

MEETINGS WITH FEDERAL, STATE, AND LOCAL AGENCIES AND ORGANIZATIONS TO
DISCUSS U.S. NUCLEAR REGULATORY COMMISSION'S ENVIRONMENTAL REVIEW
PROCESS FOR A PROPOSED LASER-BASED URANIUM ENRICHMENT
FACILITY NEAR WILMINGTON, NORTH CAROLINA

Location: North Carolina Department of Environment and Natural Resources (NCDENR),
Raleigh, North Carolina

Date: July 14, 2008

NCDENR

Staff: Dale Dusenbury, Manager, Emergency Response and Environmental Branch,
Division of Environmental Health, Radiation Protection Section

NRC Staff: Gloria Kulesa, Sr. Project Manager, Office of Federal and State Materials and
Environmental Management Programs (FSME), Division of Waste Management
and Environmental Protection (DWMEP), Environmental Review Branch (ERB)
Christianne Ridge, Sr. Project Manager, FSME/DWMEP/ERB

The purpose of this meeting was to share information about U. S. Nuclear Regulatory Commission and NCDENR's review processes related to General Electric—Hitachi's (GEH's) proposed construction and operation of a uranium enrichment facility on GEH's Wilmington, North Carolina site. NRC staff discussed NRC's licensing process, including the process NRC will use to prepare an Environmental Impact Statement (EIS) if GEH submits an application to construct and operate the proposed uranium enrichment facility. NRC staff provided slides describing NRC's environmental review process that were presented at a public meeting held in Wilmington on July 17, 2008 (Attachment 1).

Mr. Dusenbury indicated that the NCDENR Emergency Response and Environmental Branch (EREB) has responsibility both for reviewing site emergency plans and for monitoring environmental concentrations of radionuclides. With respect to emergency response, the group's primary responsibility is to advise the State Emergency Management Agency. In this capacity, EREB has provided comments to the State Emergency Management Agency regarding GEH's emergency plan for the proposed Global Laser Enrichment (GLE) facility. NCDENR staff provided contact information for the State Emergency Management Agency.

Mr. Dusenbury indicated that GEH had briefed his branch on their proposed enrichment facility, but that they did not specifically discuss emergency planning at that briefing. Mr. Dusenbury noted the chemical hazards associated with uranium hexafluoride (UF₆). NRC staff confirmed that the greatest hazard associated with the proposed facility is expected to be the chemical hazard associated with UF₆ rather than any radiological hazard.

With respect to environmental monitoring, Mr. Dusenbury indicated that NCDENR/EREB analyzes split samples of environmental media (e.g., air, groundwater) from various nuclear sites in North Carolina, including the Global Nuclear Fuels—Americas (GNF—A) Wilmington site that is co-located with the site of GEH's proposed enrichment facility. Mr. Dusenbury indicated that EREB does not have a regulatory role with respect to emergency plans or environmental monitoring, and that they work closely with the Radioactive Materials Branch of NCDENR, which does have a regulatory role. Mr. Dusenbury also indicated that NCDENR/EREB has a close working relationship with NRC Region II staff.

Enclosure

Action items: NRC staff will send Mr. Dusenbury NRC's docket numbers for GNF-A and for GEH's proposed laser enrichment facility. NCR staff will send Mr. Dusenbury the latest supplement to the environmental report for GNF-A.

Location: NCDENR, Morehead City, North Carolina

Date: July 15, 2008

NCDENR

Staff: Stephen Rynas, Federal Consistency Coordinator, Division of Coastal Management

NRC Staff: Gloria Kulesa, Christianne Ridge

The purpose of this meeting was to share information about NRC and NCDENR's review processes related to GEH's proposed construction and operation of a uranium enrichment facility on GEH's Wilmington, North Carolina site. NRC staff discussed NRC's licensing process, including the process NRC will use to prepare an EIS if GEH submits an application to construct and operate the proposed uranium enrichment facility. NRC staff provided slides describing NRC's environmental review process that were presented at a public meeting held in Wilmington on July 17, 2008 (Attachment 1).

This meeting focused on two topics related to the Federal Coastal Zone Management Act: (1) permitting requirements under the North Carolina Coastal Area Management Act (CAMA); and (2) Federal consistency reviews.

Mr. Rynas indicated that CAMA permits are required for development in Areas of Environmental Concern. NCDENR staff provided examples of development projects, including filling of wetlands, building bulkheads or pilings, or construction of buildings. Mr. Rynas indicated the Wilmington Regional Office of the NCDENR Division of Coastal Management would be responsible for identifying Areas of Environmental Concern. He also noted that activities causing a coastal effect are not limited to activities within a certain distance of the coast, but could include activities with downstream coastal effects. He indicated activities causing coastal effects also could include activities that affect coastal access or access to navigable waterways. Mr. Rynas advised that NRC's EIS should address whether or not the proposed action has a coastal effect.

Mr. Rynas indicated that a Federal consistency determination may be required if a CAMA permit is not required. A Federal consistency determination is used to determine whether a Federal action or action requiring a Federal license or permit is consistent with the CAMA. Mr. Rynas indicated that consistency with the CAMA requires consistency with various State requirements, including any necessary State permits for water quality, erosion and sedimentation control, or storm water management. NCDENR staff indicated a Federal consistency review would also address consistency with local land use plans. NCDENR staff provided brochures that provide submission guidance for North Carolina's Federal Consistency Certification pursuant to 15 CFR 930 Subparts C and D (Attachments 2 and 3).

Mr. Rynas indicated that, if a Federal consistency review is required, GEH would be required to submit a consistency certification to NCDENR's Division of Coastal Management. He indicated that GEH should submit its consistency certification with sufficient time for NCDENR to make a determination prior to NRC's licensing decision. However, he noted NRC should not expect GEH

to submit its consistency certification at the beginning of the EIS process because NCDENR may regard such a submission as premature. He also indicated that the Division of Coastal Management's review would be expected to last approximately 6 months.

Action items: None

Location: U.S. Army Corps of Engineers (USACE), Wilmington Regulatory Office

Date: July 16, 2008

USACE

Staff: Jennifer Fry, USACE
Keith Harris, Chief, Wilmington Regulatory Field Office, USACE

NRC Staff: Gloria Kulesa, Christianne Ridge

The purpose of the meeting was to discuss USACE's regulatory involvement with GEH's proposed uranium enrichment facility as well as NRC's licensing and environmental review process. NRC staff discussed NRC's licensing process, including the process NRC will use to prepare an EIS if GEH submits an application to construct and operate the proposed uranium enrichment facility. NRC staff provided slides describing NRC's environmental review process that were presented at a public meeting held in Wilmington on July 17, 2008 (Attachment 1).

Ms. Frye indicated that she had verified GEH's wetland delineation. She indicated that the site has a total of approximately 0.33 hectares [0.81 acres] of wetlands subject to Section 404 of the Clean Water Act (jurisdictional wetlands) and approximately 0.077 hectares [0.19 acres] of isolated wetlands. She noted that jurisdictional wetlands are regulated by USACE whereas isolated wetlands are regulated by the State of North Carolina and the U.S. Environmental Protection Agency rather than USACE.

USACE staff described two potential permitting mechanisms for projects that impact wetlands: (1) a national permit, which can be applied to projects that impact less than 0.2 hectares [0.5 acres] of jurisdictional wetlands and (2) an individual permit, which is required for projects that impact more than 0.2 hectares [0.5 acres] of jurisdictional wetlands. USACE staff noted that in exceptional cases, such as cases with significant public interest, USACE could require an individual permit for actions that would affect less than 0.2 hectares [0.5 acres] of jurisdictional wetlands.

USACE staff indicated that an individual permit would require USACE to perform an environmental review pursuant to the National Environmental Policy Act (NEPA). Mr. Harris indicated that the USACE may not be able to issue an individual permit to affect wetlands if NRC has not issued a license for the proposed enrichment facility because USACE would not be able to specify a purpose and need for the proposed activities that would impact jurisdictional wetlands in its environmental document required for an individual permit pursuant to NEPA. USACE staff also indicated that any necessary NCDENR Water Quality permit or Clean Air Act permits must be issued and a NCDENR Division of Coastal Management Federal Consistency Review must be completed before USACE could issue an individual permit allowing GEH to impact jurisdictional wetlands. USACE staff noted GEH could avoid the need for a permit from USACE by spanning wetlands with bridges rather than filling them.

USACE staff also noted that the Northeast Cape Fear River is a navigable water way but that USACE staff did not expect that any USACE permits related to the river would be needed because the proposed project area, as currently described to USACE by GEH, did not include the river or riverbanks. Mr. Harris recommended NRC staff contact the Chief of the Planning Division of the USACE Wilmington District to discuss potential USACE involvement with respect to the river and flood plain.

Mr. Harris suggested that USACE may want to be a cooperating agency in NRC's EIS. Ms. Frye suggested that NRC staff send her GEH's environmental report if NRC docket it to facilitate USACE's decision as to whether it should be a cooperating agency. USACE staff expressed interest in participating in the EIS scoping meeting NRC will hold if it docket GEH's application.

Mr. Harris suggested that the University of North Carolina, Wilmington (UNCW) may be a good source of local environmental information and provided contact information for an individual at UNCW.

Action items: NRC staff will send Ms. Frye GEH's environmental report if it is docketed by the NRC. NRC staff will alert Ms. Frye if NRC allows GEH to begin preconstruction activities related to GEH's proposed project without an NRC license.

Location: NCDENR, Wilmington Regional Office

Date: July 16, 2008

NCDENR

Staff: Dean Carroll, Permit Coordinator, Division of Air Quality
Chad Coburn, Senior Environmental Specialist, Division of Water Quality
Molly Ellwood, Southeastern Permit Coordinator, North Carolina Wildlife Resources Commission
Steven Everhart, District Manager, Division of Coastal Management
Rhonda Hall, Environmental Engineer, Division of Surface Water Protection
Ginny Henderson, Hydrogeological Technician, Division of Inactive Hazardous Sites
Cameron Weaver, Coordinator, One-Stop/Express Permitting
Linda Willis, Environmental Engineer, Division of Surface Water Protection

NRC Staff: Gloria Kulesa, Christianne Ridge

The purpose of the meeting was to discuss NCDENR's regulatory involvement with GEH's proposed uranium enrichment facility as well as NRC's licensing and environmental review process.

Mr. Weaver indicated the Division of Marine Fisheries elected not to send a representative to the meeting because the project did not appear to trigger Marine Fisheries involvement.

NRC staff discussed its licensing process, including its EIS preparation process. NRC staff provided slides describing NRC's environmental review process that were presented at a public meeting held on July 17, 2008, in Wilmington (Attachment 1).

NCDENR staff described North Carolina's process for completing environmental reviews pursuant to the State Environmental Protection Act (SEPA). Staff indicated that a SEPA review is required when a project receives support from the State of North Carolina. NCDENR Staff indicated that, in this case, State tax incentives granted to GE-Hitachi would appear to trigger a SEPA review. Staff indicated that, as part of a state SEPA review, the State "clearinghouse" would solicit comments from relevant NCDENR divisions to determine if applicable State regulations are met. NCDENR Staff provided contact information for the State clearinghouse.

Division of Water Quality (DWQ) staff noted that if USACE performs a review pursuant to Section 404 of the Clean Water Act to evaluate impacts on jurisdictional wetlands, NCDENR/DWQ would perform a Water Quality review pursuant to Section 401 of the Clean Water Act to evaluate impacts on isolated wetlands. Mr. Coburn indicated that an individual Water Quality Permit pursuant to Section 401 of the Clean Water Act could not be issued until the SEPA review, including all consultations required by the State clearinghouse, is complete. He also indicated that completion of the SEPA review would require that NRC's EIS be complete. However, he noted that impacts to less than 0.4 hectares [1 acre] of isolated wetlands could be permitted with a general permit, rather than an individual permit.

Division of Surface Water Protection (DSWP) Staff noted that a State Storm Water Permit could not be issued until DWQ had issued any necessary Water Quality Permits pursuant to Section 401 of the Clean Water Act. NCDENR staff indicated that General Electric has a State Storm Water Permit for the site and that they would need to modify the existing permit prior to emplacement of additional impervious surfaces on the site.

DSWP staff also noted that activities that disturb more than 0.4 hectares [1 acre] of land require a State Soil and Erosion Control permit, which is issued by the NCDENR Division of Land Quality.

DSWP staff indicated that General Electric has National Pollutant Discharge Elimination System (NPDES) permits for the site. DSWP staff indicated that Global Nuclear Fuels–Americas (GNF–A) had recently begun to recycle treated wastewater as process water. DSWP staff noted that although the sanitary wastewater treatment system had become a non-discharge system, General Electric had maintained its NPDES permit. DSWP staff noted that Division of Aquifer Protection involvement would be triggered if GEH proposes to send any new waste streams to the onsite wastewater treatment plant.

Division of Inactive Hazardous sites staff noted that there are existing trichloroethylene plumes on the site.

Mr. Carroll described the types of emissions the NCDENR regulates and indicated that hydrogen fluoride is designated by North Carolina to be a toxic air pollutant. Mr. Carroll also noted that GE-Hitachi's proposed project as currently described did not appear to trigger involvement of the NCDENR Division of Air Quality.

North Carolina Wildlife Resources Commission (NCWRC) Staff indicated that the NCWRC involvement would be triggered by the SEPA review.

The One-Stop Express Permitting Coordinator indicated he did not anticipate the involvement of the Division of Solid and Hazardous Waste but suggested NRC consult with the NCDENR Radiation Protection Section and the NCDENR Division of Solid and Hazardous Waste to clarify the appropriate NCDENR involvement with permitting storage of depleted uranium.

Action Items: None

Location: New Hanover County Offices, Wilmington, North Carolina

Date: July 16, 2008

New Hanover

County: Jennifer Braswell, Director, Community Conservation, New Hanover Soil & Water Conservation District
Sam Burges, Principal Development Planner, Planning Department
Wanda B. Coston, Community Development Planner, Planning Department
Jane Daughtridge, Senior Planner, Planning Department
James P. Iannucci, Chief Project Engineer, Engineering Department
Dennis Ihnat, Director, Engineering Department
Chris B. O'Keefe, Planning Director, Planning Department
Shawn Ralston, Senior Environmental Planner, Planning Department
Beth E. Wetherill, Erosion Control Engineer, Engineering Department
David F. Weaver, Assistant County Manager

NRC Staff: Gloria Kulesa, Christianne Ridge

The purpose of the meeting was to discuss New Hanover County's regulatory involvement with GEH's proposed uranium enrichment facility as well as NRC's licensing and environmental review process. NRC staff discussed its licensing process, including its EIS preparation process. NRC staff provided slides describing NRC's environmental review process that were presented at a public meeting held in Wilmington, North Carolina, on July 17, 2008 (Attachment 1).

Ms. Braswell provided background information about the New Hanover Soil & Water Conservation District (NHSWCD). She clarified that the NHSWCD is not part of New Hanover County's government and is funded by the U.S. Department of Agriculture and NCDENR. She indicated that the NHSWCD often is involved with storm water management projects, but that New Hanover County issues permits and performs inspections. She indicated NHSWCD also helps organizations coordinate any necessary North Carolina Coastal Area Management Act (CAMA) permits and is sometimes involved with conservation through land acquisition. Ms. Braswell provided contact information for individuals in the Division of Soil and Water Conservation, NCDENR, and Cape Fear Resource Conservation & Development, Inc.

Ms. Braswell noted that an individual had recently visited the Engineering Office to view aerial photos of the site and surrounding areas to locate a family cemetery. No further clarification on the location of the cemetery (i.e., on or near the site) was possible at the time. NRC staff later confirmed with GEH staff that GEH staff is aware of a cemetery on site and that the cemetery is not within the proposed project area.

Mr. O'Keefe indicated that county emergency planning staff were interested in the project but were unable to attend the meeting. Mr. O'Keefe provided contact information for county emergency planning staff.

Mr. O'Keefe noted that the county is urbanizing rapidly, and indicated it was not clear to him why GEH would elect to place a uranium enrichment facility in a rapidly urbanizing area. NRC

staff indicated it was not a proponent of the project or the site. NRC staff also indicated that the proposed site for the enrichment facility was the site of an existing fuel fabrication facility. NRC staff provided an overview of uranium enrichment and fuel fabrication, and indicated that the hazards associated with the proposed facility were similar to the hazards associated with the existing fuel fabrication facility. NRC staff indicated the main risk from the facility was expected to be the chemical hazard associated with uranium hexafluoride (UF₆).

Mr. O'Keefe asked whether the main form of transportation of UF₆ to and from the facility was expected to be rail or truck. NRC staff indicated that information would be included in GEH's environmental report, which it had not yet received, and that it would be discussed in the draft EIS.

NRC staff indicated that other effects on traffic, including any impacts caused by additional workers at the site, would also be addressed in the EIS. Mr. Ihnat and Mr. O'Keefe indicated that traffic near the proposed site currently was heavy only during plant shift changes. Ms. Daughtridge indicated that if the proposed development would generate more than 100 peak-hour trips per day, GEH would be required to perform a Traffic Impact Analysis (TIA). She also noted that if a TIA is required, the State Department of Transportation and the Wilmington Urban Area Metropolitan Planning Organization would need to concur before New Hanover County would grant a building permit.

Mr. O'Keefe indicated that the site currently is zoned for heavy industry and provided contact information for the Chief Zoning Officer in the Inspections Department. NRC staff asked whether there were any zoning or physical characteristics of the area to the north of the western half of the site that would prevent development. Mr. O'Keefe noted that approximately 1820 hectares [4500 acres] in that area were privately held and referred to as the Sledge Property. Department of Planning staff indicated that the land currently is zoned as "Rural Agricultural" (RA) land, which requires a minimum lot size of one acre and noted that much of the land in the area is within the 100 year flood plain. Department of Planning (DP) staff indicated that neither the RA zoning nor the flood plain would prevent residential development of the land. Staff noted that they believed timber had previously been harvested from the site but was no longer being harvested from the site.

DP staff noted that there are 2 communities proposed to be built south of the GE site, but none currently proposed to be built to the north. Planning staff noted that the larger of the two communities would include 630 lots and the smaller would include fewer than 100 lots.

DP staff indicated that the School Board does its own facility planning but that its budget is approved by the County. Planning staff also noted that a new elementary and middle school is being built near Holly Shelter Road.

DP staff asked about emergency planning for the proposed facility. NRC staff indicated that as part of its licensing process, NRC would review GEH's emergency plan. NRC staff indicated that NRC would expect GEH's emergency plan to be coordinated with New Hanover County. NRC staff also indicated that the potential effects of accidents would be addressed in the EIS.

Ms. Wetherill noted that a County Sedimentation and Erosion Control permit would be required for any activity that disturbed more than one acre of land and provided an application for a Permit for a Land Disturbing Activity (Attachment 4) and accompanying guidance (Attachment 5). Department of Engineering staff noted that the county permit would not be

contingent on completion of NRC's EIS, but would be contingent on related permits issued by the USACE.

Mr. Weaver noted that groundwater resources are of concern to the County. New Hanover County staff noted that groundwater consumptive use is governed by the county and effects on groundwater quality are regulated by the State of North Carolina.

Mr. O'Keefe noted that no North Carolina Natural Heritage areas, which are identified based on the presence of threatened and endangered species, appeared to incorporate any part of the proposed site.

Department of Engineering Staff noted that the county requires additional stormwater permits beyond what the State of North Carolina requires. Mr. Iannucci indicated that, because the proposed site already has more than 930 square meters [10,000 square feet] of impervious surfaces, addition of any additional impervious surface would require a county permit. Mr. Iannucci also suggested NRC staff should contact the Cape Fear Water and Sewer Authority.

Department of Planning staff asked if any security requirements of the proposed facility would limit recreational access (e.g., boating) to the river near the site. NRC staff responded that they did not believe there would be any restrictions because the proposed location of the facility was not immediately adjacent to the river. NRC staff also noted that this type of issue would be addressed in the EIS.

In response to questions from NRC staff, New Hanover County staff suggested that NRC staff may want to contact the Cape Fear Arch Conservation Collaborative, Cape Fear Resource Conservation and Development, Inc., and the Wilmington district office of the Nature Conservancy.

Action Items: None

Location: Cape Fear River Watch (CFRW) Offices, Wilmington, North Carolina

Date: July 17, 2008

CFRW

Staff: Doug Springer, Executive Director and Riverkeeper, CFRW

NRC Staff: Christianne Ridge

The purpose of the meeting was to discuss NRC's licensing and environmental review process and to gather information about CFRW and its concerns related to GEH's proposed enrichment facility.

NRC staff clarified that NRC is not affiliated with or working for GEH, and is not a proponent of GEH's proposed facility. Staff indicated that NRC is a regulatory agency and that GEH would require a license from NRC to operate the proposed facility and to construct certain parts of the facility. NRC staff described its environmental review process, highlighting opportunities for public involvement. NRC staff also provided slides describing NRC's environmental review process that were presented at a public meeting held in Wilmington, North Carolina, on July 17, 2008 (Attachment 1).

Mr. Springer provided a brief history of the Waterkeeper Alliance. He noted that the Waterkeeper Alliance is an international organization. He also noted that North Carolina has 13 Riverkeepers, which is more Riverkeepers than any other state has. Mr. Springer indicated that CFRW is an advocate for the Cape Fear River Basin, and that its three primary roles are advocacy, education, and action. He also indicated that CFRW serves as a clearinghouse for other environmental groups.

Mr. Springer noted that some rivers in Russia have become dangerous to use for transportation because of radioactive contamination. NRC staff acknowledged his concern and explained the radiological difference between high-level waste and the depleted uranium waste that would be generated by GEH's proposed facility. NRC staff indicated that the primary hazard associated with the facility is expected to be the chemical hazard posed by UF₆. NRC staff indicated that General Electric has approximately 40 years of experience managing UF₆ at the existing fuel fabrication facility on the proposed site.

Mr. Springer indicated that his primary focus when considering GEH's proposed project will be any emissions into the river and any transportation on the river associated with the facility. Mr. Springer asked whether GEH planned to use the river for transportation of materials to and from the site. NRC staff indicated that our current understanding is that GEH does not intend to use the river for transportation of materials. NRC staff indicated that additional information on this issue would be available in GEH's environmental report, which NRC has not yet received, and that this issue would be addressed in NRC's EIS.

Mr. Springer asked about waste streams from the proposed facility. NRC staff indicated that the primary waste stream from the facility is expected to be solid depleted UF₆ that would be stored in cylinders on site. NRC staff indicated that the cylinders may be stored on site for several years and that the U.S. Department of Energy (DOE) would have ultimate responsibility for taking possession of the cylinders. Mr. Springer asked why GEH would be permitted to store cylinders of depleted UF₆ on site for several years. NRC staff indicated that DOE has stored depleted UF₆ in the same type of cylinders safely for decades. Mr. Springer expressed concern that DOE may not take possession of the cylinders. Mr. Springer asked about liquid waste streams that would enter the Northeast Cape Fear River. NRC staff stated that GEH has indicated that process effluents from the proposed facility would be disposed using the site's existing NPDES permit. NRC staff also indicated that more detailed information would be available when GEH submits its environmental report and that any discharges into the river would be addressed in NRC's EIS.

Mr. Springer noted that the Cape Fear River is ecologically fragile. He indicated that the Cape Fear River is hydrologically connected to the Castle Hayne aquifer and that there are fish hatcheries near springs where the aquifer outcrops into the river. Mr. Springer also noted that he has observed porpoises swimming in the Cape Fear River. He noted that the expected emission of mercury from the proposed Titan Cement facility near Castle Hayne is particularly troublesome because the river already is listed as an impaired water body with respect to mercury pursuant to Section 303 of the Clean Water Act.

NRC staff indicated that GEH may request permission to begin non-safety related construction activities (e.g., construction of administrative buildings) without an NRC license and that it is currently not known if NRC would approve such a request. Mr. Springer expressed concern that construction of part of the facility would put pressure on NRC and other regulators to approve licenses and permits to allow GEH to complete construction and operate the facility. NRC staff indicated that any construction would be performed by GEH at the company's risk and that NRC would not approve a license unless the facility met its safety and security requirements.

Mr. Springer asked how much GEH planned to increase the developed footprint of the site. NRC staff indicated that its current understanding is that the developed footprint could increase by more than one hundred acres, and that a more precise estimate would be available once GEH submits its environmental report. Mr. Springer suggested that GEH should establish a conservation area near the river.

Mr. Springer suggested that NRC staff may want to contact the Cape Fear Coastal Federation, the Sierra Club, Pender Watch, and StopTitan.org.

Action Items: NRC staff will provide links to the NRC's webpage related to GEH's proposed facility.

Docket No.: 70-1116

Attachments:

1. Presentation of NRC's Environmental Review Process
2. North Carolina Federal Consistency Determination Submission Guidance (Subpart "C" 15 CFR 930)
3. North Carolina Federal Consistency Certification Submission Guidance (Subpart "D" 15 CFR 930)
4. New Hanover County Application for Permit for a Land Disturbing Activity
5. New Hanover County Memorandum Re: Land Disturbing Permits and Requirements