

Permit No.	Scan Date	DIN
1809-INDUS- 1812-INDUS-2008	June 4, 2015	24465

526 South Church St.
Charlotte, NC 28202



RECEIVED
June 4, 2015
Solid Waste Section
Asheville Regional Office

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Mail Code EC13K
Charlotte, NC 28201-1006
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June 4, 2015

North Carolina Department of Environmental and Natural Resources
Division of Waste Management
Solid Waste Section
2090 U.S. Highway 70
Swannanoa, North Carolina 28778

Attn: Mr. Larry Frost

Re: Request to Permit Waste for Disposal
Marshall Steam Station Operational Landfills (Permit No. 1809-INDUS and 1812-INDUS)
Catawba County, North Carolina

Dear Mr. Frost,

Under the Coal Ash Management Act of 2014 (CAMA), 130A-309.224 Section 3(b), Duke Energy has been ordered to remove coal combustion product (CCP) material from the Riverbend Steam Station. In order to meet the regulatory high priority closure requirement of August 1, 2019, CCP material must move from Riverbend Steam Station at the earliest date and most efficient method possible. The Riverbend Steam Station stormwater permit received on May 15, 2015 allowing CCP material to be removed from the facility. The longterm goal for CCP disposal from Riverbend Steam Station is placement as re-use material in the Chatham and/or Lee County mines transported via rail system. Currently the intended mine facilities are pending permit approval. Due to the restricted time line for CCP removal set forth by CAMA, Duke Energy has explored alternative disposal facilities. The Duke Energy Marshall Steam Station has been determined to be a viable option for Riverbend Steam Station CCP disposal. Current transport of CCP material from Riverbend to R&B Landfill in Homer, GA enables disposal trucks to carry one load per day. The vicinity of Marshall Steam Station to Riverbend will allow less road time enabling transport trucks to complete a planned five trips per day.

As a follow up to the Duke Energy Corporate Waste for Disposal request sent to the NCDENR Division of Solid Waste on May 14, 2015, Duke Energy requests immediate approval for receipt of CCP material from the Duke Energy Riverbend Steam Station located in Gaston County at the Marshall Steam Station operational landfill facilities:

- 1812-INDUS Marshall Steam Station Industrial Landfill #1
- 1809-INDUS Marshall Steam Station FGD Landfill

CCP material from Riverbend Steam Station is expected to consist mostly of stacked fly and bottom ash. Future hauling may include ponded ash. The CCP disposal material may contain incidental amounts of stone, soil, and coal.

The currently planned hauling efforts consist of approximately 50 loads per day with initial hauling at a lower rate while the process is established. The number of daily loads may increase as the project progresses. CCP loads will be moistened as needed to prevent dusting. Truck loads will be weighed to

ensure Department of Transportation compliance and covered with a tarp for prevention of airborne particles during transport and proceed through a wheel wash station prior to leaving the Riverbend Steam Station property as well as following unloading at Marshall.

An initial primary route was established based on lowest impact to surrounding communities, congestion reduction, school zone locations, and constant travel rates.

The initial proposed primary travel route consists of:

- Turn right onto Horseshoe Bend Beach Road [\approx 930 ft]
- Turn right onto NC-16 N [15.6 miles]
- Take NC 150 exit towards Lincolnton/Mooresville [0.3 miles]
- Turn right onto NC-150 E [7.1 miles]
- Turn left at Kiser Island Road [0.2 miles]

The proposed Emergency Alternate Route consists of:

- Turn right onto Horseshoe Bend Beach Rd [\approx 930 ft]
- Turn right onto NC-16N [12 miles]
- Turn Right onto St. James Church Rd [1.3 miles]
- Continue onto Will Proctor St. [0.5 miles]
- Turn right onto Campground Rd [2.1 miles]
- Continue onto Slanting Bridge Rd [2.3 miles]
- Turn right onto NC-150 E [1.7 miles]
- Turn left at Kiser Island Rd [0.2 miles]

Should either route need to be altered, new routes will be reviewed based on initial review criteria.

Receipt of solid waste material will comply with waste types listed in Section 2.1.2 - Waste Acceptance, Disposal, and Screening Requirements of the Marshall Steam Station approved Operations Plans. Duke Energy proposes to revise Section 2.1.2 of each facility's Operations Plan to include waste generated by Riverbend Steam Station during the next permit amendment or modification.

Duke Energy is committed to excellent environmental stewardship and cooperation with the Division regarding the operation, maintenance, safety, and integrity of all of its facilities. We look forward to continuing to work with you regarding environmental concerns.

If there are any questions regarding this request, please contact me at (336) 215-4576.

Respectfully submitted,



Kimberlee Hutchinson, PE
Environmental Services

Cc: Ed Mussler - NCDENR Division of Solid Waste
Ed Sullivan - Duke Energy
Richard Baker - Duke Energy
Harry Sideris - Duke Energy