W. RANKIN Notary Public, State of North Carolina Qualified in Davidson County

SEAL-STAMP NORTH CAROLINA, \_\_\_\_\_ County. I, a Notary Public of the County and State aforesaid, certify that \_\_\_\_\_ Secretary of personally came before me this day and acknowledged that he is \_\_\_\_\_ a North Carolina corporation, and that by authority duly given and as the act of the corporation, the foregoing instrument was signed in its name by its \_\_\_\_\_ President, sealed with its corporate seal and attested by \_\_\_\_\_ Secretary. Witness my hand and official stamp or seal, this \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_. My commission expires: \_\_\_\_\_ Notary Public

The foregoing Certificate(s) of Linda W. Rankin is/are certified to be correct. This instrument and this certificate are duly registered at the date and time and in the Book and Page shown on the first page hereof. W. Callant REGISTER OF DEEDS FOR Davidson COUNTY By Mitchell Obendorf Deputy/Assistant - Register of Deeds

## EXHIBIT "A"

TRACT I:

BEGINNING at a point in the center of N.C.S.R. #2014 at a 36" culvert, Ball's corner. Thence with the center of branch and a new line North 44 deg. 49' East 490.00 feet to the intersection of branch and Hamby's Creek. (Said point being South 22 deg. 05' East 90.00 + or - from the southwest corner of Al Scarlett 26.00 acre tract). Thence down the north east bank of Hamby's Creek the following courses and distances, South 22 deg. 05' East 200.00 feet, Thence South 37 deg. 50' East 146.00 feet, thence South 51 deg. 35' East 161.00 feet, thence South 44 deg. 05' East 312.00 feet, thence South 20 deg. 23' East 117.65 feet to an iron stake in the center of Hamby's Creek, Conrad corner, now Al Scarlett. Thence South 84 deg. 51' West 608.10 feet to a point in the center of N.C. S.R. #2014 Ball's corner. Thence with the center of said road the following courses and distances, North 16 deg. 53' West 244.50 feet, thence North 37 deg. 14' West 144.80 feet, thence North 54 deg. 55' West 160.00 feet to the point of beginning, containing 7.628 acres and being a portion of a 55.01 acre tract, and located in the south east corner of same, and being a part of the W. A. Lopp property.

LESS AND EXCEPT THAT PROPERTY HERETOFORE CONVEYED to the County of Davidson, a Body Corporate and Politic, recorded in Book 606, Page 476, Davidson County Registry, and THAT 3.139 ACRE TRACT HERETOFORE CONVEYED to Paul Arthur Warford and wife, Sherry S. Warford by deed recorded in Book 580, page 112, Davidson County Registry.

The above referenced property is all of that property described on the Davidson County Tax records as Conrad Hill Township, Tax Map 2, Lot 14, containing 2.10 acres, more or less.

TRACT II:

BEGINNING at a stone the southwest corner of tract herein described, now A. L. SCARLETT and REAMER REGAN corner. Thence with A. L. Scarlett line formerly W. A. Lopp North 9 deg. 13 min. East 1241.80 feet to an iron stake in Hamby's Creek. Thence with W. A. Lopp heirs and H. D. Eddinger line North 80 deg. 37 min. East a total of 951.00 feet to a point in the center of Hamby's Creek new corner to A. E. Conrad (iron stake set 25.00 feet on west bank). Thence with the center of Hamby's Creek as it meanders a chord bearing and distance of South 10 deg. 21 min. West 811.70 feet to an iron stake on the southeast bank of said creek, thence with a new marked line to A. E. Conrad South 22 deg. 50 min. West 869.00 feet to an iron stake new corner on Reamer Regan line. Thence with Reamer Regan line North 75 deg. 44 min. West 533.65 feet to the point of beginning containing 25.87 acres more or less and being the western end of a 105.00 acres tract referred to in deed book 153 pages 508 and 509 in the Register of Deed's Office for Davidson County, North Carolina

BK 112 | PG 054

**LESS AND EXCEPT THAT PORTION OF THE PROPERTY HERETOFORE CONVEYED to Davidson County, a Body Corporate and Politic, by deed recorded in Book 625, Page 978, and re-recorded in Book 625, Page 59, Davidson County Registry.**

**The above referenced Tract II is all of that property shown on the Davidson County Tax records as Conrad Hill Township, Tax Map 3, Lot 18, containing 11.63 acres, more or less.**



**DAVIDSON COUNTY PLANNING DEPARTMENT**

GOVERNMENTAL CENTER  
913 GREENSBORO STREET  
POST OFFICE BOX 1067  
LEXINGTON, NORTH CAROLINA 27293-1067

TOLL FREE NUMBERS:  
LEXINGTON 336-242-2220  
THOMASVILLE 336-472-8016  
WINSTON SALEM 336-723-7890 EXT. 2220  
DENTON 336-859-2194 EXT. 2220

GUY L. CORNMAN, III  
PLANNING DIRECTOR

June 3, 2002

Mr. Todd Warfford  
C/O Todco Inc.  
1123 Roy Lopp Road  
Lexington, NC 27292

To Whom It May Concern:

This letter is in reference to property owned by Todd A. & Cherie Warfford located at 1123 Roy Lopp Road. Said property is further described as Conrad Hill Township, Tax Map 3, Lot 18 and is in a LI, Limited Industrial District.

A wood recycling facility is a permitted use within a LI district. To the best of my knowledge, the existing facility meets all the requirements of the Davidson County Zoning Ordinance.

Should you need any additional information, please contact me at 336-242-2227.

Sincerely,

A handwritten signature in cursive script that reads "John H. Mendenhall".

John H. Mendenhall,  
Zoning Officer



PHONE 248-5420

**HOLLY GROVE FIRE DEPARTMENT  
INCORPORATED  
2211 EAST HOLLY GROVE ROAD  
LEXINGTON, NORTH CAROLINA**

June 17, 2002

Mark Taylor  
Ecologic  
218-4 Swing Rd  
Greensboro, NC 27409

Mr. Taylor,

This letter is to verify that Todco Inc., 1123 Roy Lopp Rd, Lexington, NC is located inside the five mile response district of the Holly Grove Fire Department. Our station currently houses three class A pumpers and a brush unit. We also have a county wide mutual aid agreement for additional resources as necessary. Please call if you have any questions.

Thank you,

A handwritten signature in black ink, appearing to read "Paul Jarrett", written in a cursive style.

Paul Jarrett  
Fire Chief

Cc/ Todd Warfford

State of North Carolina  
Department of Environment  
and Natural Resources  
Division of Water Quality

Michael F. Easley, Governor  
William G. Ross Jr., Secretary  
Alan W. Klimek, Director



October 3, 2003

Mr. Todd Warfford  
TODCO, Inc.  
1123 Roy Lopp Road  
Lexington, North Carolina 27292

Subject: General Permit No. NCG210000  
TODCO, Inc.  
COC NCG210362  
Davidson County

Dear Mr. Warfford:

In accordance with your application for discharge permit received on September 16, 2003, we are forwarding herewith the subject certificate of coverage to discharge under the subject state - NPDES general permit. This permit is issued pursuant to the requirements of North Carolina General Statute 143-215.1 and the Memorandum of Agreement between North Carolina and the US Environmental Protection agency dated May 9, 1994 (or as subsequently amended).

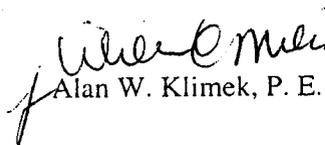
If any parts, measurement frequencies, or sampling requirements contained in this permit are unacceptable to you, you have the right to request an individual permit by submitting an individual permit application. Unless such demand is made, this certificate of coverage shall be final and binding.

Please take notice that this certificate of coverage is not transferable except after notice to the Division of Water Quality. The Division of Water Quality may require modification or revocation and reissuance of the certificate of coverage.

This permit does not affect the legal requirements to obtain other permits which may be required by the Division of Water Quality or permits required by the Division of Land Resources, Coastal Area Management Act, or any other Federal or Local governmental permit that may be required.

If you have any questions concerning this permit, please contact Ken Pickle at telephone number (919) 733-5083 ext. 584.

Sincerely,

  
Alan W. Klimek, P. E.

cc: Winston-Salem Regional Office  
Central Files  
Stormwater and General Permits Unit Files

SWU-259-011001

STATE OF NORTH CAROLINA  
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES  
DIVISION OF WATER QUALITY

GENERAL PERMIT NO. NCG210000  
CERTIFICATE OF COVERAGE No. NCG210362

STORMWATER DISCHARGES

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provision of North Carolina General Statute 143-215.1, other lawful standards and regulations promulgated and adopted by the North Carolina Environmental Management Commission, and the Federal Water Pollution Control Act, as amended,

TODCO, Inc.

is hereby authorized to discharge stormwater from a facility located at

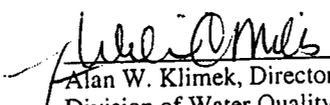
TODCO, Inc.  
1123 Roy Lopp Road  
Lexington, North Carolina  
Davidson County

to receiving waters designated as Hamby Creek, a class C water in the Yadkin River Basin in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in Parts I, II, III, IV, V, and VI of General Permit No. NCG210000 as attached.

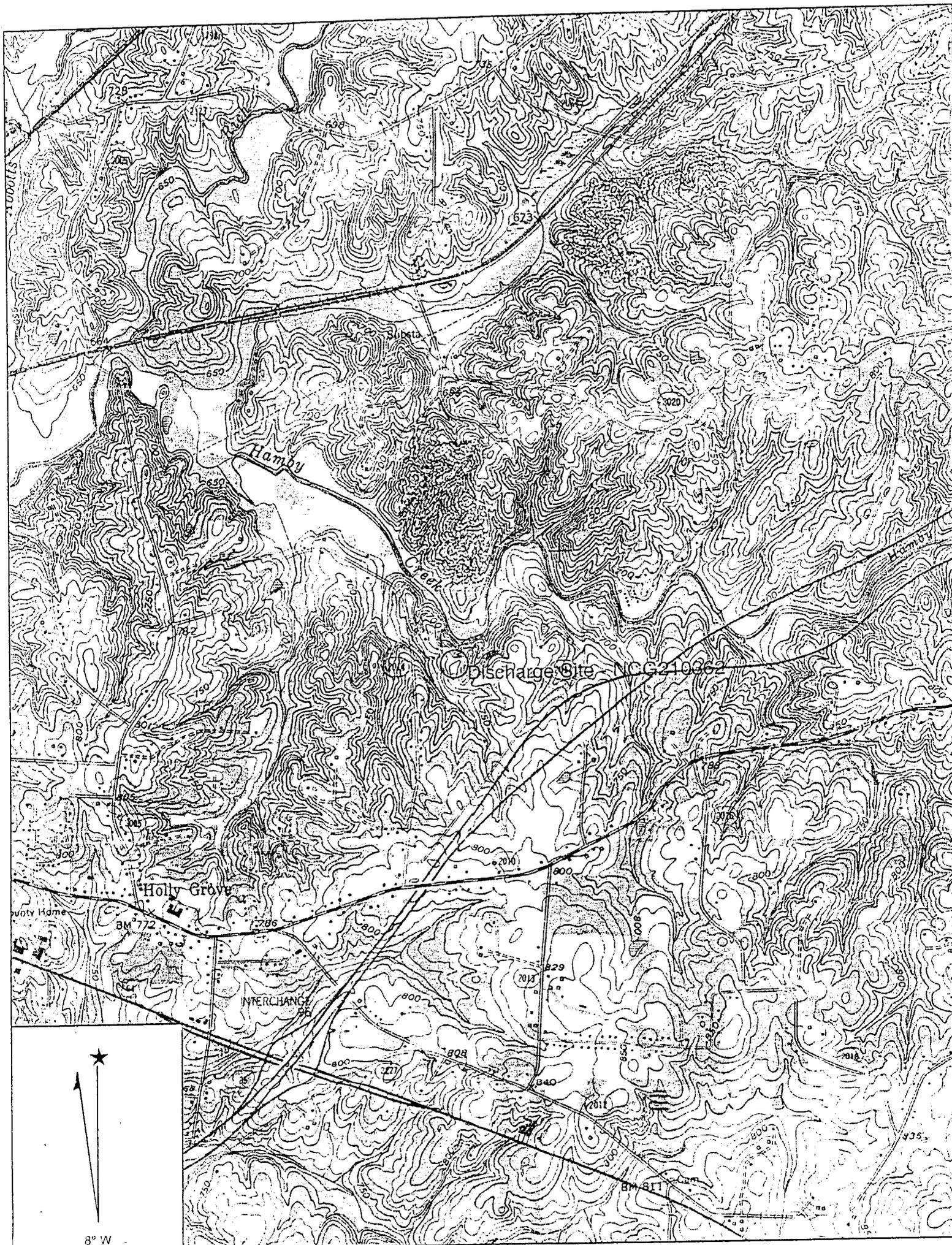
This certificate of coverage shall become effective October 3, 2003.

This Certificate of Coverage shall remain in effect for the duration of the General Permit.

Signed this day October 3, 2003.

  
Alan W. Klimek, Director  
Division of Water Quality

By Authority of the Environmental Management Commission



Markers

Name: Discharge Site - NCG210362

Short Name: Dschrg

Coordinates: 035° 49' 41.9" N, 080° 10' 20.8" W

Comment: TODCO, Inc., subbasin 03-07-07, Yadkin River Basin, Davidson County, Hamby  
Creek, class C, USGS quad D18SW