

August 26, 1999

Mr. William Hocutt
State of North Carolina
Department of Environment and Natural Resources
Division of Solid Waste Management
P.O. Box 27687
Raleigh, North Carolina 27611-7687

Re: Englewood Baptist Church
Rocky Mount, North Carolina

Dear Mr. Hocutt:

In accordance with 15A NCAC 13B .1706 (d), this notice of completion is submitted for the Englewood Baptist Church coal combustion by-product structural fill project. I hereby certify that the subject project has been completed in accordance with all siting, design, construction, operation, closure, storage, and containment requirements of the Section .1700 Rules.

Sincerely,


Robert J. Waldrop
Vice President, HR, EH&S

North Carolina PE 10682



NORTH CAROLINA DEPARTMENT OF
ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT

September 7, 1999

Mr. Robert J. Waldrop
ReUse Technology Inc.
100 Christain Center Blvd., Suite 155
Kennesaw, Georgia 30144-5510

Subject: Englewood Baptist Church Coal Ash Structural Fill at Winstead
and Sunset Avenues in Rocky Mount (Nash County), NC. Closure
and Recordation Requirements.

Dear Mr. Waldrop:

We appreciate receiving your August 26, 1999 Notice of Completion and Closure on the subject project. This letter acknowledges receipt of your notice and also provides us with the opportunity to remind you that the recordation as specified in Rules .1700(a) through .1700(d) needs to now be completed by the property owner(s).

Please note that the recordation includes filing a statement of the volumes and location(s) of the ash on the property. The original notarized statement with the Register's seal and the date, book and page number of recording shall be returned <forwarded> to the Division after recording. Thank you for your attention to this matter.

Sincerely,

William R. Hocutt

William R. Hocutt, Chemist
Solid waste Section

cc: Jim Coffey
Terry Dover
Ben Barnes

c:wp6doc/letter/reuse09.99

FROM:

TO:

ReUse Technology, Inc.

PERMITTING • DISPOSAL PLANNING • REUSE

Post-It Fax Note	7671	Date	# of pages 1
To: <i>Terry Dover</i>		From: <i>Laura Seibert</i>	
Co./Dept.		Co.	
Phone #		Phone #	
Fax #		Fax #	

September 15, 1994

Mr. William Meyer
 State of North Carolina
 Department of Environment, Health, and Natural Resources
 Division of Solid Waste Management
 P.O. Box 27687
 401 Oberlin Building
 Raleigh, North Carolina 27611-7687

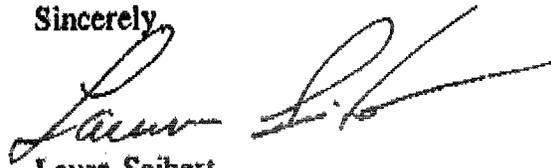
Dear Mr. Meyer:

On August 22, 1994, we submitted written notice of a coal combustion by-product structural fill project located approximately one mile south of the intersection of Winstead Avenue (SR 1613) and Sunset Avenue towards Bethlehem Road (SR 1714).

Under section .1703 (2) the start date was incorrectly stated as August 29, 1994. The correct date should be September 23, 1994. There will be no ash placed on site until after the estimated start date of September 23, 1994. I am sorry for any inconvenience this may have caused.

If you have any questions or comments, please feel free to call me at (404) 425-7676.

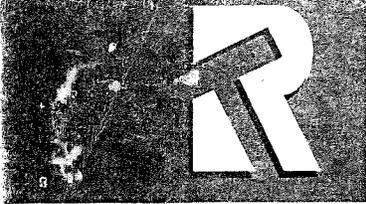
Sincerely,



Laura Seibert
 Environmental Specialist

LS/cmm
 cc: Terry Dover

WILLMEYER.LTR
 FILE 501.4.030.6.1



Deft

ReUse Technology, Inc.

PERMITTING • DISPOSAL PLANNING • REUSE

August 22, 1994



Mr. William Meyer
State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687
401 Oberlin Building
Raleigh, North Carolina 27611-7687

Dear Mr. Meyer:

In accordance with Rule .1703 of 15A NCAC 13B, we are submitting written notice of a coal combustion by-product structural fill project. The details of the project are as follows:

.1703 (1)

Coal combustion by-products will be used as structural fill to construct building pads. The project will be located approximately one mile south of the intersection of Winstead Avenue and Sunset Avenue towards Bethlehem Road in Rocky Mount. The attached 8 1/2 inch by 11 inch topographic map is marked to show the project location. This topographic map comes from the Rocky Mount 7 1/2 minute USGS map.

.1703 (2)

The estimated start date is August 29, 1994. The estimated completion date is February 22, 1996.

.1703 (3)

Approximately 8000 cubic yards of coal combustion by-products will be used in the project.

.1703 (4)

Coal combustion by-products will be utilized from the Cogentrix facilities located in Rocky Mount and Kenansville, North Carolina. A representative TCLP analysis from each of these facilities is attached.

.1703 (5)

The property owner's statement is attached.



Mr. William Meyer
August 22, 1994
Page 2

.1703 (6)

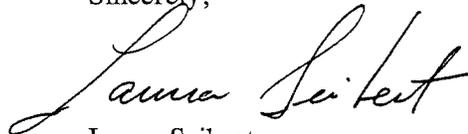
The coal combustion by-product generators are as follows:

Cogentrix of Rocky Mount, Inc.
P.O. Box 370
Route 2
State Road 1400
Battleboro, North Carolina 27809
Contact: Mark Casper
Phone: (704) 525-3800

Cogentrix Eastern Carolina Corporation
P.O. Box 806
Route 11 North
Kenansville, North Carolina 28349-0806
Contact: Mark Casper
Phone: (704) 525-3800

If there are any questions concerning this notice, please call me at (404) 425-7676.

Sincerely,



Laura Seibert
Environmental Specialist

LS/cmm
Attachment
By Federal Express
cc/att: Mark Casper
Bob Waldrop

ReUse Technology, Inc.
 100 Chastain Center Blvd.
 Suite 155
 Kennesaw, Ga. 30144
 Attn: Laura Seibert

3/24/94

The following analytical results have been obtained for the indicated samples which were submitted to this laboratory.

Project Account Code: RT001
 Location Code: Bob
 Location Description: Rocky Mount Flyash
 Laboratory Submittal Date: 1/10/94
 Laboratory Batch #: 1832

Parameter	Detection Level (mg/L)	Flyash RT06980
TCLP Metals:		
Arsenic	✓ 0.025	nd
Barium	✓ 0.5	nd
Cadmium	✓ 0.010	nd
Chromium	✓ 0.03	nd
Mercury	✓ 0.0005	nd
Lead	✓ 0.025	✓ 0.047
Selenium	✓ 0.025	nd
Silver	✓ 0.03	nd
pH		✓ 6.29

If there are any questions regarding this data, please call.

I hereby certify that this TCLP analysis is representative of the coal combustion by-products from the Cogentrix cogeneration facility located in Rocky Mount, North Carolina.

Mark A. Casper
 Signature

Sincerely,

Marc Lavelle

Marc Lavelle
 Assistant Lab Manager

ReUse Technology
100 Chastain Center Blvd.
Suite 155
Kennesaw, Ga. 30144
Attn: Bob Waldrop

12/27/93

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory.

Project Account Code: RT001
Location Code: Bob
Location Description: Kenansville
Date Sampled: 7/9/93
Laboratory Submittal Date: 8/4/93
Laboratory Batch #: 1656C

Parameter	Detection Level (mg/L)	Kenansville FA-03 RT06477
TCLP Metals:		
Arsenic	✓ 0.025	* 0.504
Barium	✓ 0.50	nd
Cadmium	✓ 0.015	nd
Chromium	✓ 0.05	nd
Mercury	✓ 0.0005	nd
Lead	✓ 0.005	nd
Selenium	✓ 0.025	* 0.268
Silver	✓ 0.03	nd
pH		✓ 6.23

If there are any questions regarding this data, please call.

**OK For Listed L.F.*

I HEREBY CERTIFY THAT THIS TCLP ANALYSIS IS REPRESENTATIVE OF THE COAL COMBUSTION BY-PRODUCTS FROM THE COGENTRIX COGENERATION FACILITY LOCATED IN KENANSVILLE, NORTH CAROLINA

Mark A. Cooper
SIGNATURE

Sincerely,

Marc Lavelle

Marc Lavelle
Assistant Lab Manager

**COAL COMBUSTION BY-PRODUCT
STRUCTURAL FILL**

LANDOWNER'S STATEMENT OF CONSENT

As the owner (or owner's authorized representative) of land upon which ReUse Technology plans to construct a coal combustion by-product structural fill, I hereby acknowledge and consent to the use of coal combustion by-products as structural fill. If more than one thousand (1,000) cubic yards of coal combustion by-products are utilized on this property, I agree to file a statement of the volume and locations of the coal combustion by-products with the Register of Deeds in the county or counties where the property is located in accordance with the requirements of 15A NCAC 13B.1707.

Property Location: Approximately one mile south of the intersection
of Winstead Avenue SR 1613 and Sunset Avenue
south towards Bethlehem Road, SR 1714.

Name: Englewood Baptist Church, Inc.
Stephen M. Lewis, President

Signature: Stephen M. Lewis, President

Date: August 2, 1994



Information From
Rocky Mount Quadrangles

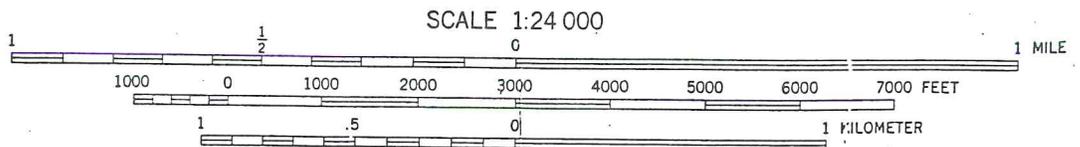


Figure 1-1
General Location Map
Englewood Baptist Church





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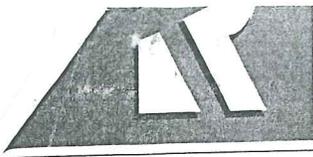
0041036586

4146M

0041036586

RECIPIENT'S COPY

From (Your Name) Please Print LAURA SEIBERT		Your Phone Number (Very Important) (404) 425-7678	To (Recipient's Name) Please Print WILLIAM MEYER		Recipient's Phone Number (Very Important) (919) 733-0692		
Company REUSE TECHNOLOGY		Department/Floor No.	Company NC DEPT OF ENVIRONMENT, HEALTH, & NATURAL RESOURCES - SOLID WASTE MGMT.		Department/Floor No.		
Street Address 100 CHASTAIN CTR PLVD STE 155			Exact Street Address (We Cannot Deliver to P.O. Boxes or P.O. Zip Codes.) 401 OBERLIN BUILDING				
City KENNESAW	State GA	ZIP Required 30144	City RALEIGH	State NC	ZIP Required 27611		
YOUR INTERNAL BILLING REFERENCE INFORMATION (optional) (First 24 characters will appear on invoice.) 300			IF HOLD AT FEDEX LOCATION, Print FEDEX Address Here Street Address				
PAYMENT 1 <input type="checkbox"/> Bill Sender 2 <input type="checkbox"/> Bill Recipient's FedEx Acct. No. 3 <input type="checkbox"/> Bill 3rd Party FedEx Acct. No. 4 <input type="checkbox"/> Bill Credit Card			City RALEIGH				
5 <input type="checkbox"/> Cash/Check			State NC				
4 SERVICES (Check only one box)		5 DELIVERY AND SPECIAL HANDLING (Check services required)		6 PACKAGES			
Priority Overnight (Delivery by next business morning) 11 <input type="checkbox"/> OTHER PACKAGING 16 <input checked="" type="checkbox"/> FEDEX LETTER* 12 <input type="checkbox"/> FEDEX PAK* 13 <input type="checkbox"/> FEDEX BOX 14 <input type="checkbox"/> FEDEX TUBE Economy Two-Day (Delivery by second business day) 30 <input type="checkbox"/> ECONOMY* *Economy Letter Rate not available. Minimum charge: One pound Economy rate. Freight Service (for packages over 150 lbs.) 70 <input type="checkbox"/> OVERNIGHT FREIGHT** (Confirmed reservation required) † Delivery commitment may be later in some areas.		Standard Overnight (Delivery by next business afternoon. No Saturday delivery) 51 <input type="checkbox"/> OTHER PACKAGING 56 <input type="checkbox"/> FEDEX LETTER* 52 <input type="checkbox"/> FEDEX PAK* 53 <input type="checkbox"/> FEDEX BOX 54 <input type="checkbox"/> FEDEX TUBE Government Overnight (Restricted for authorized users only) 46 <input type="checkbox"/> GOVT LETTER 41 <input type="checkbox"/> GOVT PACKAGE **Declared Value Limit \$500. **Call for delivery schedule.		Weekday Service 1 <input type="checkbox"/> HOLD AT FEDEX LOCATION WEEKDAY (Fill in Section H) 2 <input checked="" type="checkbox"/> DELIVER WEEKDAY Saturday Service 31 <input type="checkbox"/> HOLD AT FEDEX LOCATION SATURDAY (Fill in Section H) 3 <input type="checkbox"/> DELIVER SATURDAY (Extra charge) (Not available to all locations) 9 <input type="checkbox"/> SATURDAY PICK-UP (Extra charge) Special Handling 4 <input type="checkbox"/> DANGEROUS GOODS (Extra charge) 6 <input type="checkbox"/> DRY ICE (Dangerous Goods Shipper's Declaration not required) Dry Ice 9, UN 1845, _____ X _____ kg. 904 III _____ DESCRIPTION _____ 12 <input type="checkbox"/> HOLIDAY DELIVERY (if offered) (Extra charge)		YOUR DECLARED VALUE (See right) Emp. No. _____ Date _____ <input type="checkbox"/> Cash Received <input type="checkbox"/> Return Shipment <input type="checkbox"/> Third Party <input type="checkbox"/> Chg. To Del. <input type="checkbox"/> Chg. To Hold Street Address _____ City _____ State _____ Zip _____ Received By: X Date/Time Received _____ FedEx Employee Number _____ DIM SHIPMENT (Chargeable Weight) <input type="checkbox"/> _____ lbs. L x W x H Received At 1 <input type="checkbox"/> Regular Stop 3 <input checked="" type="checkbox"/> Drop Box 2 <input type="checkbox"/> On-Call Stop 4 <input type="checkbox"/> B.S.C. 5 <input type="checkbox"/> Station 7 Release Signature: _____	
			Federal Express Use				
			Base Charges				
			Declared Value Charge				
			Other 1				
			Other 2				
			Total Charges				
			REVISION DATE 3/94 PART #137204 FXEM 5/94 FORMAT #158 158 © 1992-93 FEDEX PRINTED IN U.S.A.				



ReUse Technology, Inc.

PERMITTING • DISPOSAL PLANNING • REUSE

Appian 972-1703

August 22, 1994



Mr. William Meyer
State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687
401 Oberlin Building
Raleigh, North Carolina 27611-7687

Bobby Dwyer owner
Appian

Dear Mr. Meyer:

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The property owner's statement is attached.

CORPORATE OFFICE

100 Chastain Center Boulevard • Suite 155 • Kennesaw, Georgia 30144 • Phone 404 425-7676 • Fax 404 425-7681



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Mr. William Meyer
August 22, 1994
Page 2

.1703 (6)

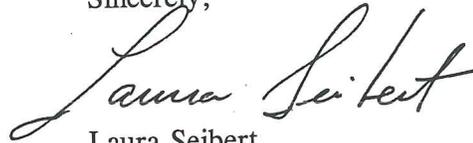
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P.O. Box 370
Route 2
State Road 1400
Battleboro, North Carolina 27809
Contact: Mark Casper
Phone: (704) 525-3800

Cogentrix Eastern Carolina Corporation
P.O. Box 806
Route 11 North
Kenansville, North Carolina 28349-0806
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Phone: (704) 525-3800

If there are any questions concerning this notice, please call me at (404) 425-7676.

Sincerely,



Laura Seibert
Environmental Specialist

LS/cmm
Attachment
By Federal Express
cc/att: Mark Casper
Bob Waldrop

B:\LAURA\MEYER.LTR
FILE 301.8.020.6.1

Nash County Coal Ash Struct. Fill
ReUse Technology (Cancelled Project).
Aug. 24, 1994 Notification
Sept. 15, 1994 Changed Start Date
from 8/29/94 to 9/23/94.
Sept. 12, 1994 Letter of Acknowledgement
Dec. 23, 1994 ReUse started project ongoing
April 1999 " " " "
June 12, 1999 " " project CANCELLED
TERRY DOVER

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management



James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director

September 12, 1994

Ms. Laura Seibert
ReUse Technology, Inc.
100 Chastain Center Blvd. Suite 155
Kennesaw, Georgia 30144

The Division of Solid Waste Management, (the "Division"), has received your Notification of a coal combustion by-product (ash) structural fill to be located at Rocky Mount, Nash County, N.C. and proposed to commence August 29, 1994.

Please be aware that the size of a fill project is not a decisive factor in determining if the services of a NC licensed professional engineer (PE) is necessary on a coal ash structural fill. The Section 1700 Rules do specify that a proposed fill site which anticipates utilization of 10,000 Yd³ or more of ash must include a PE approved Construction Plan in the Notification. Regardless of the volume of coal ash used in a structural fill project, the Closure Rule, 15A N.C. Administrative Code 13B .1706, requires certification signed and sealed by a PE that all rules in Section .1700 have been met. These rules include, among other things, Rule 1704 (a)(4) certification that no coal ash has been placed within two feet of the seasonal high groundwater table and certification under Rule 1705 (c) that the coal ash has been placed uniformly and compacted in lifts not exceeding one foot in thickness, compacted to standards including in-situ density, compaction effort and relative density, specified by a PE for a specific end use purpose. Rule .1705 (c) engineering specifications must be designated before commencement of the fill. Moreover, a PE cannot certify that these rules have been met unless he or she has been involved in the project from the beginning and has made periodic inspections of the work in progress.

Analyses of groundwater samples collected from monitoring wells located at a North Carolina coal ash structural fill site indicate that the ash may have caused or contributed to violation of the 15A N.C. Administrative Code 2L Standards for arsenic, cadmium, chromium, lead, and selenium, as well as elevated sulfate levels. Based upon this information, the Solid Waste Division strongly recommends that you retain the services of a qualified hydrogeologic consulting firm to assist you in determining the vulnerability of the groundwater at the site based on site attenuation, waste extractability and end use to inhibit infiltration and consider installation of groundwater monitoring wells on vulnerable sites before commencing fill operations.

Copies of this letter are being sent to the Generators and Constructors, who are responsible for apprising the Owners of the land to be filled (if not the same party as the Generator/Constructor) of the Landowner's responsibility for groundwater contamination which may result from this coal ash structural fill.

Sincerely,


Dexter R. Matthews, Chief
Solid Waste Section

cc: Bill Hocutt, Solid Waste Section

Mark Casper
Cogentrix Eastern Carolina Corporation
P.O. Box 806
Rt. 11 North
Kenansville, NC 28349-0806

Mark Casper
Cogentrix of Rocky Mount, Inc.
P.O. Box 370
Rt. 2
State Road 1400
Battleboro, NC 27809

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management



James B. Hunt, Jr., Governor
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Solid Waste Section

cc: Bill Hocutt, Solid Waste Section

Mark Casper
Cogentrix Eastern Carolina Corporation
P.O. Box 806
Rt. 11 North
Kenansville, NC 28349-0806

Mark Casper
Cogentrix of Rocky Mount, Inc.
P.O. Box 370
Rt. 2
State Road 1400
Battleboro, NC 27809

**COAL COMBUSTION BY-PRODUCT
STRUCTURAL FILL**

LANDOWNER'S STATEMENT OF CONSENT

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Property Location: Approximately one mile south of the intersection
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Name: Englewood Baptist Church, Inc.
Stephen M. Lewis, President

Signature: Stephen M. Lewis, President

Date: August 2, 1994



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Rocky Mount Quadrangles

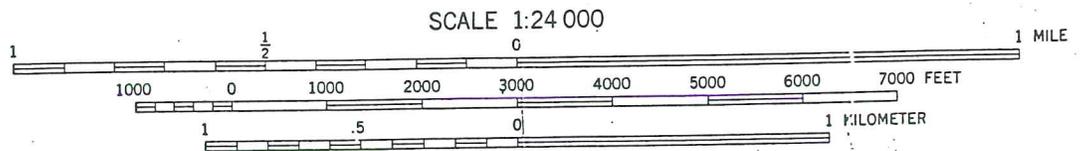
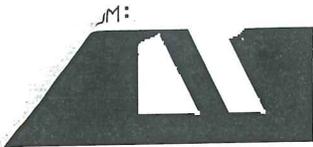


Figure 1-1
General Location Map
Englewood Baptist Church





ReUse Technology, Inc.

PERMITTING • DISPOSAL PLANNING • REUSE

September 15, 1994

Mr. William Meyer
State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687
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Raleigh, North Carolina 27611-7687

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If you have any questions or comments, please feel free to call me at (404) 425-7676.

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Environmental Specialist

LS/cmm
cc: Terry Dover

B:\LSM\HYFR2.LTR
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CORPORATE OFFICE

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ReUse Technology, Inc.

PERMITTING • DISPOSAL PLANNING • REUSE

Deft

August 22, 1994



Mr. William Meyer
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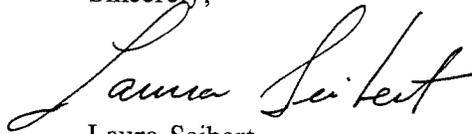
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Laura Seibert
Environmental Specialist

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cc/att: Mark Casper
Bob Waldrop

State of North Carolina
Department of Environment,
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September 12, 1994

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Kennesaw, Georgia 30144

The Division of Solid Waste Management, (the "Division"), has received your Notification of a coal combustion by-product (ash) structural fill to be located at Rocky Mount, Nash County, N.C. and proposed to commence August 29, 1994.

Please be aware that the size of a fill project is not a decisive factor in determining if the services of a NC licensed professional engineer (PE) is necessary on a coal ash structural fill. The Section 1700 Rules do specify that a proposed fill site which anticipates utilization of 10,000 Yd³ or more of ash must include a PE approved Construction Plan in the Notification. Regardless of the volume of coal ash used in a structural fill project, the Closure Rule, 15A N.C. Administrative Code 13B .1706, requires certification signed and sealed by a PE that all rules in Section .1700 have been met. These rules include, among other things, Rule 1704 (a)(4) certification that no coal ash has been placed within two feet of the seasonal high groundwater table and certification under Rule 1705 (c) that the coal ash has been placed uniformly and compacted in lifts not exceeding one foot in thickness, compacted to standards including in-situ density, compaction effort and relative density, specified by a PE for a specific end use purpose. Rule .1705 (c) engineering specifications must be designated before commencement of the fill. Moreover, a PE cannot certify that these rules have been met unless he or she has been involved in the project from the beginning and has made periodic inspections of the work in progress.

Analyses of groundwater samples collected from monitoring wells located at a North Carolina coal ash structural fill site indicate that the ash may have caused or contributed to violation of the 15A N.C. Administrative Code 2L Standards for arsenic, cadmium, chromium, lead, and selenium, as well as elevated sulfate levels. Based upon this information, the Solid Waste Division strongly recommends that you retain the services of a qualified hydrogeologic consulting firm to assist you in determining the vulnerability of the groundwater at the site based on site attenuation, waste extractability and end use to inhibit infiltration and consider installation of groundwater monitoring wells on vulnerable sites before commencing fill operations.

Copies of this letter are being sent to the Generators and Constructors, who are responsible for apprising the Owners of the land to be filled (if not the same party as the Generator/Constructor) of the Landowner's responsibility for groundwater contamination which may result from this coal ash structural fill.

Sincerely,


Dexter R. Matthews, Chief
Solid Waste Section

cc: Bill Hocutt, Solid Waste Section

Mark Casper
Cogentrix Eastern Carolina Corporation
P.O. Box 806
Rt. 11 North
Kenansville, NC 28349-0806

Mark Casper
Cogentrix of Rocky Mount, Inc.
P.O. Box 370
Rt. 2
State Road 1400
Battleboro, NC 27809

9/13/94
Bob Waldrop was
called and told that
the letter of warning
was to be sent by
field people - 30 days
being violated. He (WRJ)
said date of 8/29 incorrect.

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director



January 7, 1997

Ms. Laura L. Seibert
ReUse Technology, Inc.
100 Chastain Center Boulevard, Suite 155
Kennesaw, Georgia 30144

Subject: Notification of a Coal Combustion By-Products Structural Fill in Nash County (Rocky Mount NC) Estimated to Begin January 14, 1997 and Anticipated to be Completed by February 14, 1998.

- References:
1. December 9, 1996 Notification Letter from Laura Seibert to William R. Hocutt Pertaining to a Coal Combustion By-Products Structural Fill in Rocky Mount, NC for Appian Engineering Consultants. The site is to be Located Approximately One Mile South of the Intersection of Winstead Avenue and Sunset Avenue, Towards Bethlehem Road.
 2. December 23, 1996 Addendum Letter from Laura Seibert to William R. Hocutt on Reference # 1 Notification Letter.

Dear Ms. Seibert:

We are in receipt of your reference December 9, 1996 Notification and the December 23, 1996 addendum letter. Combined, these satisfy the Notification requirements set forth in the Solid Waste Management Rules 15 A NCAC 13B Section .1700 concerning beneficial use of coal combustion by-products. The revised map included in your addendum letter is satisfactory and the dates furnished on data submitted in your notification shows those data to be less than one year old and therefore adequate for our use.

Please be aware that analysis of groundwater samples collected from monitoring wells located at a North Carolina coal ash structural fill site revealed that levels of sulfate and arsenic were elevated above the background well values and exceeded the 15A NCAC 2L Standards. It was later found that **the ash had been placed in the ground water at this site** and the ash has been subsequently removed. The Division of Waste Management strongly recommends that you retain the services of a qualified hydrogeologic consulting firm to assist you in determining the vulnerability of the groundwater at the site based on site attenuation, waste extractability and end use to inhibit infiltration. You can then consider installation of groundwater monitoring wells depending on vulnerability before commencing fill operations.

P.O. Box 27687,
Raleigh, North Carolina 27611-7687
Voice 919-733-4996

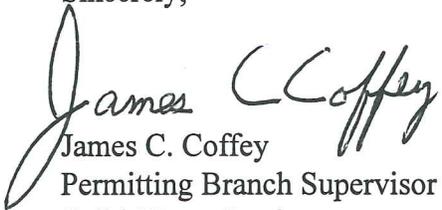


FAX 919-715-3605
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50% recycled/10% post-consumer paper

Laura Seibert
January 7, 1997
Page 2

Please contact me at 919-733-0692, extension 255 or Bill Hocutt at extension 260 if you have any questions about this.

Sincerely,


James C. Coffey
Permitting Branch Supervisor
Solid Waste Section

cc: Terry Dover
Ben Barnes
Bill Hocutt

c:\wp6doc\letter\Jim\sebrt-01.97

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director



January 7, 1997

Ms. Laura L. Seibert
ReUse Technology, Inc.
100 Chastain Center Boulevard, Suite 155
Kennesaw, Georgia 30144

Subject: Notification of a Coal Combustion By-Products Structural Fill in Nash County (Rocky Mount NC) Estimated to Begin January 14, 1997 and Anticipated to be Completed by February 14, 1998.

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P.O. Box 27687,
Raleigh, North Carolina 27611-7687
Voice 919-733-4996

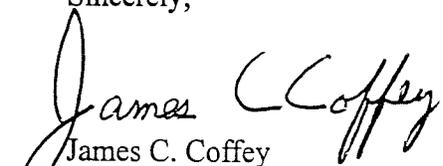


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Laura Seibert
January 7, 1997
Page 2

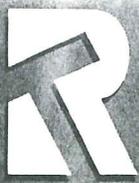
Please contact me at 919-733-0692, extension 255 or Bill Hocutt at extension 260 if you have any questions about this.

Sincerely,


James C. Coffey
Permitting Branch Supervisor
Solid Waste Section

cc: Terry Dover
Ben Barnes
Bill Hocutt

c:wp6doc/letter/Jim/sebrt-01.97



ReUse Technology, Inc.

PERMITTING • DISPOSAL PLANNING • REUSE

December 23, 1996

Mr. William R. Hocutt
State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687
401 Oberlin Building
Raleigh, North Carolina 27611-7687

Dear Mr. Hocutt:

Per our conversation on 12/17/96, I am enclosing a revised map showing the vicinity of the Appian property. The address is approximately one mile south of the intersection of Winstead and Sunset Avenues, South towards Bethlehem Road in Rocky Mount N. C..

Also enclosed, is verification that the original TCLP submitted meets the annual requirements of .1703(a)(4).

After I received your fax I reviewed the .1700 requirements concerning; The reporting of closure dates, and The recordation processes. In Section .1702 - General Provisions . . . it states:

“The provisions of this Section shall apply to the siting, design, construction, operation, closure and recordation of projects”... “to structural fills other than those which received written approval from the Division prior to the effective date of this Section.” (January 4, 1994)

Since section .1702 covers the majority of ReUse projects listed, closure reporting is not applicable to those projects. All other ReUse jobs that fall after the effective date, have been reported, or are not applicable for reasons listed below.

- | | | |
|-----|--|----------|
| (1) | Nash: Winstead & Sunset Aves (Rocky Mount)
Englewood Baptist Church | Ongoing |
| (2) | Nash: TurnKey Contractors
Wright Dev. Co. | Ongoing |
| (3) | Duplin: Howard Farms
Louis Howard | Canceled |

Concerning the recordation requirement process, Sections .1703 - Notification of . . . , and .1707 - Recordation of Structural Fill Facilities states:



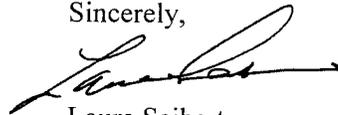
December 23, 1996
Page 2

.1703 (a)(5): "...the owner... agrees to record the fill in accordance with Rule .1707 of this Section."

.1707 (a): "the owner of the land... shall file a statement with the Register Of Deeds..."

As this reads, "the owner of land" is responsible for all recordation procedures on structural fill projects. To my knowledge ReUse has complied with all closure and recordation reporting requirements to this date. If you have any questions, please call me at (770)- 425-7676.

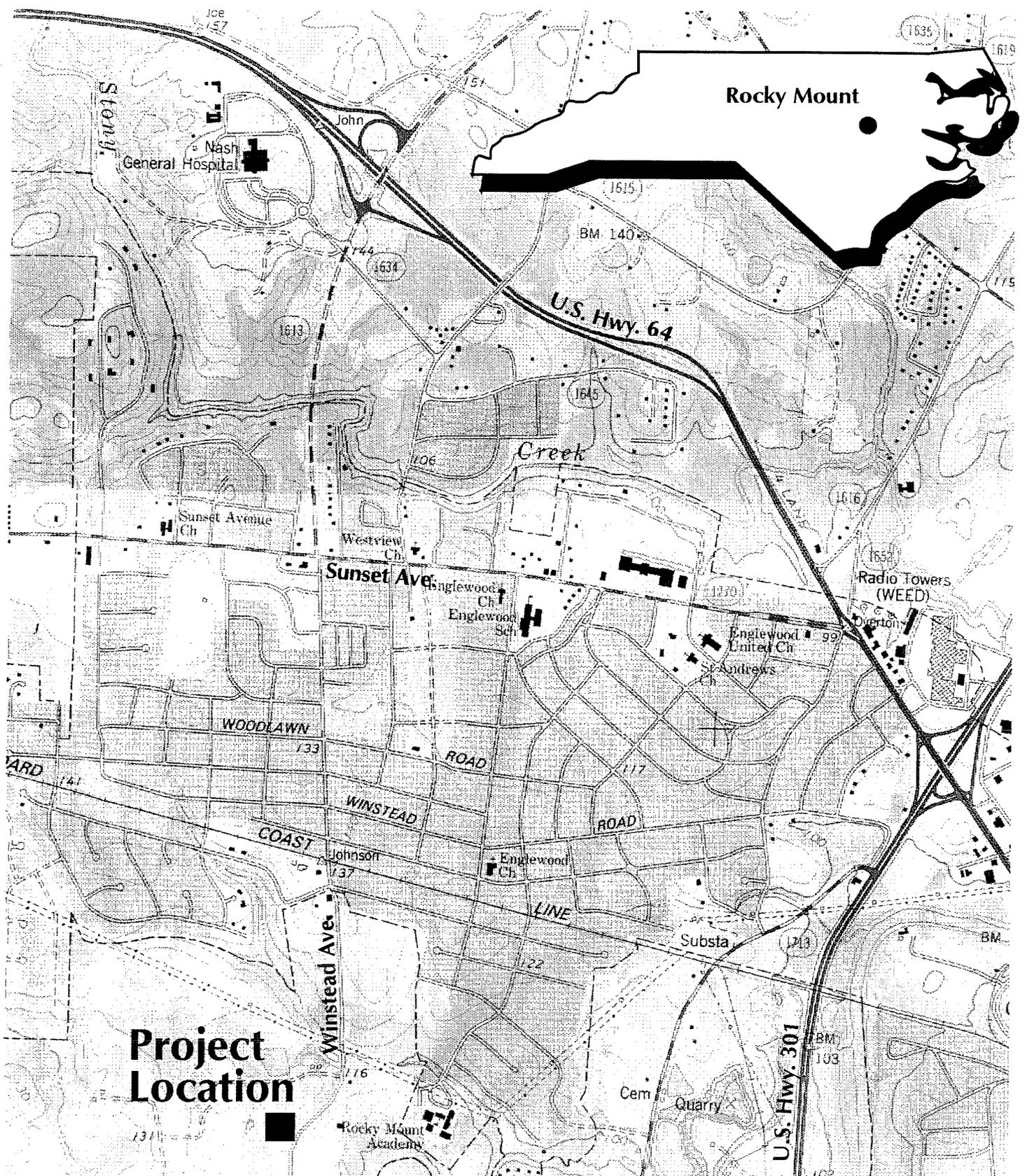
Sincerely,



Laura Seibert
Environmental Specialist

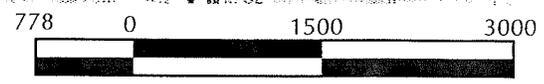
LLS
Enclosures

cc/enc.: Bob Waldrop



Project Location

APPIAN PROPERTY
Winstead Avenue



Scale; 1" = 1500'



FIGURE 1-1
GENERAL LOCATION MAP

Information interpolated from 7.5 minute series, USGS Quadrangle, Rocky Mount, (1977) and NCDOT County Roadway Map, Nash County, (1988)

New Technology Development

A Division of ReUse Technology, Inc.

ReUse Technology, Inc.
100 Chastain Center Blvd.
Suite 155
Kennesaw, Ga. 30144
Attn: Bob Waldrop

2/26/96

The following analytical results have been obtained for the indicated samples which were submitted to this laboratory.

Project Account Code: RT001
Location Code: Bob
Location Description: High Carbon Flyash
Laboratory Batch #: 2214
Submittal Date: 2/9/96

Parameter	E'town FA RT09208	K'ville FA RT09209	L'ton FA RT09210
TCLP Metals (mg/L):			
Arsenic	0.220	1.83	0.278
Barium	<0.50	<0.50	<0.50
Cadmium	0.025	0.023	0.032
Chromium	<0.050	<0.050	<0.050
Lead	0.016	<0.015	0.022
Mercury	<0.0005	<0.0005	<0.0005
Selenium	0.054	0.167	0.084
Silver	<0.025	<0.025	<0.025
pH	5.82	6.22	5.25

If there are any questions regarding this data, please call.

Sincerely,

Marc Lavelle
Lab Manager



ReUse Technology, Inc.

...progress today, with respect for tomorrow.

December 9, 1996

Mr. William R. Hocutt
State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687
401 Oberlin Building
Raleigh, North Carolina 27611-7687

RE: Appian Engineering Consultants
Rocky Mount, North Carolina

Dear Mr. Hocutt:

In accordance with Rule .1703 of 15A NCAC 13B, we are submitting written notice of a coal combustion by-product structural fill project. The details of the project are as follows:

.1703 (1)

Coal combustion by-products will be used as structural fill to construct building pads. The project will be located approximately one mile south of the intersection of Winstead Avenue and Sunset Avenue towards Bethlehem Road in Rocky Mount. The attached 8 1/2 inch by 11 inch topographic map is marked to show the project location. This topographic map comes from the Rocky Mount 7 1/2 minute USGS map.

.1703 (2)

The estimated start date is January 14, 1997. The estimated completion date is February 14, 1998.

.1703 (3)

Approximately 8500 cubic yards of coal combustion by-products will be used in the project.

.1703 (4)

Coal combustion by-products will be utilized from the Cogentrix facilities located in Rocky Mount, Lumberton, Elizabethtown, and Kenansville, North Carolina. A representative TCLP analysis from each of these facilities is attached.

.1703 (5)

The property owner's statement is attached.

Mr. William R. Hocutt
December 9, 1997
Page 2

.1703 (6)

The coal combustion by-product generators are as follows:

Cogentrix of Rocky Mount, Inc.
P.O. Box 370
Route 2
State Road 1400
Battleboro, North Carolina 27809
Contact: Mark Casper
Phone: (704) 525-3800

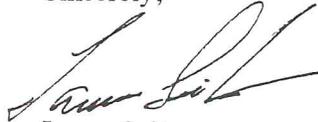
Cogentrix Eastern Carolina Corp.
State Road 2202/Hestertown Road
P.O. Box 1063
Lumberton, NC 28359-1063
Contact: Mark Casper
Phone: (704) 525-3800

Cogentrix Eastern Carolina Corporation
P.O. Box 806
Route 11 North
Kenansville, North Carolina 28349-0806
Contact: Mark Casper
Phone: (704) 525-3800

Cogentrix Eastern Carolina Corp.
N.C. Highway 87
P.O. Box 1848
Elizabethtown, NC 28337
Contact: Mark Casper
Phone: (704) 525-3800

In addition to the notification requirements of Section.1703(a), ReUse Technology, Inc. is fully aware and will comply with the seven setback requirements of Section.1704(a) as applicable. If there are any questions concerning this notice, please call me at (770) 425-7676.

Sincerely,



Laura Seibert
Environmental Specialist

LS/jt
Attachment
By Federal Express

cc/att: Mark Casper
Bob Waldrop
Mark Stocks

Order # A6-01-138
02/11/96 09:41

Page 3

TEST RESULTS BY SAMPLE

Sample Description: ROCKY MOUNT MC-BOTTOM ASH Lab No: 01A
Test Description: TCLP METALS Method: 6010/7000 Test Code: TCLP_M
Collected: 01/17/96

PARAMETER	RESULT	LIMIT
Arsenic	<u>BDL</u>	<u>0.05</u>
Barium	<u>0.36</u>	<u>0.01</u>
Cadmium	<u>BDL</u>	<u>0.01</u>
Chromium	<u>BDL</u>	<u>0.01</u>
Lead	<u>BDL</u>	<u>0.05</u>
Mercury	<u>BDL</u>	<u>0.005</u>
Selenium	<u>BDL</u>	<u>0.05</u>
Silver	<u>BDL</u>	<u>0.01</u>
PH		7.33

Notes and Definitions for this Report:

DATE RUN 02/09/96
ANALYST BB
UNITS mg/L

Sample Description: ROCKY MOUNT MC-FLY ASH Lab No: 02A
Test Description: TCLP METALS Method: 6010/7000 Test Code: TCLP_M
Collected: 01/17/96

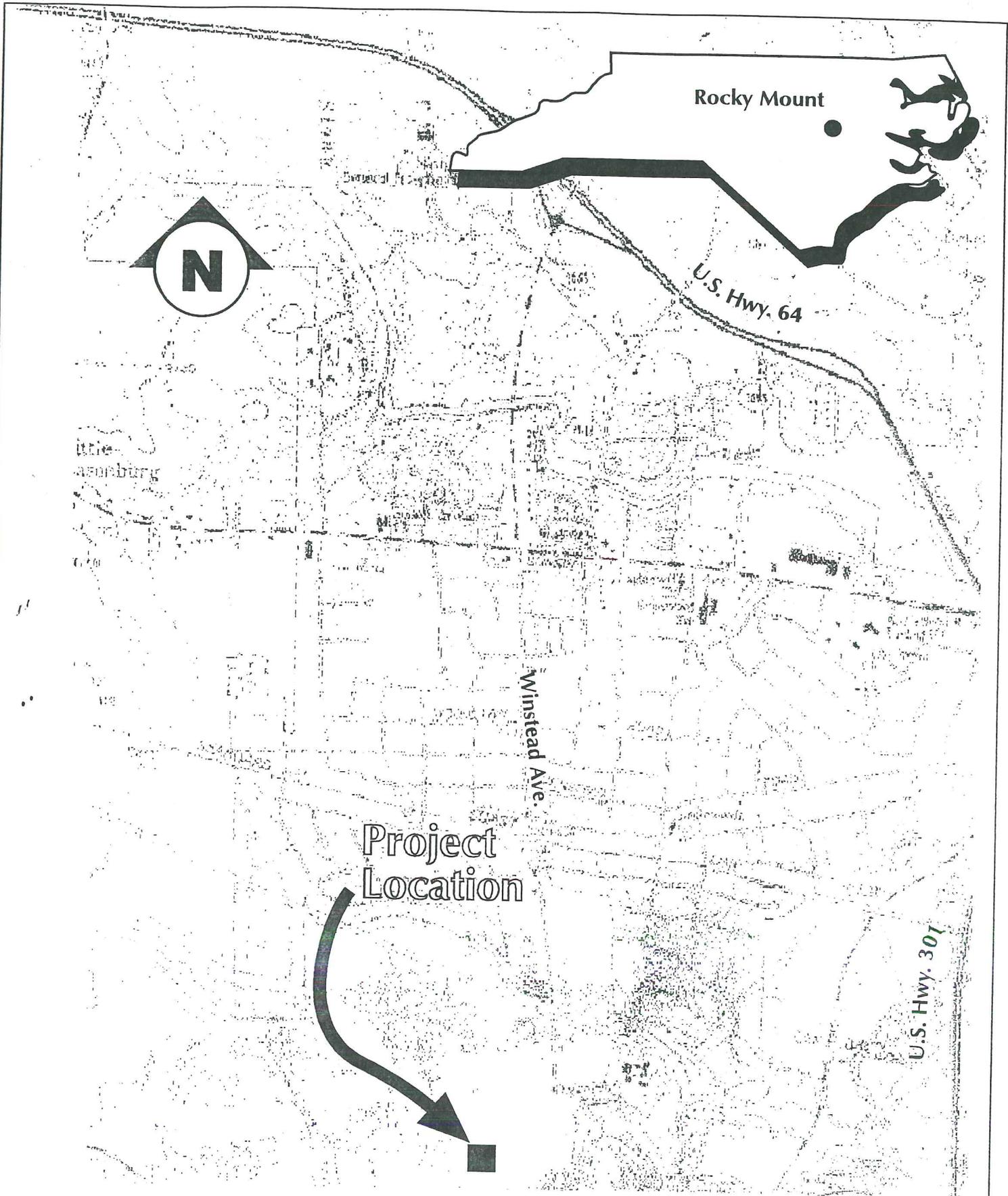
PARAMETER	RESULT	LIMIT
Arsenic	<u>BDL</u>	<u>0.05</u>
Barium	<u>0.40</u>	<u>0.01</u>
Cadmium	<u>BDL</u>	<u>0.01</u>
Chromium	<u>0.01</u>	<u>0.01</u>
Lead	<u>0.08</u>	<u>0.05</u>
Mercury	<u>BDL</u>	<u>0.005</u>
Selenium	<u>BDL</u>	<u>0.05</u>
Silver	<u>BDL</u>	<u>0.01</u>

Notes and Definitions for this Report:

DATE RUN 02/09/96
ANALYST BB
UNITS mg/L

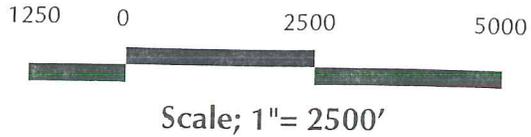
I HEREBY CERTIFY THAT THIS TCLP ANALYSIS IS REPRESENTATIVE OF THE COAL, COMBUSTION BY-PRODUCTS FROM THE COGENTRIX COGENERATION FACILITY LOCATED IN ROCKY MOUNT, NORTH CAROLINA.

Mark A. Casper
SIGNATURE



APPIAN PROPERTY

FIGURE 1-1
GENERAL LOCATION MAP



New Technology Development

A Division of ReUse Technology, Inc.

ReUse Technology, Inc.
100 Chastain Center Blvd.
Suite 155
Kennesaw, Ga. 30144
Attn: Bob Waldrop

2/26/96

The following analytical results have been obtained for the indicated samples which were submitted to this laboratory.

Project Account Code: RT001
Location Code: Bob
Location Description: High Carbon Flyash
Laboratory Batch #: 2214

Parameter	E'town FA RT09208	K'ville FA RT09209	L'ton FA RT09210
TCLP Metals (mg/L):			
Arsenic	0.220	1.83	0.278
Barium	<0.50	<0.50	<0.50
Cadmium	0.025	0.023	0.032
Chromium	<0.050	<0.050	<0.050
Lead	0.016	<0.015	0.022
Mercury	<0.0005	<0.0005	<0.0005
Selenium	0.054	0.167	0.084
Silver	<0.025	<0.025	<0.025
pH	5.82	6.22	5.25

If there are any questions regarding this data, please call.

Sincerely,



Marc Lavelle
Lab Manager

I HEREBY CERTIFY THAT THIS TCLP ANALYSIS IS REPRESENTATIVE OF THE COAL COMBUSTION BY-PRODUCTS FROM THE COGENTRIX COGENERATION FACILITY LOCATED IN ELEZABETHTOWN, KENANSVILLE, AND LUMBERTON, NORTH CAROLINA.


SIGNATURE

COAL COMBUSTION BY-PRODUCT STRUCTURAL FILL

LANDOWNER'S STATEMENT OF CONSENT

As the owner (or owner's authorized representative) of land upon which ReUse Technology, Inc. plans to construct a coal combustion by-product structural fill, I hereby acknowledge and consent to the use of coal combustion by-products as structural fill upon such property. If more than one thousand (1,000) cubic yards of coal combustion by-products are utilized on this property, I agree to file a statement of the volume and locations of the coal combustion by-products with the Register of Deeds in the county or counties where the property is located in accordance with the requirements of 15A NCAC 13B .1707.

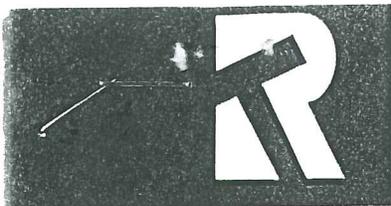
Property Location: APPROXIMATELY ONE MILE SOUTH OF THE INTERSECTION
OF WINSTEAD AVENUE SR 1613 AND SUNSET AVENUE
SOUTH TOWARDS BETHLEHEM ROAD, SR 1714.

Name: Bobby L. Joyner → Owner of Appian

Signature: *Bobby L. Joyner*

Date: 12.6.96

RECEIVED
DEC 11 1996
REUSE TECHNOLOGY, INC.



ReUse Technology, Inc.

PERMITTING • DISPOSAL PLANNING • REUSE

December 23, 1996

Mr. William R. Hocutt
State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687
401 Oberlin Building
Raleigh, North Carolina 27611-7687

Dear Mr. Hocutt:

Per our conversation on 12/17/96, I am enclosing a revised map showing the vicinity of the Appian property. The address is approximately one mile south of the intersection of Winstead and Sunset Avenues, South towards Bethlehem Road in Rocky Mount N. C.. Also enclosed, is verification that the original TCLP submitted meets the annual requirements of .1703(a)(4).

After I received your fax I reviewed the .1700 requirements concerning; The reporting of closure dates, and The recordation processes. In Section .1702 - General Provisions . . . it states:

“The provisions of this Section shall apply to the siting, design, construction, operation, closure and recordation of projects”... “to structural fills other than those which received written approval from the Division prior to the effective date of this Section.” (January 4, 1994)

Since section .1702 covers the majority of ReUse projects listed, closure reporting is not applicable to those projects. All other ReUse jobs that fall after the effective date, have been reported, or are not applicable for reasons listed below.

(1) Nash: Winstead & Sunset Aves (Rocky Mount)
Englewood Baptist Church

Ongoing

(2) Nash: TurnKey Contractors
Wright Dev. Co.

Ongoing

(3) Duplin: Howard Farms
Louis Howard

Canceled

Concerning the recordation requirement process, Sections .1703 - Notification of . . . , and .1707 - Recordation of Structural Fill Facilities states:



December 23, 1996

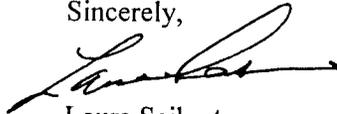
Page 2

.1703 (a)(5): "...the owner... agrees to record the fill in accordance with Rule .1707 of this Section."

.1707 (a): "the owner of the land... shall file a statement with the Register Of Deeds..."

As this reads, "the owner of land" is responsible for all recordation procedures on structural fill projects. To my knowledge ReUse has complied with all closure and recordation reporting requirements to this date. If you have any questions, please call me at (770)- 425-7676.

Sincerely,



Laura Seibert
Environmental Specialist

LLS
Enclosures

cc/enc.: Bob Waldrop



100 Chastain Center Boulevard
Suite 155
Kennesaw, Georgia 30144-5510
770.425.7676
fax 770.425.7681

<http://www.reusetech.com>

June 16, 1999

Mr. William R. Hocutt
North Carolina Department of Environment
and Natural Resources
Division of Solid Waste Management
P.O. Box 27687
Raleigh, North Carolina 27611-7687

Re: Appian Engineering Consultants
Rocky Mount, North Carolina
Notice of Cancellation

Dear Mr. Hocutt:

This is to advise you that the coal combustion by-product structural fill project planned for Appian Consulting Engineers office facility on Winstead Avenue in Rocky Mount has been cancelled. The property owner has decided against constructing an office facility at this time. No coal combustion by-products were placed at this location.

If you have any questions, please call Bob Waldrop at (770) 425-7676.

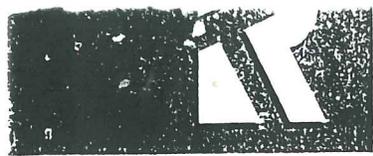
Sincerely,

Robert J Waldrop
Vice President, HR, EH&S



progress today, with respect for tomorrow. . .

printed on recycled paper



ReUse Technology, Inc.

PERMITTING • DISPOSAL PLANNING • REUSE

Bob Harding

August 22, 1994



Mr. William Meyer
State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687
401 Oberlin Building
Raleigh, North Carolina 27611-7687

RECEIVED

SEP 19 1994

DEHNR-RAL RO

Dear Mr. Meyer:

In accordance with Rule .1703 of 15A NCAC 13B, we are submitting written notice of a coal combustion by-product structural fill project. The details of the project are as follows:

.1703 (1)

Coal combustion by-products will be used as structural fill to construct building pads. The project will be located approximately one mile south of the intersection of Winstead Avenue and Sunset Avenue towards Bethlehem Road in Rocky Mount. The attached 8 1/2 inch by 11 inch topographic map is marked to show the project location. This topographic map comes from the Rocky Mount 7 1/2 minute USGS map.

.1703 (2)

The estimated start date is August 29, 1994. The estimated completion date is February 22, 1996.

.1703 (3)

Approximately 8000 cubic yards of coal combustion by-products will be used in the project.

.1703 (4)

Coal combustion by-products will be utilized from the Cogentrix facilities located in Rocky Mount and Kenansville, North Carolina. A representative TCLP analysis from each of these facilities is attached.

.1703 (5)

The property owner's statement is attached.

CORPORATE OFFICE

100 Chastain Center Boulevard • Suite 155 • Kennesaw, Georgia 30144 • Phone 404 425-7676 • Fax 404 425-7681



Printed on Recycled Paper

Mr. William Meyer
August 22, 1994
Page 2

.1703 (6)

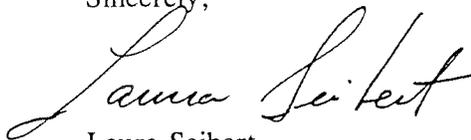
The coal combustion by-product generators are as follows:

Cogentrix of Rocky Mount, Inc.
P.O. Box 370
Route 2
State Road 1400
Battleboro, North Carolina 27809
Contact: Mark Casper
Phone: (704) 525-3800

Cogentrix Eastern Carolina Corporation
P.O. Box 806
Route 11 North
Kenansville, North Carolina 28349-0806
Contact: Mark Casper
Phone: (704) 525-3800

If there are any questions concerning this notice, please call me at (404) 425-7676.

Sincerely,



Laura Seibert
Environmental Specialist

LS/cmm
Attachment
By Federal Express
cc/att: Mark Casper
Bob Waldrop

ReUse Technology, Inc.
 100 Chastain Center Blvd.
 Suite 155
 Kennesaw, Ga. 30144
 Attn: Laura Seibert

3/24/94

The following analytical results have been obtained for the indicated samples which were submitted to this laboratory.

Project Account Code: RT001
 Location Code: Bob
 Location Description: Rocky Mount Flyash
 Laboratory Submittal Date: 1/10/94
 Laboratory Batch #: 1832

Parameter	Detection Level (mg/L)	Flyash RT06980
TCLP Metals:		
Arsenic	✓ 0.025	nd
Barium	✓ 0.5	nd
Cadmium	✓ 0.010	nd
Chromium	✓ 0.03	nd
Mercury	✓ 0.0005	nd
Lead	✓ 0.025	✓ 0.047
Seelenium	✓ 0.025	nd
Silver	✓ 0.03	nd
pH		✓ 6.29

If there are any questions regarding this data, please call.

I hereby certify that this TCLP analysis is representative of the coal combustion by-products from the Cogentrix cogeneration facility located in Rocky Mount, North Carolina.

Mark A. Casper
 Signature

Sincerely,

Marc Lavelle

Marc Lavelle
 Assistant Lab Manager

ReUse Technology
 100 Chastain Center Blvd.
 Suite 155
 Kennesaw, Ga. 30144
 Attn: Bob Waldrop

12/27/93

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory.

Project Account Code: RT001
 Location Code: Bob
 Location Description: Kenansville
 Date Sampled: 7/9/93
 Laboratory Submittal Date: 8/4/93
 Laboratory Batch #: 1656C

Parameter	Detection Level (mg/L)	Kenansville FA-03 RT06477
TCLP Metals:		
Arsenic	✓ 0.025	* 0.504
Barium	✓ 0.50	nd
Cadmium	✓ 0.015	nd
Chromium	✓ 0.05	nd
Mercury	✓ 0.0005	nd
Lead	✓ 0.005	nd
Selenium	✓ 0.025	* 0.268
Silver	✓ 0.03	nd
pH		✓ 6.23

**OK For Listed L.F.*

If there are any questions regarding this data, please call.

I HEREBY CERTIFY THAT THIS TCLP ANALYSIS IS REPRESENTATIVE OF THE COAL COMBUSTION BY-PRODUCTS FROM THE COGENTRIX COGENERATION FACILITY LOCATED IN KENANSVILLE, NORTH CAROLINA

Mark A. Casper

SIGNATURE

Sincerely,

Marc Lavelle

Marc Lavelle
 Assistant Lab Manager

COAL COMBUSTION BY-PRODUCT
STRUCTURAL FILL

LANDOWNER'S STATEMENT OF CONSENT

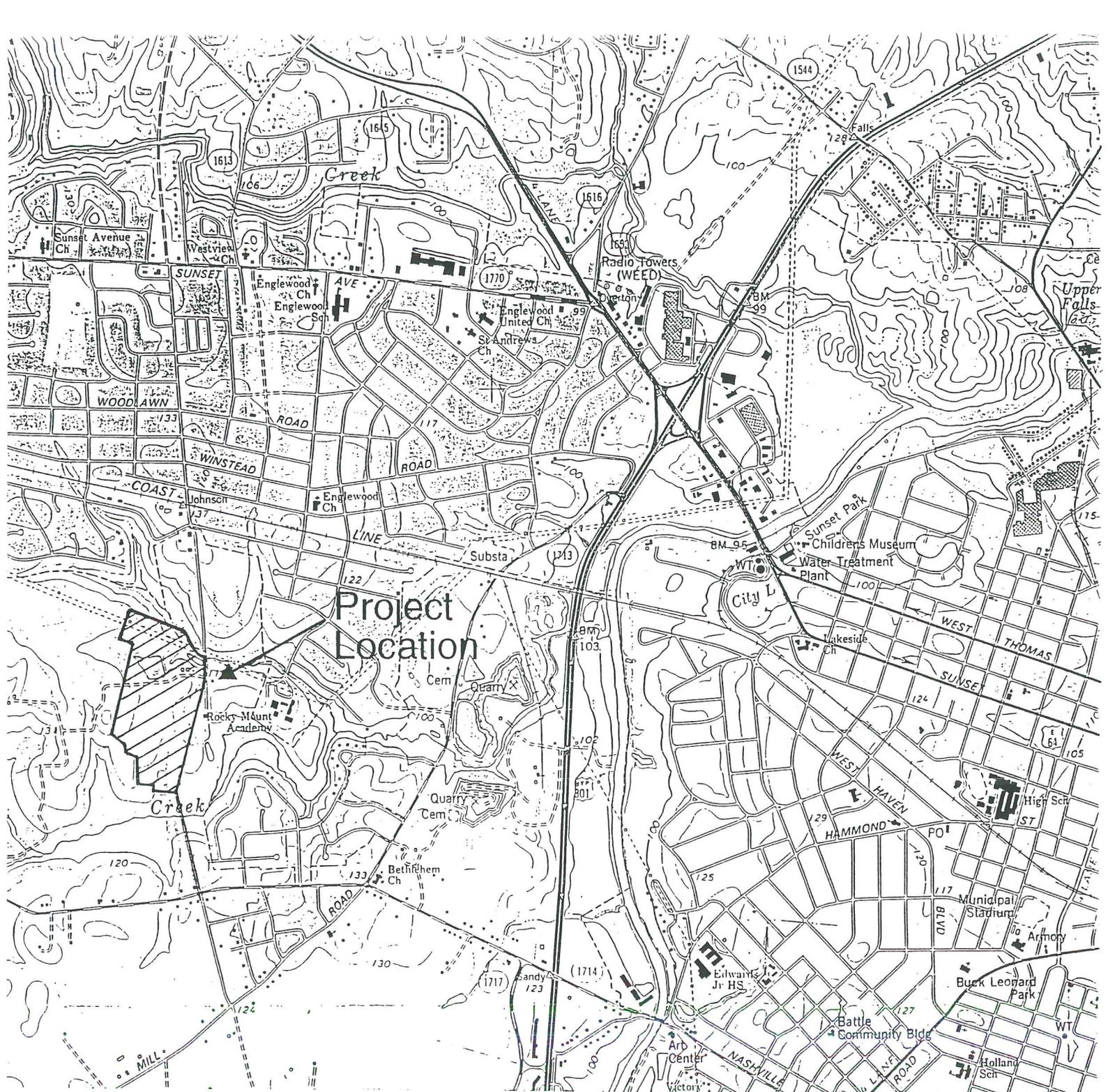
As the owner (or owner's authorized representative) of land upon which ReUse Technology plans to construct a coal combustion by-product structural fill, I hereby acknowledge and consent to the use of coal combustion by-products as structural fill. If more than one thousand (1,000) cubic yards of coal combustion by-products are utilized on this property, I agree to file a statement of the volume and locations of the coal combustion by-products with the Register of Deeds in the county or counties where the property is located in accordance with the requirements of 15A NCAC 13B.1707.

Property Location: Approximately one mile south of the intersection
of Winstead Avenue SR 1613 and Sunset Avenue
south towards Bethlehem Road, SR 1714.

Name: Englewood Baptist Church, Inc.
Stephena M. Lewis, President

Signature: Stephena M. Lewis, President

Date: August 2, 1994



Information From
Rocky Mount Quadrangles

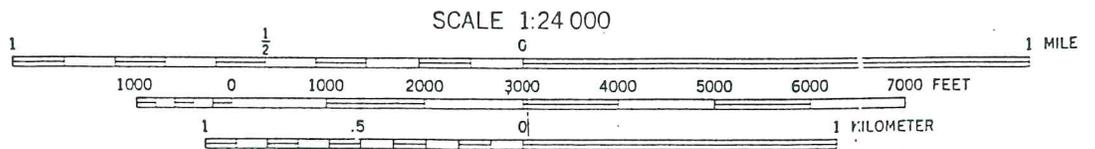


Figure 1-1
General Location Map
Englewood Baptist Church



Ben Barnes Raleigh Reg. Off.

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director



January 7, 1997



Ms. Laura L. Seibert
ReUse Technology, Inc.
100 Chastain Center Boulevard, Suite 155
Kennesaw, Georgia 30144

Subject: Notification of a Coal Combustion By-Products Structural Fill in Nash County (Rocky Mount NC) Estimated to Begin January 14, 1997 and Anticipated to be Completed by February 14, 1998.

- References:
1. December 9, 1996 Notification Letter from Laura Seibert to William R. Hocutt Pertaining to a Coal Combustion By-Products Structural Fill in Rocky Mount, NC for Appian Engineering Consultants. The site is to be Located Approximately One Mile South of the Intersection of Winstead Avenue and Sunset Avenue, Towards Bethlehem Road.
 2. December 23, 1996 Addendum Letter from Laura Seibert to William R. Hocutt on Reference # 1 Notification Letter.

Dear Ms. Seibert:

We are in receipt of your reference December 9, 1996 Notification and the December 23, 1996 addendum letter. Combined, these satisfy the Notification requirements set forth in the Solid Waste Management Rules 15 A NCAC 13B Section .1700 concerning beneficial use of coal combustion by-products. The revised map included in your addendum letter is satisfactory and the dates furnished on data submitted in your notification shows those data to be less than one year old and therefore adequate for our use.

Please be aware that analysis of groundwater samples collected from monitoring wells located at a North Carolina coal ash structural fill site revealed that levels of sulfate and arsenic were elevated above the background well values and exceeded the 15A NCAC 2L Standards. It was later found that **the ash had been placed in the ground water at this site** and the ash has been subsequently removed. The Division of Waste Management strongly recommends that you retain the services of a qualified hydrogeologic consulting firm to assist you in determining the vulnerability of the groundwater at the site based on site attenuation, waste extractability and end use to inhibit infiltration. You can then consider installation of groundwater monitoring wells depending on vulnerability before commencing fill operations.

P.O. Box 27687,
Raleigh, North Carolina 27611-7687
Voice 919-733-4996



FAX 919-715-3605
An Equal Opportunity Affirmative Action Employer
50% recycled/10% post-consumer paper

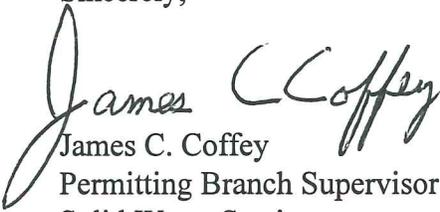
Laura Seibert
January 7, 1997
Page 2

Please contact me at 919-733-0692, extension 255 or Bill Hocutt at extension 260 if you have any questions about this.

TERRY MAL

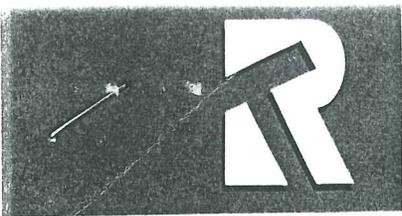
JAN 10 1997

Sincerely,


James C. Coffey
Permitting Branch Supervisor
Solid Waste Section

cc: Terry Dover
Ben Barnes
Bill Hocutt

c:wp6doc/letter/Jim/sebrt-01.97



ReUse Technology, Inc.

PERMITTING • DISPOSAL PLANNING • REUSE

December 23, 1996

Mr. William R. Hocutt
State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687
401 Oberlin Building
Raleigh, North Carolina 27611-7687

Dear Mr. Hocutt:

Per our conversation on 12/17/96, I am enclosing a revised map showing the vicinity of the Appian property. The address is approximately one mile south of the intersection of Winstead and Sunset Avenues, South towards Bethlehem Road in Rocky Mount N. C..

Also enclosed, is verification that the original TCLP submitted meets the annual requirements of .1703(a)(4).

After I received your fax I reviewed the .1700 requirements concerning; The reporting of closure dates, and The recordation processes. In Section .1702 - General Provisions . . . it states:

“The provisions of this Section shall apply to the siting, design, construction, operation, closure and recordation of projects”... “to structural fills other than those which received written approval from the Division prior to the effective date of this Section.” (January 4, 1994)

Since section .1702 covers the majority of ReUse projects listed, closure reporting is not applicable to those projects. All other ReUse jobs that fall after the effective date, have been reported, or are not applicable for reasons listed below.

- | | |
|--|----------|
| (1) Nash: Winstead & Sunset Aves (Rocky Mount)
Englewood Baptist Church | Ongoing |
| (2) Nash: TurnKey Contractors
Wright Dev. Co. | Ongoing |
| (3) Duplin: Howard Farms
Louis Howard | Canceled |

Concerning the recordation requirement process, Sections .1703 - Notification of . . . , and .1707 - Recordation of Structural Fill Facilities states:



December 23, 1996

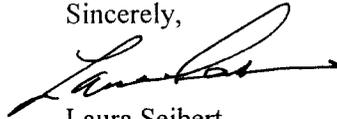
Page 2

.1703 (a)(5): "...the owner... agrees to record the fill in accordance with Rule .1707 of this Section."

.1707 (a): "the owner of the land... shall file a statement with the Register Of Deeds..."

As this reads, "the owner of land" is responsible for all recordation procedures on structural fill projects. To my knowledge ReUse has complied with all closure and recordation reporting requirements to this date. If you have any questions, please call me at (770)- 425-7676.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura Seibert", with a long horizontal flourish extending to the right.

Laura Seibert
Environmental Specialist

LLS

Enclosures

cc/enc.: Bob Waldrop

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director



September 12, 1994

Ms. Laura Seibert
ReUse Technology, Inc.
100 Chastain Center Blvd. Suite 155
Kennesaw, Georgia 30144

The Division of Solid Waste Management, (the "Division"), has received your Notification of a coal combustion by-product (ash) structural fill to be located at Rocky Mount, Nash County, N.C. and proposed to commence August 29, 1994.

Please be aware that the size of a fill project is not a decisive factor in determining if the services of a NC licensed professional engineer (PE) is necessary on a coal ash structural fill. The Section 1700 Rules do specify that a proposed fill site which anticipates utilization of 10,000 Yd³ or more of ash must include a PE approved Construction Plan in the Notification. Regardless of the volume of coal ash used in a structural fill project, the Closure Rule, 15A N.C. Administrative Code 13B .1706, requires certification signed and sealed by a PE that all rules in Section .1700 have been met. These rules include, among other things, Rule 1704 (a)(4) certification that no coal ash has been placed within two feet of the seasonal high groundwater table and certification under Rule 1705 (c) that the coal ash has been placed uniformly and compacted in lifts not exceeding one foot in thickness, compacted to standards including in-situ density, compaction effort and relative density, specified by a PE for a specific end use purpose. Rule .1705 (c) engineering specifications must be designated before commencement of the fill. Moreover, a PE cannot certify that these rules have been met unless he or she has been involved in the project from the beginning and has made periodic inspections of the work in progress.

Analyses of groundwater samples collected from monitoring wells located at a North Carolina coal ash structural fill site indicate that the ash may have caused or contributed to violation of the 15A N.C. Administrative Code 2L Standards for arsenic, cadmium, chromium, lead, and selenium, as well as elevated sulfate levels. Based upon this information, the Solid Waste Division strongly recommends that you retain the services of a qualified hydrogeologic consulting firm to assist you in determining the vulnerability of the groundwater at the site based on site attenuation, waste extractability and end use to inhibit infiltration and consider installation of groundwater monitoring wells on vulnerable sites before commencing fill operations.

Copies of this letter are being sent to the Generators and Constructors, who are responsible for apprising the Owners of the land to be filled (if not the same party as the Generator/Constructor) of the Landowner's responsibility for groundwater contamination which may result from this coal ash structural fill.

Sincerely,

Dexter R. Matthews, Chief
Solid Waste Section

cc: Bill Hocutt, Solid Waste Section

Mark Casper
Cogentrix Eastern Carolina Corporation
P.O. Box 806
Rt. 11 North
Kenansville, NC 28349-0806

Mark Casper
Cogentrix of Rocky Mount, Inc.
P.O. Box 370
Rt. 2
State Road 1400
Battleboro, NC 27809

9/13/94
Bob Waldrop was
called and told that
the letter of warning
was to be sent by
field people - 30 days
being violated, He (WRH)
said date of 8/29 incorrect.



ReUse Technology, Inc.

PERMITTING • DISPOSAL PLANNING • REUSE

Defta

August 22, 1994



Mr. William Meyer
State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687
401 Oberlin Building
Raleigh, North Carolina 27611-7687

Dear Mr. Meyer:

In accordance with Rule .1703 of 15A NCAC 13B, we are submitting written notice of a coal combustion by-product structural fill project. The details of the project are as follows:

.1703 (1)

Coal combustion by-products will be used as structural fill to construct building pads. The project will be located approximately one mile south of the intersection of Winstead Avenue and Sunset Avenue towards Bethlehem Road in Rocky Mount. The attached 8 1/2 inch by 11 inch topographic map is marked to show the project location. This topographic map comes from the Rocky Mount 7 1/2 minute USGS map.

.1703 (2)

The estimated start date is ~~August 29~~ ^{Sept 23}, 1994. The estimated completion date is February 22, 1996.

.1703 (3)

Approximately 8000 cubic yards of coal combustion by-products will be used in the project.

.1703 (4)

Coal combustion by-products will be utilized from the Cogentrix facilities located in Rocky Mount and Kenansville, North Carolina. A representative TCLP analysis from each of these facilities is attached.

.1703 (5)

The property owner's statement is attached.

CORPORATE OFFICE

100 Chastain Center Boulevard • Suite 155 • Kennesaw, Georgia 30144 • Phone 404-425-7676 • Fax 404-425-7681



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Mr. William Meyer
August 22, 1994
Page 2

.1703 (6)

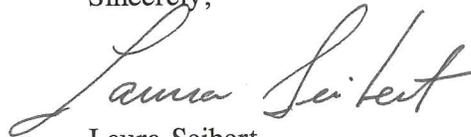
The coal combustion by-product generators are as follows:

Cogentrix of Rocky Mount, Inc.
P.O. Box 370
Route 2
State Road 1400
Battleboro, North Carolina 27809
Contact: Mark Casper
Phone: (704) 525-3800

Cogentrix Eastern Carolina Corporation
P.O. Box 806
Route 11 North
Kenansville, North Carolina 28349-0806
Contact: Mark Casper
Phone: (704) 525-3800

If there are any questions concerning this notice, please call me at (404) 425-7676.

Sincerely,



Laura Seibert
Environmental Specialist

LS/cmm
Attachment
By Federal Express
cc/att: Mark Casper
Bob Waldrop



S.W. *Kia Hatt*
ReUse Technology, Inc.

PERMITTING • DISPOSAL PLANNING • REUSE



September 15, 1994

Mr. William Meyer
State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687
401 Oberlin Building
Raleigh, North Carolina 27611-7687

Dear Mr. Meyer:

On August 22, 1994, we submitted written notice of a coal combustion by-product structural fill project located approximately one mile south of the intersection of Winstead Avenue (SR 1613) and Sunset Avenue towards Bethlehem Road (SR 1714).

Under section .1703 (2) the start date was incorrectly stated as August 29, 1994. The correct date should be September 23, 1994. There will be no ash placed on site until after the estimated start date of September 23, 1994. I am sorry for any inconvenience this may have caused.

If you have any questions or comments, please feel free to call me at (404) 425-7676.

Sincerely,

Laura Seibert
Environmental Specialist

LS/cmm
cc: Terry Dover

B:\LS\MEYER2.LTR
FILE 301.8.020.6.1

CORPORATE OFFICE

100 Chastain Center Boulevard • Suite 155 • Kennesaw, Georgia 30144 • Phone 404 425-7676 • Fax 404 425-7681



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ReUse Technology, Inc.

PERMITTING • DISPOSAL PLANNING • REUSE

September 15, 1994

Mr. William Meyer
State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687
401 Oberlin Building
Raleigh, North Carolina 27611-7687

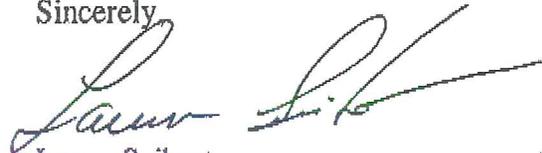
Dear Mr. Meyer:

On August 22, 1994, we submitted written notice of a coal combustion by-product structural fill project located approximately one mile south of the intersection of Winstead Avenue (SR 1613) and Sunset Avenue towards Bethlehem Road (SR 1714).

Under section .1703 (2) the start date was incorrectly stated as August 29, 1994. The correct date should be September 23, 1994. There will be no ash placed on site until after the estimated start date of September 23, 1994. I am sorry for any inconvenience this may have caused.

If you have any questions or comments, please feel free to call me at (404) 425-7676.

Sincerely,



Laura Seibert
Environmental Specialist

LS/cmm
cc: Terry Dover

B:\LSM\MEYER2.LTR
FILE 901.8.020.6.1

CORPORATE OFFICE

100 Chastain Center Boulevard • Suite 155 • Kennesaw, Georgia 30144 • Phone 404 425-7676 • Fax 404 425-7681



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**COAL COMBUSTION BY-PRODUCT
STRUCTURAL FILL**

LANDOWNER'S STATEMENT OF CONSENT

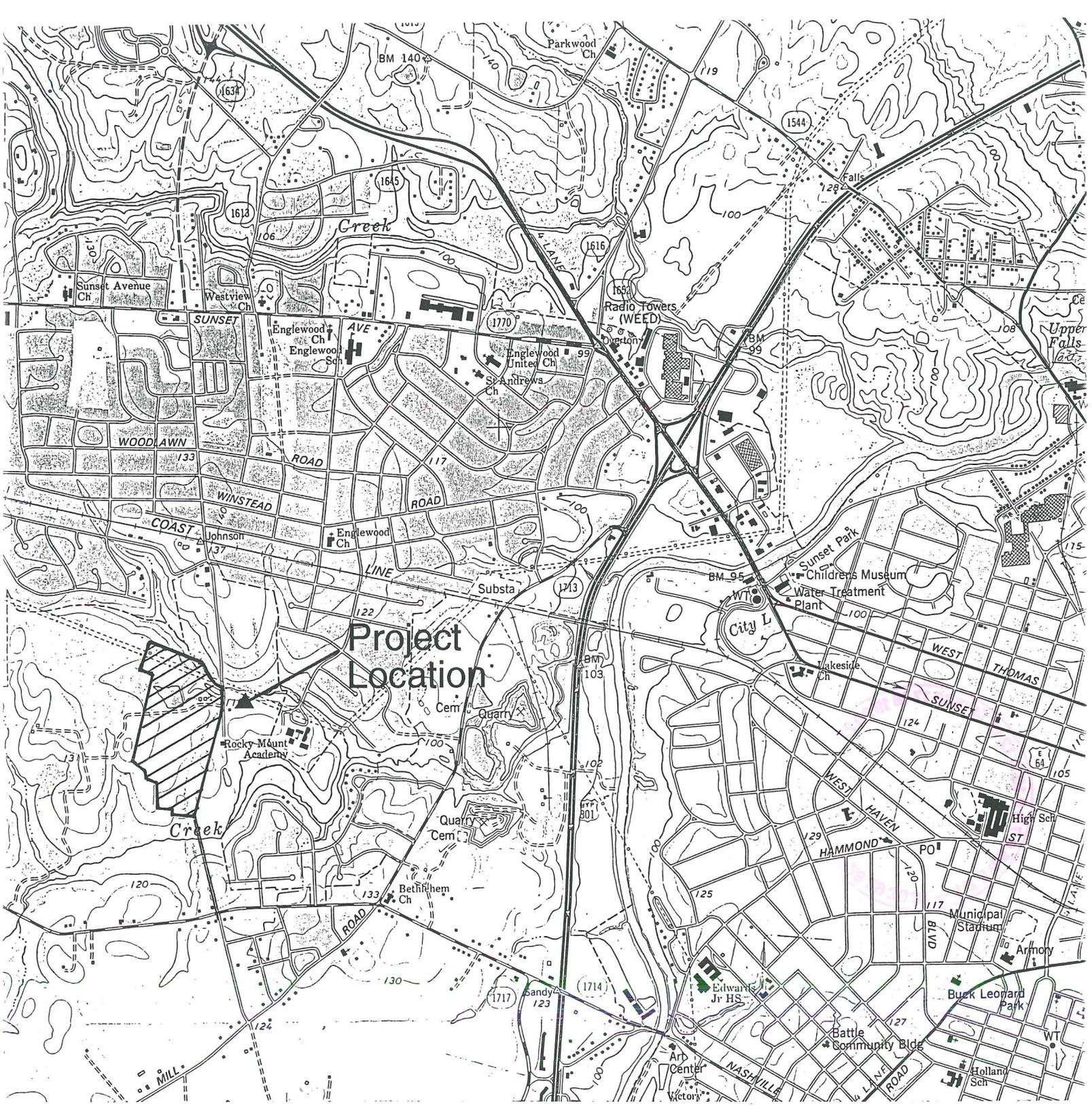
As the owner (or owner's authorized representative) of land upon which ReUse Technology plans to construct a coal combustion by-product structural fill, I hereby acknowledge and consent to the use of coal combustion by-products as structural fill. If more than one thousand (1,000) cubic yards of coal combustion by-products are utilized on this property, I agree to file a statement of the volume and locations of the coal combustion by-products with the Register of Deeds in the county or counties where the property is located in accordance with the requirements of 15A NCAC 13B.1707.

Property Location: Approximately one mile south of the intersection
of Winstead Avenue SR 1613 and Sunset Avenue
south towards Bethlehem Road, SR 1714.

Name: Englewood Baptist Church, Inc.
Stephen M. Lewis, President

Signature: Stephen M. Lewis, President

Date: August 2, 1994



Information From
Rocky Mount Quadrangles

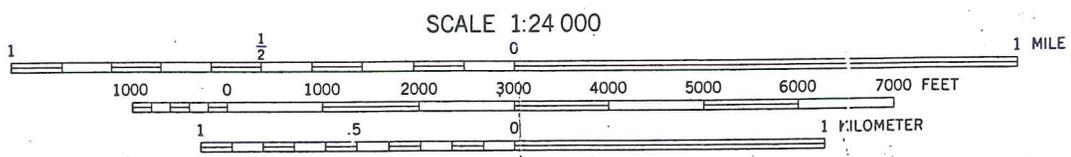


Figure 1-1
General Location Map
Englewood Baptist Church



FROM:

TO: 704 ENVIRONMENTAL SERVICES

JUL 15, 1994 9:16AM P.03

A Division of ReUse Technology

ReUse Technology
100 Chastain Center Blvd.
Suite 155
Kennesaw, Ga. 30144
Attn: Bob Waldrop

12/27/93

The following analytical results have been obtained for the indicated sample which was submitted to this laboratory.

Project Account Code: RT001
Location Code: Bob
Location Description: Kenansville
Date Sampled: 7/9/93
Laboratory Submittal Date: 8/4/93
Laboratory Batch #: 1656C

Parameter	Detection Level (mg/L)	Kenansville FA-03 RT06477
TCLP Metals:		
Arsenic	✓ 0.025	* 0.504
Barium	✓ 0.50	nd
Cadmium	✓ 0.015	nd
Chromium	✓ 0.05	nd
Mercury	✓ 0.0005	nd
Lead	✓ 0.005	nd
Selenium	✓ 0.025	* 0.268
Silver	✓ 0.03	nd
pH		✓ 6.23

**OX for listed L.F.*

If there are any questions regarding this data, please call.

I HEREBY CERTIFY THAT THIS TCLP ANALYSIS IS REPRESENTATIVE OF THE COAL COMBUSTION BY-PRODUCTS FROM THE COGENTRIX COGENERATION FACILITY LOCATED IN KENANSVILLE, NORTH CAROLINA

Mark A. Casper

SIGNATURE

Sincerely,

Marc Lavelle

Marc Lavelle
Assistant Lab Manager

FROM:

TO:

704

JUL 15, 1994

9:16AM

P.02

A Division of ReUse Technology, Inc.

ReUse Technology, Inc.
100 Chastain Center Blvd.
Suite 155
Kennesaw, Ga. 30144
Attn: Laura Seibert

3/24/94

The following analytical results have been obtained for the indicated samples which were submitted to this laboratory.

Project Account Code: RT001
Location Code: Bob
Location Description: Rocky Mount Flyash
Laboratory Submittal Date: 1/10/94
Laboratory Batch #: 1832

Parameter	Detection Level (mg/L)	Flyash RT06980
TCLP Metals:		
Arsenic	✓ 0.025	nd
Barium	✓ 0.5	nd
Cadmium	✓ 0.010	nd
Chromium	✓ 0.03	nd
Mercury	✓ 0.0005	nd
Lead	✓ 0.025	✓ 0.047
Selenium	✓ 0.025	nd
Silver	✓ 0.03	nd
pH		✓ 6.29

If there are any questions regarding this data, please call.

I hereby certify that this TCLP analysis is representative of the coal combustion by-products from the Cogentrix cogeneration facility located in Rocky Mount, North Carolina.

Mark A. Casper
Signature

Sincerely,



Marc Lavelle
Assistant Lab Manager

8/13/99

Ben BARN: called: Steve Critchfield with Reuse Tech
told BEN that:

4046 TONS Coal Ash under Bldg @ ^{the church} property.

8/16/99 AM

Ben out 8/16 Mon.

(will be in Tuesday 8/17) Left voice mail @ Ben's
asking for name of person telling him about
the 4046 tons of ash on the church property
under the church

$$\text{Area} = 208.7103256' \times 208.7103256' = 43,560 \text{ft}^2$$
$$" = 4840 \text{yd}^2$$

.1708(4) Jim interprets as being

$$[43,560 \times 0.25 (= 6 \text{ inches deep})] \div 27 = 806.67 \text{yd}^3$$

Which is $\approx 1,000 \text{yd}^3/\text{acre}$ which J. Coffey says
is threshold for recordation.

June 16, '99 Letter cancelling Appian Project

Need 1706 (d) on Englewood Baptist church

E1707

Recordation

Recordation

Recordation -

1. Telephone Bob Waldrop 770-425-7676
Re: Cancellation of Appian Consulting Engineers
office facility on Winstead Ave. in Rky Mt.
June 16, 1999 Letter from Waldrop to me said
this project has been cancelled.

2. Dec. 23, 1996 Letter from Laura Seibert Saging
closure Report as per .170L Not Applicable to
Englewood Baptist Church project in Rky. Mt. because
it was ongoing. This project is now completed
and has been for "some time", ∴ closing needs
to be reported. Steve Ritchfield (with Re-Use ~~of~~
~~Technology~~ Technology in Rky. Mt.) informed Ben
Barnes on 8/10-8/13 that 4,046 tons of Fly Ash
was under the Church bldg. PE stamp needed on
Report made as per .170G.

30 working
or 60 calendar
days to submit
closure Report.

Recordation needed on this project. (was due
within 90 days of closing.)

2/3

3. Annual report due Oct 1 -

Bob said church project is to be further expanded
maybe in the future (mos., 1 gr.?). He agreed to
close out at this point & have them record at
this point. If the project restarts, he will
renotify etc.