

Werner, Elizabeth

From: Werner, Elizabeth
Sent: Monday, November 28, 2011 12:52 PM
To: 'Andrew Moore'
Subject: RE: Marshall Steam Station FGD Landfill, Permit No. 1809, Reporting Nitrate vs. Nitrate as Nitrogen

Mr. Moore,

Thank you for your email. The Solid Waste Section approves Duke's request of reporting Nitrate (as N) during their semi-annual monitoring events. Please let me know if you have any more questions or concerns.

Have a great day.

Sincerely,
Elizabeth Werner

From: Andrew Moore [<mailto:amoore@altamontenvironmental.com>]
Sent: Monday, November 28, 2011 12:44 PM
To: Werner, Elizabeth
Cc: Bill Miller; Hunsucker, Tim; desulliv@duke-energy.com
Subject: Marshall Steam Station FGD Landfill, Permit No. 1809, Reporting Nitrate vs. Nitrate as Nitrogen

Ms. Werner,

Altamont Environmental, Inc. is currently in the process of drafting the semiannual groundwater monitoring report for the Marshall Steam Station FGD Landfill, Permit No. 1809 on behalf of Duke Energy Carolinas, LLC. The recently approved *Groundwater Sampling and Analysis Plan*, dated August 19, 2011 (attached), for the FGD Landfill lists Nitrate as one of the parameters to be reported.

For the reasons listed below, Altamont requests that we report the results of Nitrate (as Nitrogen, N) rather than reporting Nitrate:

- T15A NCAC 2L .0202(g) Class GA groundwater standards lists a standard for Nitrate (as N) of 10 mg/L. However, no standard is listed for Nitrate.
- The Solid Waste Section's Constituent Look-up webpage (accessed here <http://portal.ncdenr.org/web/wm/sw/envmonitoringlist>) does not have an entry for Nitrate. The Constituent Look-up webpage lists only Nitrate (as N) and Nitrate/Nitrite combined.

In order to compare the results of Nitrate analyses for the Marshall Steam Station FGD Landfill to SWSL and 2L standards, Altamont and Duke request that we report Nitrate (as N) rather than Nitrate.

Would reporting Nitrate (as N) for the abovementioned landfill, and comparing the results to SWSL and 2L standards, rather than reporting Nitrate, be acceptable to yourself and the Solid Waste Section?

Thank you for your help in addressing these issues.

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