



North Carolina Department of Environment and Natural Resources

Division of Waste Management

Dexter R. Matthews
Director

Beverly Eaves Perdue
Governor

Dee Freeman
Secretary

November 9, 2011

Mr. Ed Sullivan, P.E.
Mail Code EC13K
PO Box 1006
Charlotte, NC 28201

RE: Monitoring Well MS-8 and SW-1 Assessment
Duke Energy – Marshall Steam FGD Landfill
Permit #18-09
Catawba County
DOC ID 15490

Dear Mr. Sullivan:

A review of groundwater analytical data from the FGD Landfill indicates exceedances of groundwater standards established in 15A NCAC 2L .0202 (2L Standards) during the March 22, 2011 monitoring event. Chromium and iron have been reported at concentrations greater than the 2L Standards in groundwater samples collected from MW-8, while iron and manganese have concentrations above 2L in SW-1, which has been determined to be a groundwater seep. Monitor well MW-8 appears to be located at the compliance boundary. Industrial landfills are required to comply with the 2L standards at the compliance boundary in accordance with 15A NCAC 13B .503 (2)(d)(iv).

Duke Energy shall acquire the services of a North Carolina licensed professional geologist and submit a groundwater assessment work plan to the Solid Waste Section (Section) outlining how the reported metals contamination in MW-8 will be delineated. The Section will review the submitted work plan, approve, or request additional information or amendments before implementation. Please submit this work plan within 90 days of receiving this letter. The work plan may include, but not limited to an alternate source demonstration for the metals contamination. In addition, monitoring wells MS-10, MS-15 and MS-6 have chromium and iron concentrations above their respective 2L Standards and appear to be located at the review boundary, which triggers the need for assessment.

The Section solicits your cooperation and would like to remind you that it is your responsibility to comply with the requirements of the rules and statues since the rules are self-implementing. Please contact me at (919) 707-8253 or via email Elizabeth.werner@ncdenr.gov if you have any questions or concerns regarding this letter. Thank you in advance for your anticipated cooperation in this matter.

Sincerely,

Elizabeth S Werner
Hydrogeologist

cc: William M. Miller, PE, Altamont Environmental Inc.
Mark Poindexter, SWS Ellen Lorscheider, SWS
Jason Watkins, SWS Deb Aja, SWS
Central File