

Permit No.	Scan Date	DIN
3612-INDUS-2008	July 27, 2015	24782

526 South Church St.
Charlotte, NC 28202

P.O. Box 1006
Mail Code EC13K
Charlotte, NC 28201-1006
336-215-4576
704-382-6240 fax



RECEIVED
July 27, 2015
Solid Waste Section
Asheville Regional Office

July 26, 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 Vacuum Waste for Disposal
Allen Steam Station Operational Landfill
(Permit No. 3612-INDUS)
Gaston County, North Carolina

Dear Mr. Frost,

Duke Energy would like to establish guidelines in the Allen Steam Station Solid Waste facility Permit to Operate related to the vacuum truck waste types and placement methods within the active landfill operational limits. Attached you will find the proposed procedure for placement of vacuum waste at the operational landfill. A variance request to the Permit to Operate for the following Allen Steam Station landfill facility, along with the corresponding Permit to Operate identification, is listed below:

- 3612 - INDUS Allen Steam Station Retired Ash Basin Landfill

Receipt of solid waste material at the facility will comply with waste types listed in Section 2.1.2 - Waste Acceptance, Disposal, and Screening Requirements of respective facility's approved Operations Plan. Duke Energy proposes to update the facility's Operations Plan to include Vacuum Waste in Section 2.1 - Waste Handling and Sequencing 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
Shawn McKee - NCDENR Division of Solid Waste
Ed Sullivan - Duke Energy
Richard Baker - Duke Energy
Sean DeNeale - Duke Energy

VACUUM WASTE DISPOSAL PROCEDURE



ALLEN STEAM STATION **Gaston County, North Carolina**

July 26, 2015

1.0 BACKGROUND

As part of on-going plant operations at the Duke Energy active CCP landfills, vacuum trucks are used to remove waste materials from the plant areas that consist of various permitted coal combustion products (CCP). The origin of the vacuum truck waste materials is typically from various sumps, catch basins, wheel wash stations, and coal pile sumps located within the plant.

The moisture contents of the vacuum truck waste materials may vary considerably with the waste varying in consistency from a relatively dry state to a wet, fluid-like state depending on the amount of liquid present in the sumps or vacuumed areas. This appendix serves as guidelines in the Permit to Operate related to the vacuum truck waste types and placement methods within the active CCP landfill operational limits. A variance request to the Permit to Operate for the Allen Steam Station operational landfill facility, along with corresponding Permit to Operate identification, is listed below:

Summary of Active Allen Steam Station Industrial Landfill Permit

Station	Landfill	Permit ID
Allen	Retired Ash Basin Landfill Facility	3612-INDUS

CCP material transported via vacuum truck will occur in a vacuum truck dedicated to Duke Energy operations or documentation will be obtained to ensure that the vacuum truck contains no human or other non-permitted waste streams. Vacuum truck waste could also mean similar waste material transported in smaller water tight units.

2.0 OPERATIONS PLANS MODIFICATION REQUEST

The following modifications are requested to the Operations Plan for the active Duke Energy CCP landfill facility listed above. The vacuum truck waste materials will be limited to those permitted waste streams that are currently approved in the Permit to Operate for the landfill facility. The following guidelines are proposed to be added to the landfill Operations Plans:

Vacuum Truck Waste

Vacuum truck waste shall consist of permitted waste materials as described in the Operation Plan for the active landfill.

Non-permitted waste materials inadvertently included with the vacuum truck waste including but not limited to yard trash (paper, plastic, wood, aluminum, styrofoam, etc.) shall be visually screened and immediately removed from the vacuum truck waste after the waste material is dumped in the operational area by vacuum contractor as outlined in the Vacuum Truck Waste Disposal Log.

The consistency of the vacuum truck waste may vary from a relatively dry state to a relatively wet, fluid-like state. Vacuum truck waste material shall be moisture conditioned by initial decanting excess moisture from the waste or by mixing the waste with fly ash, bottom ash, or

gypsum materials depending on its consistency. The vacuum truck waste shall be placed and spread in maximum 6-inch lifts near the center of the operational area. The vacuum truck waste shall not be placed within 50 feet horizontally from exterior landfill slopes or within 50 feet of chimney drain structure locations. The vacuum truck waste material shall be thoroughly mixed with fly ash, bottom ash, or gypsum material during waste placement using a dozer or other similar grading equipment to provide additional moisture conditioning prior to compaction. In-place density testing of the vacuum truck waste materials is not required.

Vacuum truck waste shall only be placed within the landfill during landfill operating hours when landfill operator personnel are present. The vacuum contractor shall coordinate vacuum truck waste placement with landfill operator personnel.

A Vacuum Truck Waste Disposal Log shall be used to document vacuum waste placement within the landfill.

Dust control measures shall be provided for the vacuum truck waste in accordance with the Dust Control Plan.

3.0 VACUUM TRUCK WASTE DISPOSAL LOG

A Vacuum Truck Waste Disposal Log is attached, and shall be used to verify the origin of vacuum truck waste and will include the date, time, weather conditions, estimated waste volume, visual waste screening and non-permitted waste removal, and Operator representative approval. The Vacuum Truck Waste Disposal log may be modified as needed by the Owner or Operator to provide additional site specific operations information.

The estimated volume of vacuum truck waste generated will be documented by the landfill operator along with monthly truck scale log records to estimate the cumulative vacuum truck waste transported and placed within the landfill.

