11/9/91 DAN Brewer (SEME) best contact person

SWM Division .1700 Rules

- do not require permits for use of Coal combustion by products in structural fills. Require 30 day prior notification
- .1705 (j) specifies min. 12" cover, pg. 5, 2.5 second ¶ specifies 18" which is acceptable if top 6" OK for plants.
- Table 1. between pgs. 5 & 6 show TCLP for Spencer & Kannapolis Ashes. Table 1 shows erroneous 2L groundwater stds. As = .05 not 0.5 mg/l; Ba 2.0 not 10; Cd 0.005 not 0.1; Cr .05 not 0.5; Pb .015 not 0.5; Hg .0011 not .02; Se .05 not 0.1; Ag .018 not 0.5. Results even OK for unlined L.F., surely not haz. assuming det. limits were the SEME 2L stds.
- Coal Ash .1703(a)(4) requires generator certification that samples are representative, not included.
- SEME Report pg 5, 2.4 shows 360m Yd³ "capacity" in expansion, this certainly > 10m Yd³ coal ash Rule threshold.
- Other Reqmts. of .1703 not included are (a)(2)(a)(5), (a)(6)(C), (a)(6)(D), (a)(6)(E) Also note (a)(6)(F) that changes can trigger activity .1703 (a)(1) Purpose of project on pg. 21 Sect. 6.4
- is .1703 (b) stability analysis needed (OK done)?
- .1704 (a)(3) satisfied top of pg. 8

.1704 in toto satisfied in 4.1 top of pg. 10.

Also see pg. 15, 16 → .1705 (c) may not be satisfied by 4.2 pg. 20. "Thin" ≤ one foot?

- .1705 (h) compliance addressed in 4.6 pg. 13. 1988 not 1973. OK?

Pg. 17, next to last ¶, speaks of 1973 Act specified in Rules.

- .1705 (b) Spencer ash should be moisture conditioned; Pg. 19 seems to specify this only if dust is a problem with Spencer Ash.

Only "soil" TCLP data is current (9/91) Ash data is 1992 —

11/13, 11/14/95 With Jon McHargue

Purpose Pg. 21 Sect 6.4

20 yrs (Pg. 5 2.4)

360,000 Yd^3 Vol

1703 (a)

→ (4) TCLP current Letter by generators

(5) Owner Statement

(6) B C D E

1703 (b) Done

1704-4.1 Pg 10

Recording Pg. 22