

**WOMMACK & SONS, INC.**  
**P.O. BOX 431**  
**514 MULBERRY STREET**  
**WELDON, NORTH CAROLINA 27890**

APRIL 30 2001



Mr. James Coffey  
Permitting Branch Supervisor  
DEHNR  
Division of solid Waste Management  
401 Oberlin Road, Suite 150  
1646 Mail Service Center  
Raleigh, North Carolina 27699-1646

Subject;

Notification of coal combustion by-product structural  
fill in Halifax County, Weldon, North Carolina 27890

Dear Mr. Coffey;

In accordance with Section. 1703A, Wommack & Sons, Inc. is hereby submitting notice to your division of a proposal to use coal combustion by-product as structural fill for a site as shown on the attached construction plan.

- A. Project starting date: November 1998  
Completion Date: December 2003
  
- B. Volume Estimate: Site 716,200 C.Y. Total - Bottom Ash  
71,620 C.Y.  
Fly Ash  
644,580 C.Y.
  
- C. TCLP Analysis is submitted for both fly ash and bottom ash.

- D. Generation: Mr. Quinn Morrison  
Roanoke Valley Energy  
P.O. Box 351  
Railroad Street  
Weldon, North Carolina 27890  
{252} 536-3200
- E. Engineer E. B. Grant, Jr. P.E.  
The Plumblin Corporation P.A.  
Engineering and Land Surveying  
121 Washington Avenue  
Weldon, N.C. 27890  
{252} 536-0203
- F. Layout showing the physical location of Roanoke Valley Energy is attached. Construction plans are attached showing revisions required by Division of Land Resources.
- G. J.S. Wommack is the owner of the site and I hereby acknowledge and consent to the use of coal combustion by-products as structural fill. I agree to record with the Register of Deeds of Halifax County the statement in accordance with Rule .1707 and in form perscribed by G.S. 47-38 through G.S. 47-43.

Sincerely



Job S. Wommack  
President Wommack & Sons, Inc.

Copy to: E. B. Grant  
Q. Morrison  
B. Noble  
B. Holden  
M. Estrada

1. NC DENR - LETTER REQUEST SINGLE PROJECT

2. COPY . LETTER OF NOTIFICATION

3. TCLP 3/27/2001

4. DATE OF APPLICATION TO EROSION CONTROL

5. APPROVED PLAN 3/9/2000



NORTH CAROLINA DEPARTMENT OF  
ENVIRONMENT AND NATURAL RESOURCES

DIVISION OF WASTE MANAGEMENT

August 9, 2000

JAMES B. HUNT JR.  
GOVERNOR

BILL HOLMAN  
SECRETARY

WILLIAM L. MEYER  
DIRECTOR

Mr. E. B. Grant, Jr. P.E.  
The Plumblin Corporation P.A.  
Engineering and Land Surveying  
121 Washington Avenue  
Weldon, NC 27890

Subj.: Coal Ash Structural Fill at the Wommack and Sons Property Saw Mill  
Lumber Drying Yard.

Dear Mr Grant:

As you know, the subject structural fill construction was interrupted by hurricane Floyd last fall and in fact you have indicated that the site experienced flooding. Did any of the ash leave the site during this flooding? According to a note in our files, this occurred when the initial project was approximately 80% complete. Subsequently, you submitted a notification for a revision to the initial project. This specifies changing the slope of the sides on this drying area from (4 to 1) to (3 to 1) (horizontal to vertical) and states that an additional eleven feet of ash is to be added on top of the fill already in place.

We are finding that attempts to summarize projects without closure statements and recordation documentation at each stage or phase of construction end up with incomplete and inaccurate summaries. When you and I were talking last week, you mentioned that you were going to issue notification about still another stage in this project. The purpose of this letter is to alert you to the problem we are having with such phased projects. We are asking that you change the notification paper work on these three separate phases into what is essentially a combined, single project. We will then trash the paper work that has been generated up to this time in this file and anticipate one closure statement and one recordation event which includes all of the combined ash utilized in all of the fill activit(ies) at the site .

You will need to rewrite the narrative(s), perhaps rename and renumber some drawings, perhaps creating additional narrative(s) in order to describe the project construction accurately including in some cases the quantities of ash actually used in some of the fill phases. A good example of the problem in this drying yard project is the initial notification. This will not be completed. Instead, the forementioned "Revision" will place additional ash (eleven feet) on top of a



E. B. Grant  
August 9, 2000  
Page 2

partially finished initial fill. Questions arise as to how much ash is being applied on the property, where on the property, how much fly ash, how much bottom ash, what is the projected completion date, etc.? How much TOTAL ash is to be (or has been) applied. The goal is to provide accurate ash usage history which will then allow making the closure statement and the deed recordation accurate.

Rule .1703(a)(1) specifies that the name of the U.S. Geological Survey seven and one-half minute map where the project is located be given or an eight and one-half inch topographic map showing the project location {be supplied}. This requirement has not been met in the material received to date and this needs to be accomplished. Additionally, these projects (initial and revision) already span three years of time. Rule .1703(a)(4) specifies that a TCLP analysis shall be conducted at least annually. This is normally being routinely done by the generator and the data should be available from him. Although the rule does not specifically state that this update data be submitted to the DSW, please submit it once you have obtained it.

Please telephone me at 919-733-0692, extension 260 if you have questions about the contents of this letter.

Sincerely,



William R. Hocutt, Chemist  
Solid Waste Section

cc: Jim Coffey  
Jim Barber

c:\wp6doc\letter\Halifax-DryLmbr-Fill-08-00

**WOMMACK & SONS, INC.**  
**P.O. BOX 431**  
**514 MULBERRY STREET**  
**WELDON, NORTH CAROLINA 27890**

APRIL 30 2001

Mr. James Coffey  
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DEHNR  
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401 Oberlin Road, Suite 150  
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Railroad Street  
Weldon, North Carolina 27890  
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- E. Engineer E. B. Grant, Jr. P.E.  
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Sincerely



Job S. Wommack  
President Wommack & Sons, Inc.

Copy to: E. B. Grant  
Q. Morrison  
B. Noble  
B. Holden  
M. Estrada

# CHAIN OF CUSTODY SAMPLE SUBMISSION RECORD

**HAWKMTN LABS INC.**

201 West Clay Avenue • West Hazleton, PA 182  
Phone: (717) 455-6011 • Fax: (717) 455-6321

LAB CLIENT NO. WESTMO  
LAB PROJECT NO. 3-103

REPORT TO: <u>Roanoke Valley Energy</u>	PROJECT NO.	DW DRINKING WATER    SL SLUDGE GW GROUND WATER    SO SOIL SW SURFACE WATER    HZ HAZARDOUS WW WASTE WATER    OL OIL
	PROJECT NAME <u>Rova</u>	

ATTN: <u>Fred Silva</u>	PHONE: <u>(252) 536-3200</u>	ANALYSES TO BE PERFORMED (Grid area with diagonal lines)
INVOICE TO: <u>PO Box 357 Weldon NC</u>		
<u>290 Power Place Rd Weldon NC</u>		

PURCHASE ORDER NO.	SAMPLE DESCRIPTION/LOCATION	DATE OF SAMPLING	TIME OF SAMPLING	SAMPLER (INITIALS)	TOTAL NO. CONTAINERS	SAMPLE TYPE	REMARKS:
	3-103-1 <u>Rova I Fly Ash</u>	<u>3/5</u>	<u>1:40</u>	<u>TEL</u>	<u>1</u>	<u>Ash X</u>	
	3-103-2 <u>Rova II Fly Ash</u>	<u>3/5</u>	<u>1:40</u>	<u>TEL</u>	<u>1</u>	<u>Ash X</u>	
	3-103-3 <u>Rova II Bottom Ash</u>	<u>3/5</u>	<u>1:40</u>	<u>TEL</u>	<u>1</u>	<u>Ash X</u>	
	3-103-4 <u>Rova I Bottom Ash</u>	<u>3/5</u>	<u>1:40</u>	<u>TEL</u>	<u>1</u>	<u>Ash X</u>	
	5						
	6						
	7						
	8						
	9						
	10						

REMARKS

RELINQUISHED BY: (SIGNATURE) <u>Timothy Cain</u>	DATE <u>3/5/01</u>	TIME <u>1:40</u>	RECEIVED BY: (SIGNATURE)	DATE	TIME
RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME
RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED FOR LABORATORY: (SIGNATURE) <u>Eric Rodriguez</u>	DATE <u>3-8-01</u>	TIME

## LABORATORY REPORT

TO: Westmoreland - LG&E Partners  
Roanoke Valley Energy Facility  
P.O. Box 351  
Weldon, NC 27890

Report Date: 3/27/01

Material Tested: Bottom Ash      HawkMtn #: 0103-00103-004  
Date Received: 3/08/2001      Sampler: Client  
Date Sampled: 3/05/2001      Sample pt. ID: ROVA I Bottom Ash  
Client ID: ROVA I Bottom Ash

TEST DESCRIPTION	TEST RESULT	UNITS	TEST METHOD	DATE
Toxicity Leachate Test				3/13,
TCLP, Extraction Fluid ID.	1	Fluid No.	EPA SW846 METH. 3010	3/13,
Leachate, Ending pH	5.01	su	EPA SW846 METH. 9040	3/13,
TCLP, Metals			EPA SW846	
Arsenic, Leachate	0.025	mg/l	EPA SW846 METH. 7060	3/23,
Barium, Leachate	0.69	mg/l	EPA SW846 METH. 7080	3/21,
Cadmium, Leachate	<0.005	mg/l	EPA SW846 METH. 7130	3/21,
Chromium, Leachate	<0.05	mg/l	EPA SW846 METH. 7190	3/19,
Lead, Leachate	<0.10	mg/l	EPA SW846 METH. 7420	3/21,
Mercury, Leachate	<0.2	ug/l	EPA SW846 METH. 7470	3/22,
Selenium, Leachate	0.006	mg/l	EPA SW846 METH. 7740	3/23,
Silver, Leachate	0.002	mg/l	EPA SW846 METH. 7760	3/23,
Copper, Leachate	0.03	mg/l	EPA SW846 METH. 7210	3/19,
Nickel, Total, leachate	0.08	mg/l	EPA SW846 METH. 7520	3/19,
Magnesium, Leachate	2.13	mg/l	EPA SW846 METH. 7450	3/21,
Zinc, Leachate	0.062	mg/l	EPA SW846 METH. 7950	3/21/

  
Jeffrey Gittleman, Lab Director

LABORATORY REPORT

TO: Westmoreland - LG&E Partners  
 Roanoke Valley Energy Facility  
 P.O. Box 351  
 Weldon, NC 27890

Report Date: 3/27/01

Material Tested:	Bottom Ash	HawkMtn #:	0103-00103-003
Date Received:	3/08/2001	Sampler:	Client
Date Sampled:	3/05/2001	Sample pt. ID:	ROVA II Bottom Ash
Client ID:	ROVA II Bottom Ash		

TEST DESCRIPTION	TEST RESULT	UNITS	TEST METHOD	DATE
Toxicity Leachate Test				3/13/C
TCLP, Extraction Fluid ID.	1	Fluid No.	EPA SW846 METH. 3010	3/13/C
Leachate, Ending pH	5.00	su	EPA SW846 METH. 9040	3/13/C
TCLP, Metals			EPA SW846	
Arsenic, Leachate	0.0168	mg/l	EPA SW846 METH. 7060	3/23/C
Barium, Leachate	0.26	mg/l	EPA SW846 METH. 7080	3/21/C
Cadmium, Leachate	<0.005	mg/l	EPA SW846 METH. 7130	3/21/C
Chromium, Leachate	<0.05	mg/l	EPA SW846 METH. 7190	3/19/C
Lead, Leachate	<0.10	mg/l	EPA SW846 METH. 7420	3/21/C
Mercury, Leachate	0.30	ug/l	EPA SW846 METH. 7470	3/22/C
Selenium, Leachate	0.014	mg/l	EPA SW846 METH. 7740	3/23/C
Silver, Leachate	0.001	mg/l	EPA SW846 METH. 7760	3/23/C
Copper, Leachate	0.05	mg/l	EPA SW846 METH. 7210	3/19/C
Nickel, Total, leachate	0.08	mg/l	EPA SW846 METH. 7520	3/19/C
Magnesium, Leachate	3.83	mg/l	EPA SW846 METH. 7450	3/21/C
Zinc, Leachate	0.052	mg/l	EPA SW846 METH. 7950	3/21/C

  
 Jeffrey Gittleman, Lab Director



L A B S I N C

201 West Clay Avenue / West Hazleton, PA 18201

PHONE (570) 455-6011 • FAX (570) 455-6321

LABORATORY REPORT

TO: Westmoreland - LG&E Partners
Roanoke Valley Energy Facility
P.O. Box 351
Weldon, NC 27890

Report Date: 3/27/01

Material Tested: Fly Ash HawkMtn #: 0103-00103-002
Date Received: 3/08/2001 Sampler: Client
Date Sampled: 3/05/2001 Sample pt. ID: ROVA II Fly Ash
Client ID: ROVA II Fly Ash

Table with 5 columns: TEST DESCRIPTION, TEST RESULT, UNITS, TEST METHOD, DATE. Rows include Toxicity Leachate Test, TCLP, Extraction Fluid ID, Leachate, Ending pH, TCLP, Metals, Arsenic, Leachate, Barium, Leachate, Cadmium, Leachate, Chromium, Leachate, Lead, Leachate, Mercury, Leachate, Selenium, Leachate, Silver, Leachate, Copper, Leachate, Nickel, Total, leachate, Magnesium, Leachate, Zinc, Leachate.

Handwritten signature of Jeffrey Gittleman, Lab Director



The Plumblin Corp. P.A.  
Engineering & Land Surveying  
121 Washington Avenue  
WELDON, N.C. 27890  
(919) 536-0203

E. B. GRANT, JR. P.E.  
Registered Professional Engineer  
N. C. No. 4402  
Registered Land Surveyor  
N. C. No. L-1592

APRIL 30 2001

TO WHOM IT MAY CONCERN;

THE REVISED EROSION CONTROL PLAN  
WAS SUBMITTED MARCH 29 2001.

MR. HOLLY INFORMS ME THAT THE  
APPROVED REVISION IS IN THE WORKS.

AS SOON AS RECEIVED I WILL FORWARD  
THE APPROVAL.

PLEASE NOTE THAT 15 DAYS HAS LAPSED  
SO ALSO PLAN MAY BE DEEMED  
APPROVED.

SINCERELY



**U.S. Postal Service**  
**RETURN RECEIPT FOR MERCHANDISE**  
*(Domestic Mail Only; No Insurance Coverage Provided)*

8099 3400 0000 8214 4002

Article Sent To:

Postage	\$ 3.95
Return Receipt for Merchandise Fee (Endorsement Required)	2.35
Special Handling Fee	
<b>Total Postage &amp; Fees</b>	<b>\$ 6.30</b>



Waiver of Signature  YES  NO

Name (Please Print Clearly) (to be completed by mailer)  
 John Holly SR.  
 Street, Apt. No. or P.O. Box No.  
 1628 Mail Service Center  
 City, State, ZIP+4  
 Raleigh NC 27699

PS Form 3811, July 1993 See Reverse for Instructions

Is your RETURN ADDRESS completed on the reverse side?

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1.  Addressee's Address
- 2.  Restricted Delivery

3. Article Addressed to:  
 Mr. John L. Holly Jr PEACAC  
 Regional Engineer  
 Road Quality Section  
 N.C. Dept of Environment & Natural Resources  
 3800 Barrett Dr.  
 1628 Mail Service Center  
 Raleigh NC 27699-1628

4a. Article Number  
 8099 3400 0000 8214 4002

4b. Service Type

<input type="checkbox"/> Registered	<input type="checkbox"/> Certified
<input type="checkbox"/> Express Mail	<input type="checkbox"/> Insured
<input type="checkbox"/> Return Receipt for Merchandise	<input type="checkbox"/> COD

7. Date of Delivery  
 3/29/01

5. Received By: (Print Name)

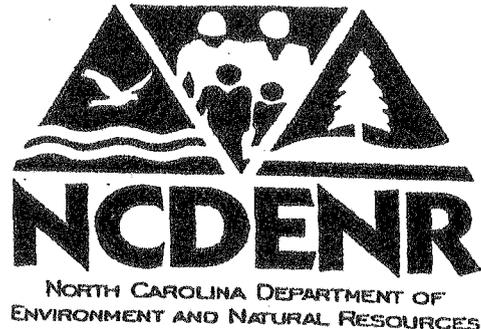
8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Addressee or Agent)

Thank you for using Return Receipt Service.

State of North Carolina  
Department of Environment  
and Natural Resources  
Raleigh Regional Office

James B. Hunt, Jr., Governor  
Bill Holman, Secretary



DIVISION OF LAND RESOURCES  
March 9, 2000

Wommack & Sons, Inc.  
121 Washington Ave.  
Weldon, N. C. 27870  
Attn: Job S. Wommack

RE: Letter of Receipt for Revised Plan  
Project Name: Wommack & Sons, Inc.  
Location: Halifax Co.  
Submitted by: The Plumline Corp.  
Date Received: 3-03-00  
Date Processing Initiated: 3-03-00  
Watershed: Roanoke # 2 / 03-02-08

Dear Mr. Wommack:

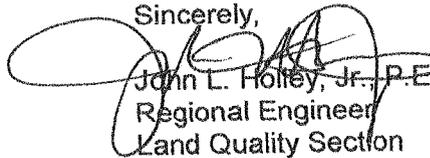
This office has received a Revised Erosion and Sedimentation Control Plan for the subject project as required by the Sedimentation Pollution Control Act of 1973 (Act).

This Act requires that the approving authority must approve or disapprove a revised plan within 15 days of receipt of a complete application (Date Processing Initiated). Failure of the approving authority to approve or disapprove the submitted plan within the 15 day period will be deemed approval of the plan.

\*\* Commencement or continuation of any land-disturbing activity under the jurisdiction of this Act prior to the approval of an erosion and sedimentation control plan is a violation of the Act.

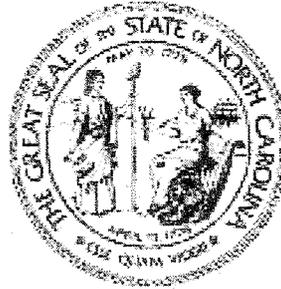
We will complete our review of the revised plan as soon as possible and will notify you concerning our findings. If you have any questions or need additional information please do not hesitate to contact this office at 919/571-4700. Your cooperation in this matter is appreciated.

Sincerely,

  
John L. Holley, Jr., P.E., CPESC  
Regional Engineer  
Land Quality Section  
Raleigh Regional Office

cc: E. B. Grant, Jr., The Plumline Corp.  
JLH/pjc

# CERTIFICATE OF PLAN APPROVAL



The posting of this certificate certifies that an erosion and sedimentation control plan has been approved for this project by the North Carolina Department of Environment and Natural Resources in accordance with North Carolina General Statute 113A - 57 (4) and 113A - 54 (d) (4) and North Carolina Administrative Code, Title 15A, Chapter 4B.0007 (c). This certificate must be posted at the primary entrance of the job site before construction begins and until establishment of permanent groundcover as required by North Carolina Administrative Code, Title 15A, Chapter 4B.0027 (b).

WOMMACK & SONS INC      HALIFAX COUNTY

**Project Name and Location**

**Date of Plan Approval**



**DIVISION OF LAND RESOURCES**

  
**Regional Engineer**  
**Land Quality Section**