FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

UNIT TYPE:												
Lined MSWLF		LCID		YW		Transfer		Compost		SLAS		COUNTY: Gaston
Closed MSWLF		HHW		White goods		Incin		T&P		FIRM		PERMIT NO.: 36-12
CDLF		Tire T&P / Collection		Tire Monofill		Industrial Landfill	X	DEMO		SDTF		FILE TYPE: COMPLIANCE

Date of Audit: November 12, 2010 & November 18, 2010 **Date of Last Audit:** February 8, 2010

FACILITY NAME AND ADDRESS:
Allen Steam Station, Retired Ash Basin (RAB) – Ash Landfill
253 Plant Allen Road
Belmont, North Carolina 28012

GPS COORDINATES: N: 35.18339 **W:** 81.01119

FACILITY CONTACT NAME AND PHONE NUMBER:
Don Scruggs (704) 829-2423

FACILITY CONTACT ADDRESS:
253 Plant Allen Road
Belmont, North Carolina 28012

AUDIT PARTICIPANTS:
Chris Ussery, Duke Energy
Don Scruggs, Duke Energy
Emily Simon, Duke Energy
Jeff Newell, Duke Energy
Joe Thames, SEFA Group
Kevin Cornish, SEFA Group
Charles Gerstell, NCDENR-Solid Waste Section

STATUS OF PERMIT:
A Permit to Operate Allen Steam Station, Retired Ash Basin (RAB) – Ash Landfill Phase 1 – Cell 1 was issued on December 9, 2009 and expires December 9, 2014.

A Permit to Construct Allen Steam Station, Retired Ash Basin (RAB) – Ash Landfill Phase 1 – Cell 2 was also approved on December 9, 2009 and expires September 2, 2013.

PURPOSE OF AUDIT:
Comprehensive Audit

NOTICE OF VIOLATION(S):
None

You are hereby advised that, pursuant to N.C.G.S. 130A-22, an administrative penalty of up to $15,000 per day may be assessed for each violation of the Solid Waste Statute or Regulations. For the violation(s) noted here, you may be subject to enforcement actions including penalties, injunction from operation of a solid waste management facility or a solid waste collection service and any such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules.

STATUS OF PAST NOTED VIOLATIONS:
None

AREAS OF CONCERN AND COMMENTS:

1. This inspection was performed to observe the first application of Gorilla Snot as part of the approved Demonstration Project to determine effectiveness of the proposed alternative cover material.
2. The Facility is currently accepting approximately 1,192 tons of waste per day.
3. Gates have been provided at Plant Allen Road to prevent un-authorized entry into the facility.
4. A sign has been posted at the entrance to the landfill as outlined in the approved Operations Plan.
5. The Permit to Operate and the Operations Plan were current and available for review.
6. All haul roads were maintained in good condition.
7. A water truck was being utilized at the time of inspection for dust control.
8. A tire wash station has been provided at the entrance to the site to remove ash from wheels of landfill traffic.
9. No ash was being placed within the landfill at the time of inspection.
10. The working face was less than 2 acres at the time of inspection.
11. Inactive areas were being covered with adequate earthen material.
12. Edge of liner markers were being maintained.
13. Cell 2A has been constructed and stabilized with groundcover. Cell 2B has been constructed and is covered with a rain guard.
14. Erosion and sedimentation control measures were being maintained in good condition.
15. No unacceptable waste streams were observed within the landfill at the time of inspection.
16. Three gallons of liquid was detected by the Leak Detection System since the previous inspection. Mr. Ussery stated that he felt this was a result of testing the pumps.
17. Gas monitoring was performed on November 10, 2010. No gas levels were detected.
18. Certified Landfill Operations Specialists:
    - Jeffery W. Newell (expires 5/4/12)
    - Don Scruggs (expires 5/4/12)
    - Joe Thames (expires 2/8/11)
    - Chris L. Ussery (expires 5/4/12)
    - Daniel Woody (expires 5/4/12)
19. Alternative Cover Demonstration:
    - An application area was prepared measuring approximately 21,000-square feet in size.
    - 500 gallons of Gorilla Snot and water was mixed together for application.
    - The material was applied using a mechanical sprayer pulled by an SUV.
    - Application of the material took approximately 20 minutes.
    - Mr. Ussery stated that the material would take approximately 72 hours to cure depending upon weather conditions.
    - Upon application of the Gorilla Snot, a moderate, septic type odor was observed. Ms. Simon confirmed that the sprayer used to apply the material was cleaned multiple times. During future applications, be sure to monitor the presence and severity of the odors and the time it takes for the odors to disperse.
    - Once applied, the demonstration area was marked with stakes and caution tape.
    - A follow-up visit was performed on November 18, 2010 to re-observe the application area.
        - No dust was observed and it appeared the Gorilla Snot had created a paper thin coating on the surface of the ash.
        - No odors were observed within the application area.
        - During the visit to the facility, Mr. Suggs and I made observed the container of Gorilla snot and confirmed that the odor of the material was consistent with the odor that was experience during the application of the proposed alternative cover material. As previously stated, be sure to monitor the presence and severity of odors during future applications and the time it takes for any odors to disperse.

Please contact me if you have any questions or concerns regarding this audit report.

Charles T. Gerstell
Environmental Senior Specialist
Regional Representative

Phone: (704) 235-2144.

Delivered on : 11/19/10 by	X	Electronic Correspondence		US Mail		Certified No. [ ]

Cc: Mark Poindexter, Field Operations Branch Supervisor
Deborah Aja, Western District Supervisor