

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



December 7, 1993

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

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

RE: Notice Of Violation Of Groundwater Quality Standards At The  
ReUse Technology Coal Ash Structural Fill, Alamac Road Site In  
Lumberton, North Carolina.

Dear Mr. Waldrop,

Pursuant to N.C.G.S. 130A-22(a), 15A N.C.A.C. 13B, and 15A N.C.A.C. 2L, ReUse Technology, Inc. is hereby informed that there have been exceedances of the State's Groundwater Quality Standards at the compliance boundary established at the Coal Ash Structural Fill at the Alamac Road site in Lumberton, North Carolina.

From October 29, 1992 to May 25, 1993 the Solid Waste Section received analytical results from three different sampling episodes at the Alamac Road site. The samples were collected and analyzed by RT Environmental Services, a Division of ReUse Technology.

The data indicates significant violations of several Class GA groundwater quality standards. The levels of arsenic, cadmium, chromium, lead, selenium, sulfate, and total dissolved solids (TDS) reported have exceeded standards, at various times, during the forementioned sampling episodes.

Of concern to the Solid Waste Section is the private residence that may have a drinking water well approximately 250 feet from monitoring well #2. Monitoring well #2 groundwater data from the sampling episode on February 25, 1993, indicated a cadmium level that exceeded the standard and data from the October 29, 1992 episode indicated levels of chromium and lead that exceeded the standards.

The Solid Waste Management Rules (15A N.C.A.C. 13B) adopt by reference The Classifications And Water Quality Standards Applicable To The Groundwaters of North Carolina (15A N.C.A.C. 2L).

Based on the foregoing, reference 15A N.C.A.C. 2L .0106(c) of the rules requires ReUse Technology to prepare a ground-water assessment plan. An Administrative Agreement On Consent is an appropriate mechanism to outline the roles of ReUse Technology and the State in pursuing the ground-water quality assessment. Within 30 days, ReUse Technology must inform the Solid Waste Section in writing if they are willing to enter into such a Consent Agreement. A draft copy of a proposed consent agreement will be sent to you for your review within the next few days. If a Consent Agreement is not executed within 60 days to the satisfaction of the Solid Waste Section, an Administrative Compliance Order will be issued detailing ReUse Technology's responsibilities for further action.

Pursuant to N.C.G.S. 130A-22(a) and 15A N.C.A.C. 13B Section .0701 - .0707, an administrative penalty of up to \$5,000.00 per day may be assessed for violation of the Solid Waste Management Law or Regulations.

If you have any further questions concerning this matter, please contact Mark Poindexter, Solid Waste Section at (919) 733-0692.

Sincerely,



Dexter R. Matthews, Chief  
Solid Waste Section

cc: Terry Dover  
Isaiah Guyton  
Mark Poindexter  
Nancy Scott  
Arthur Mouberry