



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

February 4, 2008

Mr. Glenn W. Outland
Roanoke Valley Energy Facility
P.O. Box 351
Weldon, North Carolina 27890

Subject: Notification - Coal Ash Structural Fill
O.N. Vaughan Property at 4752 Highway 301
Halifax, NC
Halifax County

Reference: Coal Ash Structural Fill Site License Application dated November 2007, received by the Solid Waste Section on November 19, 2007

Dear Mr. Outland:

The Solid Waste Section (Section) has reviewed the Structural Fill Facility Permit Application dated November 2007 submitted by URS Corporation. The application meets all of the requirements specified in Section .1700 of the North Carolina Solid Waste Management 15A NCAC 13B Rules. This notification includes the following information as required by Rule .1703:

1. **Nature, Purpose and location of the project:** This project proposes to place 64,000 cubic yards of coal ash from the Roanoke Valley Energy Plant as structural fill to reclaim a 6-acre soil borrow pit near its original topography for the use of pasture land. The borrow pit is a licensed mining site within a 224-acre piece of property owned by O.N. Vaughan.

Quad sheet: Weldon, NC: 63.3708 N Lat; 77.959 W Long

2. **Estimated start:** When approved by the Section
- Estimated completion:** September 2008
3. **Estimated volume:** 64,000 cubic yards
4. **TCLP analysis from coal ash:** included in application
5. **Signed statement from the owner:** Otis N. and Judith Vaughan, the property owners, signed a statement that they acknowledge and consent to the use of coal combustion by-products as structural fill dated November 9, 2007.

6. **CCB generator:** Roanoke Valley Energy Plant
Location of generating plant: 290 Power Place, Weldon, NC
Mailing address: PO Box 351, Weldon, NC 27890
Contact: Glenn Outland
Telephone number: (252) 536-3200 x246
Statement that notification will be given to DWM if changes are to occur.

Construction may now begin on this project.

However, there are a few areas of concern the the Section wishes to inform you of and which are listed below.

- Rule .1704(a)(3) states the bottom of the structural fill must be at least two feet above the seasonal high groundwater table. In the application, it was shown that the water table is 2.8 feet below ground surface in some sections of the desired fill area. This meets the above stated rule, but these groundwater measurements were taken during a severe drought. When the groundwater table rebounds, the water table will possibly be less than two feet from the bottom of the structural fill and even intersect with the structural fill at certain areas. The Section suggests using native soil to raise the bottom of the desired fill area at least one foot.
- TCLP analysis results are typically indicative of what will leach into the groundwater. According to the TCLP analytical results stated in Appendix D of the application, there are several metals that would be above 2L Standards, specifically boron, iron, manganese, mercury, selenium and silver. The Section suggests installing groundwater monitoring wells downgradient of the desired fill area.

During the construction process, North Carolina Solid Waste Management 15A NCAC 13B Rules .1701, .1702, .1704, .1705, .1706, .1707, .1708, .1709, and .1710 shall also be adhered to.

If you have any questions or concerns, please contact myself at (919) 508-8495 or Elizabeth Werner via email elizabeth.werner@ncmail.net or phone at (919) 508-8512.

Sincerely,

Ed Mussler
Permitting Branch Supervisor
Solid Waste Section

Cc: Richard K. Lowe – URS
O.N. Vaughan – property owner
Mary Whaley – SWS
Elizabeth Werner - SWS