



**G.N. RICHARDSON & ASSOCIATES**  
Engineering and Geological Services

4204  
HALIFAX

Correspondence

May 28, 2004

Mr. Jim Barber  
Branch Head  
NC DENR - DWM - Solid Waste Permitting  
401 Oberlin Road, Suite 150  
Raleigh, NC 27605



**RE: Acceptance of Coal Fines  
Halifax County Coal Ash Landfill (State Permit No. 4204-P08)  
Halifax County, North Carolina**

Dear Jim:

On behalf of Halifax County, G.N. Richardson & Associates, Inc. (GNRA) would like to inform you of the following information.

It has recently come to the attention of Halifax County that a minor amount of coal fines has been accepted at the Halifax County Coal Ash Landfill as part of the disposal of dewatered sludge material received from the Roanoke Valley Energy Facility, which is owned (with LG&E Power, Inc.) and operated by Westmoreland Energy, LLC. The dewatered sludge material is removed from a coal pile detention pond at the Roanoke Valley Energy Facility in Weldon. While the coal fines make up only about 5% of the sludge material, it is a material which the facility is not currently permitted to receive. The remainder of the sludge material (95%) consists of materials which the facility is currently permitted to receive.

The following is a description of the wastes which make up the sludge provided by Ms. Maggie Estrada of LG&E Energy, co-owner of the Roanoke Valley Energy Facility.

“The "dewatered" sludge removed from the coal pile detention pond at the Roanoke Valley Energy Facility consists primarily of fly ash sediment and FGD (Flue-Gas Desulfurization) waste, and a minimal amount of coal fines (approximately 5%). The FGD waste consists of lime and a portion of recycle fly ash. Both the fly ash and the FGD waste fall under the definition of "coal combustion by-products", for which the landfill is permitted to accept. However, the coal fines do not fall under this definition, and thus, are not specifically covered under the landfill permit.

The various process sources entering into the coal pile detention pond include: stormwater runoff from the coal pile, stormwater runoff from the FGD area, runoff from the fly ash unloading area, excess lime slurry, and scrubber wastes. (For clarification, the lime slurry and scrubber wastes are FGD wastes). All of which settles out into the pond as sludge and is removed several times a year. Note that although from different process

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sources, all materials are fly ash, FGD waste, and coal fines. A TCLP is taken before sending any sludge to the landfill. Every TCLP analysis performed has demonstrated the sludge is an acceptable solid waste.”

Halifax County would like to request that the incidental coal fines that are a part of the dewatered sludge received at the coal ash landfill be added to the list of acceptable wastes in the permit. If this should not be acceptable, the County requests further guidance in this matter.

Should you have any questions or require any additional information, please contact us at your earliest convenience.

Sincerely,  
**G.N. Richardson & Associates, Inc.**

A handwritten signature in black ink, appearing to read "Pieter K. Scheer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Pieter K. Scheer, P.E.  
Project Manager

cc: Frank Ralph, Halifax County  
Larry Garriss, Halifax County  
Don Keisling, Roanoke Valley Energy Facility