



Permit No.	Scan Date	DIN
3612-INDUS-2008	September 19, 2016	26763

526 South Church Street:
Mail Code EC13K
Charlotte, North Carolina 28202
704-382-4761

RECEIVED
September 22, 2016
Solid Waste Section
Asheville Regional Office

September 19, 2016

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

Attn: Mr. Larry Frost

Re: Retired Ash Basin (RAB) Ash Landfill Compaction Modification Request
Permit No.: 3612-INDUS
Allen Steam Station
Gaston County
Belmont, North Carolina 28012

Dear Mr. Frost,

As discussed via phone conversation on September 7, 2016, Duke Energy requests approval for modification to the intermediate cover compaction specification for exterior slopes at Allen Steam Station's RAB Ash Landfill (Permit No. 3612-INDUS). The requested modifications are to revise the minimum compaction requirement for intermediate cover soil from 95 percent of Standard Proctor (ASTM D 698) maximum dry density to 90 percent and to revise the moisture content for intermediate cover soil from within 5 percent to within 3 percent of the material's optimum moisture content; this requirement is found in Section 2.3 of the *Operations Quality Assurance Plan* located in the *Operations Plan – Revision 7, Duke Energy Carolinas, LLC – Allen Steam Station, Retired Ash Basin (RAB) Ash Landfill – Phase 1, Permit No. 3612, Gaston County, Belmont, North Carolina*. The requested modifications to this section are shown below by an underline.

2.3 QA Field Testing

QA field testing shall be performed to monitor the compaction and moisture conditioning during waste placement. Waste shall be compacted to a minimum 95 percent of its Standard Proctor (ASTM D 698) maximum dry density, and intermediate cover soil shall be compacted to a minimum 90 percent of its Standard Proctor (ASTM D 698) maximum dry density. Compacted moisture content of waste shall be within 5 percent of the material's optimum moisture content, and compacted moisture content of intermediate cover soil shall be within 3 percent of optimum moisture content as determined by ASTM D 698.

Duke Energy proposes to revise this section of the Operations Plan to include the above requested modifications during the next Permit amendment or modification. If there are any questions regarding this request, please contact me at (704) 382-4761.

Respectfully Submitted,

A handwritten signature in black ink that reads "Sean DeNeale". The signature is written in a cursive style with a large, stylized 'S' and 'D'.

Sean DeNeale

Environmental Services

Cc (via e-mail): Ed Mussler, NCDEQ

Kyle Baucom, Duke Energy
Scott Harris, Duke Energy