



North Carolina Department of Environment and Natural Resources

Pat McCrory  
Governor

John E. Skvarla, III  
Secretary

June 3, 2014

Michael L. Holder, P.E. – Chief Engineer  
NC Department of Transportation  
1536 Mail Service Center  
Raleigh, NC 27601-1536

Subject: Permit No. WQ0035749  
Diamond Grinding/Hydrodemolition  
Land Application of Diamond  
Grinding and Hydrodemolition  
Operation Slurry (503 exempt)  
Statewide

Dear Mr. Holder:

In accordance with your permit modification request received April 25, 2014, we are forwarding herewith Permit No. WQ0035749, dated June 3, 2014, to the NC Department of Transportation for the operation of the subject residuals management program.

Modifications to the subject permit are as follows:

- ◆ Condition III.3. in previous permit – regarding the requirement for a verification that DGS and HOS do not exceed the metals ceiling concentration or TCLP limits. This condition is removed based on our review of the submitted data which demonstrate that such parameter(s) has no significant concentration.
- ◆ Condition III.8 (l) in previous permit – regarding ground cover requirement is removed.
- ◆ Condition IV.2 in previous permit – the TCLP analysis and monitor is removed based on the submitted data which show very low detections or non-detected parameters.
- ◆ Condition IV.2 (formerly IV.3 in previous permit) – The bi-monthly sampling requirement is removed and monitoring parameters are reduced per your request. In addition, additional language is added to allow sampling in storage unit/tank.

**The submitted data show all samples with pH very close to or greater than 12.5, therefore, pH adjustment may be necessary prior to land applying the materials. Please note that DGS or HOS shall not be land applied if its pH is greater than or equal to 12.5.**

This permit shall be effective from the date of issuance until May 31, 2017, shall void Permit No. WQ000035749 issued April 24, 2013, and shall be subject to the conditions and limitations as specified therein. Please pay particular attention to the monitoring requirements listed in Section IV. Failure to establish an adequate system for collecting and maintaining the required operational information shall result in future compliance problems.

If any parts, requirements or limitations contained in this permit are unacceptable, the Permittee has the right to request an adjudicatory hearing upon written request within 30 days following receipt of this permit. This request shall be in the form of a written petition, conforming to Chapter 150B of the North Carolina General Statutes, and filed with the Office of Administrative Hearings at 6714 Mail Service Center, Raleigh, NC 27699-6714. Unless such demands are made, this permit shall be final and binding.

If you need additional information concerning this matter, please contact Chonticha McDaniel at (919) 807-6337 or [chonticha.mcdaniel@ncdenr.gov](mailto:chonticha.mcdaniel@ncdenr.gov).

Sincerely,

  
Thomas A. Reeder, Director  
Division of Water Resources

cc: Asheville Regional Office, Water Quality Regional Operations Section  
Fayetteville Regional Office, Water Quality Regional Operations Section  
 Mooresville Regional Office, Water Quality Regional Operations Section  
Raleigh Regional Office, Water Quality Regional Operations Section  
Washington Regional Office, Water Quality Regional Operations Section  
Wilmington Regional Office, Water Quality Regional Operations Section  
Winston-Salem Regional Office, Water Quality Regional Operations Section  
Rob Willcox, LSS – S&ME, Inc. (3718 Old Battleground Rd, Greensboro, NC 27410)  
Permit File WQ0035749  
Notebook File WQ0035749

**NORTH CAROLINA**  
**ENVIRONMENTAL MANAGEMENT COMMISSION**  
**DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES**  
**RALEIGH**

**DISTRIBUTION AND LAND APPLICATION OF DIAMOND GRINDING AND  
HYDRODEMOLITION OPERATION SLURRY PERMIT (503 EXEMPT)**

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In accordance with the provisions of Article 21 of Chapter 143, General Statutes of North Carolina as amended, and other applicable Laws, Rules, and Regulations

PERMISSION IS HEREBY GRANTED TO

**NC Department of Transportation**  
(Statewide)

FOR THE

operation of a Diamond Grinding Slurry (DGS) and Hydrodemolition Operation Slurry (HOS) management program for the North Carolina Department of Transportation and consisting of the distribution and land application of slurry (containing water and pulverized concrete) generated by the diamond grinding of concrete pavement during road construction or maintenance projects, and slurry generated by the concrete hydrodemolition operation during bridge deck restoration process with no discharge of wastes to surface waters, pursuant to the application received April 25, 2014, and in conformity with other supporting data subsequently filed and approved by the Department of Environment and Natural Resources and considered a part of this permit.

This permit shall be effective from the date of issuance until May 31, 2017, and shall be subject to the following specified conditions and limitations:

**I. SCHEDULES**

1. No later than six months prior to the expiration of this permit, the Permittee shall request renewal of this permit on official Division forms. Upon receipt of the request, the Division will review the adequacy of the facilities described therein, and if warranted, will renew the permit for such period of time and under such conditions and limitations as it may deem appropriate. Please note Rule 15A NCAC 02T .0105(d) requires an updated site map to be submitted with the permit renewal application.

**II. PERFORMANCE STANDARDS**

1. The subject residuals management program shall be effectively maintained and operated at all times so there is no discharge to surface waters, nor any contravention of groundwater or surface water standards. In the event the facilities fail to perform satisfactorily, including the creation of nuisance conditions due to improper operation and maintenance, the Permittee shall immediately cease land applying DGS or HOS to the site, contact the appropriate regional office supervisor for the county in which the land application site is located, and take any immediate corrective actions.
2. This permit shall not relieve the Permittee of their responsibility for damages to groundwater or surface water resulting from the operation of this residuals management program.

3. Only slurry generated by the diamond grinding process and/or the hydrodemolition operation are approved for land application in accordance with this permit.
4. Pollutant concentrations in DGS or HOS applied to any land application site shall not exceed the following **Ceiling Concentrations** or **Monthly Average Concentrations** (i.e., dry weight basis):

<b>Parameter</b>	<b>Ceiling Concentration (milligrams per kilogram)</b>	<b>Monthly Average Concentration (milligrams per kilogram)</b>
Arsenic	75	41
Cadmium	85	39
Copper	4,300	1,500
Lead	840	300
Mercury	57	17
Molybdenum	75	n/a
Nickel	420	420
Selenium	100	100
Zinc	7,500	2,800

5. Setbacks for land applied DGS or HOS shall be as follows:

<b>Setback Description</b>	<b>Setback by residual type (feet)</b>	
	<b>Liquid</b>	<b>Cake*</b>
Private or public water supply	100	100
Surface waters (streams – intermittent and perennial, perennial waterbodies, and wetlands)	100	25
Surface water diversions (ephemeral streams, waterways, ditches)	25	0
Groundwater lowering ditches (where the bottom of the ditch intersects the SHWT)	25	0
Wells with exception to monitoring wells	100	100
Bedrock outcrops	25	0

\* “Cake” residuals are those that have greater than 15% solids by weight and can be stacked without flowing, as well as can be handled, transported and spread as a solid (e.g., using a backhoe, front end loader, slinger spreader, broadcast spreader or other equipment designed for handling solid materials) without leaving any significant liquid fraction behind.

6. Land application areas shall be clearly marked on each site prior to and during any DGS/HOS application event.
7. DGS/HOS shall not be applied in exceedance of agronomic rates or hydraulic capacity of the soils; whichever is most limiting. Appropriate agronomic rates based on plant available nitrogen (PAN) and phosphorous shall be determined using one of the following methods:
  - a. North Carolina Historical Data for specific crop and soil types as provided by North Carolina State University Department of Soil Science (<http://www.soil.ncsu.edu/programs/nmp/yields/>), or
  - b. The crop management plan outlined by the local Cooperative Extension Office, the Department of Agriculture and Consumer Services, the Natural Resource Conservation Service, or an agronomist, and

- c. If the appropriate nutrient application rates cannot be determined, the Permittee shall contact the Division to determine necessary action.
8. DGS/HOS shall not be applied in exceedance of the soil test results or recommendations from an agronomist on the amount of DGS/HOS needed for soil pH adjustment (i.e. lime equivalency rates).

### **III. OPERATION AND MAINTENANCE REQUIREMENTS**

1. The DGS and HOS management program shall be properly maintained and operated at all times. The program shall be effectively maintained and operated as a non-discharge system to prevent any contravention of surface water or groundwater standards.
2. The appropriate Division of Water Resources Regional Office(s), to be determined based on the county(ies) in which the land application sites are located (see Figure 1 - Regional Offices Map), shall be notified at least 48 hours prior to the DGS or HOS application to any land application site unless a project meeting opportunity has been established with an appropriate regional office. Notification to the regional office supervisor shall be made from 8:00 a.m. until 5:00 p.m. on Monday through Friday, excluding State Holidays.
3. The Permittee shall maintain an Operation and Maintenance Plan (O&M Plan) pursuant to 15A NCAC 02T .1110. The O&M Plan, at the minimum, shall include:
  - a. Operational functions;
  - b. Maintenance schedules;
  - c. Safety measures;
  - d. Spill response plan; and
  - e. Sampling and monitoring plan including sampling frequency and guidelines for pH adjustment.
4. During land application activities, a copy of this permit and a copy of O&M Plan shall be maintained at the land application sites.
5. When the Permittee transports or land applies DGS or HOS, the spill control provisions shall be maintained in all DGS/HOS transport and application vehicles.
6. Adequate measures shall be taken to prevent wind erosion and surface runoff from conveying DGS or HOS from the land application sites onto adjacent properties or into surface waters.
7. DGS or HOS shall not be land applied under the following conditions:
  - a. If the DGS/HOS are likely to adversely affect a threatened or endangered species listed under section 4 of the Endangered Species Act or its designated critical habitat;
  - b. If the application causes prolonged nuisance conditions;
  - c. If the land fails to assimilate the DGS/HOS or the application causes the contravention of surface water or groundwater standards;
  - d. If the land is flooded, frozen or snow-covered, or is otherwise in a condition such that runoff of the DGS/HOS would occur;
  - e. Within the 100-year flood elevation, unless the DGS/HOS are injected or incorporated within a 24-hour period following a land application event;
  - f. During a measurable precipitation event (i.e., greater than 0.01 inch per hour), or within 24 hours following a rainfall event of 0.5 inches or greater in a 24-hour period;
  - g. If the slope is greater than 10% for surface applied DGS/HOS, or if the slope is greater than 18% for injected or incorporated DGS/HOS;

- h. If the land is not intended to be used for agriculture (or turf, ornamentals trees, and other vegetative practices along NCDOT right of way) within 12 months following any previous DGS/HOS land application event;
  - i. If the DGS/HOS pH is greater than or equal to 12.5;
  - j. If the vertical separation between the seasonal high water table and the depth of DGS/HOS application is less than one foot;
  - k. If the vertical separation of bedrock and the depth of DGS/HOS application is less than one foot;
8. DGS and HOS shall be adequately recovered and stored to prevent runoff. DGS and HOS may be recovered and stored in mobile storage units at or near each project site. If an alternate storage site is used, approval must be obtained from the Division.
9. A Utilization Agreement between the Permittee and the entity agreeing to accept and distribute DGS or HOS shall be in place prior to distribution of the bulk residuals. The agreement shall specify the agreeing entity's responsibilities. The Permittee or his designee and the person responsible for application of the DGS/HOS shall sign the Utilization Agreement, which shall be considered expired concurrent with the permit expiration date, and shall be renewed during the permit renewal process.
10. At a minimum, the Utilization Agreement shall stipulate the following:
  - a. By agreeing to accept the DGS/HOS, it is recognized that the application of these materials is allowed under the conditions of this agreement. Land application of DGS/HOS is considered the beneficial reuse of a waste under 15A NCAC 02T .1100, and has been deemed permitted under 15A NCAC 02T .1103(4) provided the conditions of this agreement are met. Any action resulting in damages to surface water or groundwater, caused by failure to follow the conditions of this agreement, is subject to Division enforcement action;
  - b. The person or entity accepting the DGS/HOS shall to the best of their knowledge meet the following application requirements:
    - i. DGS/HOS shall not be land applied under the following conditions (list all prohibitions under Condition III.8).
    - ii. DGS/HOS shall not be stockpiled or stored offsite for more than 60 days prior to land application;
    - iii. Application of DGS/HOS shall not occur within 100 feet of a public or private water supply source;
    - iv. Application of DGS/HOS shall not occur within 100 feet of any well, with the exception of Division approved monitoring wells;
    - v. Application of DGS/HOS shall not occur within 25 feet of surface waters.
  - c. The generator of the DGS/HOS shall provide information on the proper use of the DGS/HOS, including information on the nutrient and lime quantities within the DGS/HOS and recommended application rates. A copy of the label or information sheet attached to bags or other containers, as specified in the labeling requirements under Condition III.12 is sufficient;
  - d. The applicator or party accepting bulk residuals from the Permittee shall supply all third parties receiving bulk residuals with documentation specifying that application shall occur consistent with the utilization agreement;
  - e. Instructions, including contact information for key personnel, shall be provided to the applicator or party receiving bulk residuals in the event that any requirements specified in the utilization agreement are not met.
  - f. A copy of the Utilization Agreement shall be maintained at the land application sites when bulk residuals are being applied.

11. An information sheet shall be provided to the person who receives the DGS or HOS (i.e., landowner, lessee, or operator). At a minimum, the label or information sheet shall contain the following:
  - a. Description of DGS/HOS and its contents (nutrients, lime value, etc.);
  - b. A statement that land application of DGS/HOS is prohibited except in accordance with the instructions on the information sheet;
  - c. A statement identifying that the DGS/HOS shall be prevented from entering any public or private water supply source (including wells) and any surface water (e.g., stream, lake, river, wetland, etc.);
  - d. A statement that the DGS/HOS will be applied at agronomic rates, hydraulic capacity of the soils, or lime equivalency of the DGS/HOS; whichever is most limiting.
12. The Permittee shall not distribute DGS/HOS to any person or entity known to be applying residuals contrary to the condition of the signed Utilization Agreement.
13. DGS/HOS may be applied within medians located at the project site provided that a 25-foot setback to all drop inlets along the median is maintained and appropriate BMPs are used to prevent surface runoff from entering the storm drain system unimpeded. Areas where groundwater is less than one (1) foot from the ground surface or areas with a defined channel shall be buffered out.
14. DGS/HOS may be used as soil amendment and land applied by injection or incorporation method within roadbed fill areas where site grading is actively taking place. The Permittee shall recommend the suitable application rate and receive approval from the Division prior to beginning land application in these areas. Caution must be taken to prevent surface runoff.

#### **IV. MONITORING AND REPORTING REQUIREMENTS**

1. In the event the facilities fail to perform satisfactorily due to improper operation and maintenance resulting in discharges of DGS/HOS to surface waters or any contravention of groundwater and/or surface water standards, any Division required monitoring (including groundwater, plant tissue, soil and surface water analyses) necessary to ensure groundwater and surface water protection shall be established, and an acceptable sample reporting schedule shall be followed.
2. An analysis shall be conducted on DGS and HOS from each road construction project prior to the initial land application event, and the Permittee shall maintain the results for a minimum of five years. The analysis shall include the following parameters:

Calcium Carbonate Equivalence (CCE)	Percent Total Solids	pH*
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\*pH shall be sampled for each truckload (or storage unit/tank provided that no additional waste is added to the unit after the sampling event) to demonstrate that the DGS/HOS is non-hazardous under the RCRA (i.e.  $2.0 \geq \text{pH} \leq 12.5$ ).

The Permittee may request a permit modification to reduce the frequency and/or monitoring parameters required after sufficient amount of sampling data are collected and the data demonstrate that such parameter(s) has no significant concentration and pose no risk to human health or the environment.

3. Measurement of DGS/HOS pH shall be performed in accordance with the EPA Test Method 9040C (<http://www.epa.gov/epawaste/hazard/testmethods/sw846/pdfs/9040c.pdf>).
4. Laboratory parameter analyses shall be performed on the DGS/HOS after any polymer or chemical additions, as they are land applied, and shall be in accordance with the monitoring requirements in 15A NCAC 02B .0505.

5. The Permittee shall maintain records tracking all DGS/HOS land application events. At a minimum, these records shall include the following:
  - a. Source of DGS/HOS (i.e., project name and location);
  - b. Date of land application;
  - c. Location of receiving site (i.e., land owner name, address, latitude and longitude);
  - d. Volume of DGS/HOS applied to each site (dry weight or in gallons with %solids included);
6. All monitoring results and records tracking as required under Condition IV.2 and IV.5 shall be submitted annually on or before March 1<sup>st</sup>. The annual report and seven (7) additional copies (to be forwarded to regional offices) shall be submitted to the following address:

Division of Water Resources  
Information Processing Unit  
1617 Mail Service Center  
Raleigh, North Carolina 27699-1617

**7. Noncompliance Notification**

The Permittee shall report by telephone to the appropriate Regional Office for the county in which the project is located (see Figure 1 - Regional Offices Map), as soon as possible, but in no case more than 24 hours or on the next working day following the occurrence or first knowledge of the occurrence of any of the following:

- a. Any occurrence with the land application program resulting in the land application of significant amounts of wastes that are abnormal in quantity or characteristic.
- b. Any failure of the land application program resulting in a release of material to surface waters.
- c. Any time self-monitoring indicates the facility has gone out of compliance with its permit limitations.
- d. Any process unit failure, due to known or unknown reasons, rendering the land application incapable of adequate operation.
- e. Any spill or discharge from a vehicle or piping system during DGS/HOS transportation.

Any emergency requiring immediate reporting (e.g., discharges to surface waters, imminent failure of a storage structure, etc.) outside normal business hours shall be reported to the Division's Emergency Response personnel at telephone number (800) 662-7956, (800) 858-0368, or (919) 733-3300. Persons reporting such occurrences by telephone shall also file a written report in letter form within five days following first knowledge of the occurrence. This report shall outline the actions taken or proposed to be taken to ensure that the problem does not recur.

**V. INSPECTIONS**

1. The Permittee shall provide adequate inspection and maintenance to ensure proper operation of the subject program and shall be in accordance with the approved O&M Plan.
2. Prior to each land application event, the Permittee or his designee shall inspect the DGS/HOS storage, transport and application equipments to prevent malfunctions, deterioration and operator errors resulting in discharges, which may cause the release of wastes to the environment, a threat to human health or a public nuisance. The Permittee shall maintain an inspection log that includes, at a minimum, the date and time of inspection, observations made, and any maintenance, repairs, or corrective actions taken. The Permittee shall maintain this inspection log for a period of five years from the date of inspection, and this log shall be made available to the Division upon request.

3. Any duly authorized Division representative may, upon presentation of credentials, enter and inspect any property, premises or place on or related to the land application sites or facilities permitted herein at any reasonable time for the purpose of determining compliance with this permit; may inspect or copy any records required to be maintained under the terms and conditions of this permit; and may collect groundwater, surface water or leachate samples.

**VI. GENERAL CONDITIONS**

1. Failure to comply with the conditions and limitations contained herein may subject the Permittee to an enforcement action by the Division in accordance with North Carolina General Statutes 143-215.6A to 143-215.6C.
2. This permit shall become voidable if the land application events are not carried out in accordance with the conditions of this permit.
3. This permit is effective only with respect to the nature and volume of DGS/HOS described in the permit application and other supporting documentation.
4. The issuance of this permit does not exempt the Permittee from complying with any and all statutes, rules, regulations, or ordinances, which may be imposed by other jurisdictional government agencies (e.g., local, state, and federal). Of particular concern to the Division are applicable river buffer rules in 15A NCAC 02B .0200; erosion and sedimentation control requirements in 15A NCAC Chapter 4 and under the Division's General Permit NCG010000; any requirements pertaining to wetlands under 15A NCAC 02B .0200 and 02H .0500; and documentation of compliance with Article 21 Part 6 of Chapter 143 of the General Statutes.
5. In the event the DGS and HOS management program changes ownership or the Permittee changes their name, a formal permit modification request shall be submitted to the Division. This request shall be made on official Division forms, and shall include appropriate documentation from the parties involved and other supporting documentation as necessary. The Permittee of record shall remain fully responsible for maintaining and operating the program permitted herein until a permit is issued to the new owner.
6. This permit is subject to revocation or unilateral modification upon 60 days notice from the Division Director, in whole or part for the requirements listed in 15A NCAC 02T .0110.
7. Unless the Division Director grants a variance, expansion of the permitted DGS/HOS management program contained herein shall not be granted if the Permittee exemplifies any of the criteria in 15A NCAC 02T .0120(b).
8. The Permittee shall pay the annual fee within 30 days after being billed by the Division or an electronic inter-agency billing shall be established. Failure to pay the annual fee accordingly shall be cause for the Division to revoke this permit pursuant to 15A NCAC 02T .0105(e)(3).

Permit issued this the 3<sup>rd</sup> day of June 2014

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION

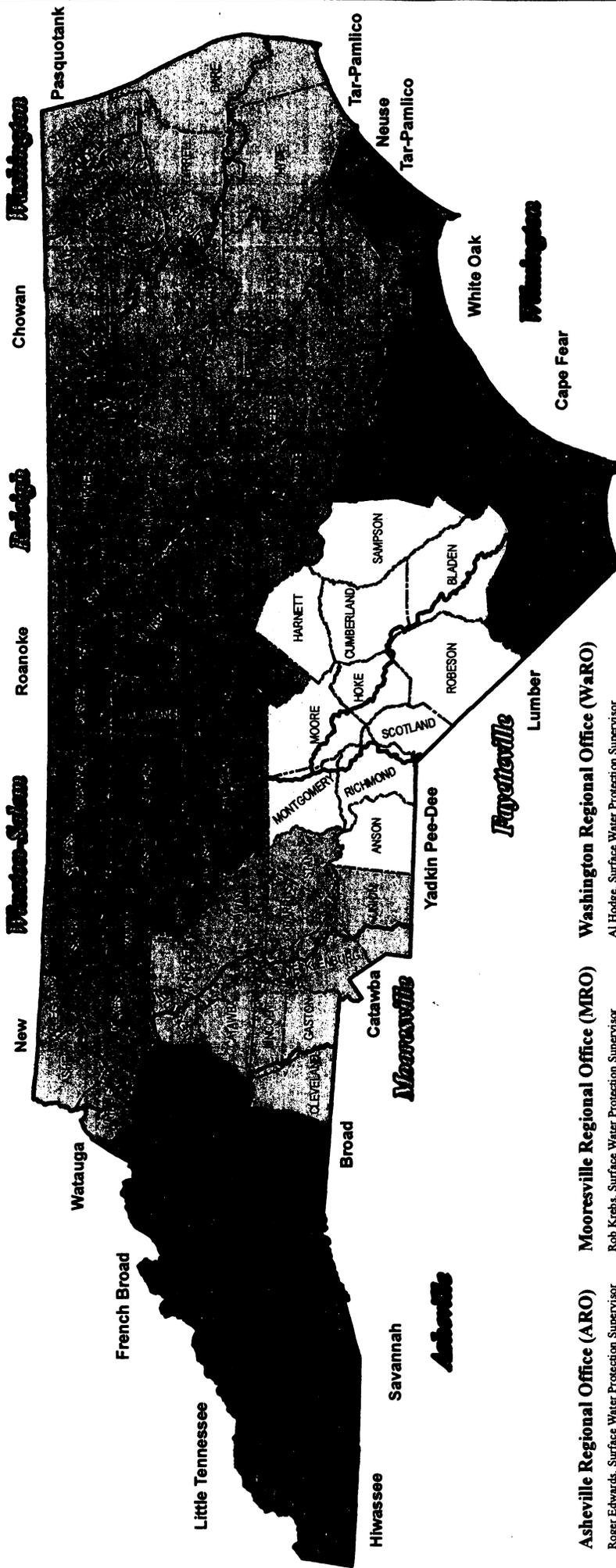


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Thomas A. Reeder, Director  
Division of Water Resources  
By Authority of the Environmental Management Commission

**Permit Number WQ0035749**

# North Carolina Department of Environment and Natural Resources Division of Water Quality Regional Offices



**Asheville Regional Office (ARO)**  
Roger Edwards, Surface Water Protection Supervisor  
Landon Davidson, Aquifer Protection Supervisor  
2090 US Highway 70  
Swannanoa, NC 28778  
Phone: (828) 296-4500  
Fax: (828) 299-7043

- Avery
- Buncombe
- Burke
- Caldwell
- Cherokee
- Clay
- Graham
- Haywood
- Henderson
- Jackson
- Madison
- McDowell
- Mitchell
- Polk
- Rutherford
- Swain
- Transylvania
- Yancy

**Mooresville Regional Office (MRO)**  
Rob Krebs, Surface Water Protection Supervisor  
Andrew Piner, Aquifer Protection Supervisor  
610 East Center Avenue, Suite 301  
Mooresville, NC 28115  
Phone: (704) 663-1699  
Fax: (704) 663-6040

- Alexander
- Cabarrus
- Catawba
- Cleveland
- Gaston
- Iredell
- Lincoln
- Mecklenburg
- Rowan
- Stanol
- Union

**Washington Regional Office (WaRO)**  
Al Hodge, Surface Water Protection Supervisor  
David May, Aquifer Protection Supervisor  
943 Washington Square Mall  
Washington, NC 27889  
COURIER 16-04-01  
Phone: (252) 946-6481  
Fax: (252) 946-9215 or (252) 975-3716

- Beaufort
- Bertie
- Camden
- Chowan
- Craven
- Currituck
- Dare
- Gates
- Greene
- Hertford
- Hyde
- Jones
- Tyrell
- Washington
- Wayne

**Winston-Salem Regional Office (WSRO)**  
Corey Basinger, Surface Water Protection Supervisor  
Sherri Knight, Aquifer Protection Supervisor  
585 Waughtown Street  
Winston-Salem, NC 27107  
COURIER 13-15-01  
Phone: (336) 771-5000  
Fax: (336) 771-4631

- Alamance
- Alleghany
- Ashe
- Caswell
- Davidson
- Davie
- Forsyth
- Guilford
- Randolph
- Rockingham
- Stokes
- Surry
- Watauga
- Wilkes
- Yadkin

**Fayetteville Regional Office (FRO)**  
Belinda Henson, Surface Water Protection Supervisor  
Art Barnhardt, Aquifer Protection Supervisor  
225 Green Street  
Systel Building Suite 714  
Fayetteville, NC 28301-5043  
COURIER 14-56-25  
Phone: (910) 433-3300  
Fax: (910) 486-0707

- Anson
- Bladen
- Cumberland
- Harnett
- Hoke
- Montgomery
- Moore
- Richmond
- Robeson
- Sampson
- Scotland
- Vance
- Wake
- Warren
- Wilson

**Wilmington Regional Office (WRO)**  
Rick Shiver, Surface Water Protection Supervisor  
Charlie Stehman, Aquifer Protection Supervisor  
127 Cardinal Drive Extension  
Wilmington, NC 28405-2845  
COURIER 04-16-33  
Phone: (910) 796-7215  
Fax: (910) 350-2004

- Brunswick
- Carteret
- Columbus
- Duplin
- New Hanover
- Onslow
- Pender

**Raleigh Regional Office (RRO)**  
Danny Smith, Surface Water Protection Supervisor  
Jay Zimmerman, Aquifer Protection Supervisor  
3800 Barrett Drive  
Raleigh, NC 27609  
COURIER 52-01-00  
Phone: (919) 791-4200  
Fax: (919) 571-4718

- Chatham
- Durham
- Edgecombe
- Franklin
- Granville
- Halifax
- Johnston
- Lee
- Nash
- Northampton
- Person
- Vance
- Wake
- Warren
- Wilson

**Winston-Salem Regional Office (WSRO)**  
Corey Basinger, Surface Water Protection Supervisor  
Sherri Knight, Aquifer Protection Supervisor  
585 Waughtown Street  
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- Yadkin

