



Permit No.	Scan Date	DIN
1809-INDUS-	January 29, 2013	18310

526 South Church St.
Charlotte, NC 28202

RECEIVED
January 29, 2013
Solid Waste Section
Asheville Regional Office

Mailing Address:
P.O. Box 1006
Mail Code EC13K
Charlotte, NC 28201-1006
704-382-4761
704-382-6240 fax

January 25, 2013

North Carolina Department of Environment and Natural Resources
Division of Waste Management – Solid Waste Section
2090 U.S. Highway 70
Swannanoa, North Carolina 28778

Attention: Mr. Larry Frost

**Reference: Request for Alternative Cover Material to Replace Intermediate Cover
Marshall Flue Gas Desulfurization (FGD) Residue Landfill (Permit No. 1809)**

Dear Mr. Frost:

Based upon our telephone conversation on November 7, 2012, I submit this request that the North Carolina Department of Environment and Natural Resources (NCDENR) Division of Waste Management Solid Waste Section consider approval of alternative cover material (ACM) to replace intermediate soil cover requirements currently contained in the Operations Plan for the Flue Gas Desulfurization (FGD) Landfill at Duke Energy's Marshall Steam Station (Permit No. 1809).

Section 2.1.8.4 of the most recent landfill Operations Plan states the following:

A 12-inch-thick intermediate cover layer will be placed on areas where final grades have been reached or where placement will be inactive for 12 months or more.

During 2011, Duke Energy received approval from NCDENR for landfill Dust Control Plans. The Dust Control Plans permit various alternative cover material options in addition to operational cover soil to control fugitive dust emissions. Since implementation of the Dust Control Plans, ACM application has proven environmentally protective and effective in suppressing dust emissions at each of the landfills. Routine monitoring of the program is ongoing, as specified in the landfill Dust Control Plans.

At the time, approval of ACM application as an alternative to operational cover soil was sought to remedy dust issues. With that request, ACM was not sought as an alternative to *intermediate* cover soil since dust control is not the primary purpose of intermediate cover soil requirements. Therefore, the requirement for intermediate cover soil application has remained.

With this request, Duke Energy proposes to eliminate the requirement for intermediate cover soil application at Marshall Steam Station's FGD Residue Landfill. Intermediate soil is not warranted in areas where waste placement will be inactive for 12 months or more if ACM is effectively applied. However, intermediate cover soil will be applied on exterior slopes and in areas where final grades have been reached. In cases where the landfill has reached final

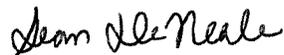
height and a top deck minimum of 5 acres, partial closure will be considered for that portion of the landfill.

The application of alternative cover material, as outlined in landfill Dust Control Plans, shall continue in order to promote environmental protection and effective operations. The Dust Control Plans currently require that preventative dust control measures be observed and documented at least twice daily (morning and afternoon) when the landfill is in operation to evaluate the dust control measure performance. Since implementation of ACM at the FGD Residue Landfill, these regular observations have illustrated the strong effectiveness of ACM in preventing dust issues. Monitoring worksheets, referenced and provided in the landfill Dust Control Plan, have been completed since June 2012. Recorded observations have noted no issues since implementation, further illustrating the effectiveness of ACM. The monitoring worksheets and photos are provided as attachments to this request letter for additional reference. These observational requirements will remain to monitor ACM performance from a dust control perspective. Appropriate corrective actions will be taken if issues are observed.

Performance of the ACM from an erosion and sediment control perspective is monitored as part of the inspections required in the Erosion Control Plans. Erosion Control Plans currently require that the landfill be inspected weekly or after each one-half-inch rainfall event. Duke Energy proposes continued monitoring of ACM performance from an erosion and sediment control perspective weekly or after a one-half-inch rainfall event, regardless of landfill operation. Appropriate corrective actions will be taken if issues are observed.

Changes to sections of the Operations Plans pertaining to the use of intermediate cover will be reflected with the next permit modification or 5-year renewal for each landfill.

Sincerely,



Sean DeNeale, Engineer I
Environmental Services

cc: Mr. Ed Sullivan – Duke Energy Corporation
Mrs. Kim Hutchinson – Duke Energy Corporation

Attachment A

Dust Control Plan Monitoring Worksheets

Marshall Steam Station

Permit No. 1809

Flue Gas Desulfurization (FGD) Residue Landfill

FGD Residue Landfill, Cell 1
Permit No. 1809

Dust Control Plan-
Monitoring Worksheet

Marshall Steam Station
Terrell, North Carolina

Week:

Date/Time	Dust Control Method in Use	Effective Yes/no	Observation Location	Preventative or Corrective Action Taken Yes/No	Observations/comments including: weather conditions, wind speeds, precipitation, forecast, preventative or corrective actions taken (if needed), additional operational notes	Name of observer
6-7-2012 8:00	Water truck	Yes	North Cell 1	NO	SUNNY + WARM	Romie Pickett
6-7-2012 3:30	Water truck	Yes	North Cell 1	NO	SUNNY + WARM	Romie Pickett
6-12-12 3:30	Water Truck	Yes	North Cell 1	NO	OPEN CAST + WARM	Steve Fausst
6-15-12 3:00	Water Truck	Yes	North Cell 1	NO	SUNNY + WARM	Steve Fausst
6-18-2012 10:15	Water truck	Yes	North End	NO	WARM	RLP
6-18-2012 2:30	Water truck	Yes	North end	NO	WARM	RLP
6-19-2012 8:00	Water truck	Yes	North End	NO	WARM	RLP
6-19-2012 1:00	Water truck	Yes	North End	NO	WARM	RLP
6-20-2012 8:00	Water truck	Yes	North End	NO	WARM	RLP
6-20-2012 12:30	Water truck	Yes	North End	NO	HOT	RLP
6-21-2012 10:30	Water truck	Yes	North End	NO	HOT	RLP
6-21-2012 1:30	Water truck	Yes	North End	NO	HOT	RLP
6-22-2012 8:00	Water truck	Yes	North End	NO	HOT	RLP
6-22-12 12:45	Water truck	Yes	North End	NO	HOT	RLP

FGD Residue Landfill, Cell 1
Permit No. 1809

Dust Control Plan-
Monitoring Worksheet

Marshall Steam Station
Terrell, North Carolina

Week:

Date/Time	Dust Control Method in Use	Effective Yes/no	Observation Location	Preventative or Corrective Action Taken Yes/No	Observations/comments including: weather conditions, wind speeds, precipitation, forecast, preventative or corrective actions taken (if needed), additional operational notes	Name of observer
6-25-12	9:30 @ water truck	Yes	North END	NO	Mild	RLP
6-25-12	2:00 @ water truck	Yes	North END	NO	HOT	RLP
6-26-12	10:30 @ water truck	Yes	North END	NO	WARM	RLP
6-26-12	12:30 @ water truck	Yes	North END	NO	WARM + SUNNY	RLP
6-27-12	7:45 @ water truck	Yes	North END	NO	MILD + SUNNY	RLP
6-27-12	1:00 @ water truck	Yes	North END	NO	HOT + SUNNY	RLP
6-28-12	11:00 @ water truck	Yes	North END	NO	HOT + SUNNY	RLP
6-28-12	4:30 @ water truck	Yes	North END	NO	HOT + SUNNY (SAOT) at 5:30 pm	RLP
6-29-12	8:00 @ water truck	Yes	North END	NO	HOT + SUNNY	RLP
6-29-12	2:30 @ water truck	Yes	North END	NO	MOY, HOT, HOT	RCP
7-2-12	8:00 @ water truck	Yes	North END	NO	HOT + SUNNY	RCP
7-2-12	3:00 @ water truck	Yes	North END	NO	HOT + SUNNY	RCP
7-3-12	10:30 @ water truck	Yes	North END	NO	HOT + SUNNY	RCP
7-3-12	1:00 @ water truck	Yes	North END	NO	HOT + SUNNY	RCP

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Marshall Steam Station
Terrell, North Carolina

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7-4-2012	8:00 @ water truck	Yes	North End	NO	Hot + sunny	RLP
7-4-12	1:00 @ water truck	Yes	North End	NO	Hot + sunny	RLP
7-5-12	10:00 @ water truck	Yes	North End	NO	Hot + sunny	RLP
7-5-12	12:30 @ water truck	Yes	North End	NO	Hot + sunny	RLP
7-6-12	10:30 @ water truck	Yes	North End	NO	Hot + sunny	RLP
7-6-12	1:30 @ water truck	Yes	North End	NO	Hot + sunny	RLP
7-10-12	8:00 @ water truck	Yes	North End	NO	Hot + sunny	SKF
7-11-12	8:00 @ water truck	Yes	North End	NO	Hot sunny + warm	RLP
7-11-12	3:00 @ water truck	Yes	North End	NO	Hot sunny + warm	RLP
7-12-12	8:30 Rain	Yes	North End	NO	overcast + cool	RLP
7-12-12	3:15 Rain	Yes	North End	NO	overcast + cool	RLP
7-13-12	8:00 Rain	Yes	N End	NO	overcast + warm	RLP
7-13-12	3:30 @ water truck	Yes	N End	NO	Sunny + Hot	RLP

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Marshall Steam Station
Terrell, North Carolina

Week:

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7-14-12	8:00 @ WT	Yes	N END	N	Warm	RP
7-14-12	1:00 @ WT	Yes	N END	N	Hot	RP
7-15-12	8:00 Rain	Yes	N END	N	Hot	RP
7-15-12	17:30 Rain	Yes	N END	N	Hot	RP
7-16-12	7:30 Rain	Yes	N END	N	Hot	RP
7-16-12	4:00 @ WT	Yes	N END	N	Warm	RP
7-17-12	10:30 Rain	Yes	N END	N	Hot	RP
7-17-12	12:00 Rain	Yes	N END	N	Cool	RP
7-18-12	8:00 @ WT	Yes	N END	N	Warm	RP
7-18-12	2:30 @ WT	Yes	N END	N	Hot	RP
7-19-12	7:00 good	Yes	S END	N	Hot	RP
7-19-12	7:00 Rain	Yes	N END	✓	muggy	RP
7-20-12	8:00 at Rain	Yes	N END	✓	Warm + some clouds	RP
7-20-12	3:30 @ water tank	Yes	N END	✓	Hot + sunny	RP

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7-21-12	9:00 @ water truck	Y	N END	NO	Warm + clear	RP
7-21-12	4:50 @ water truck	Y	N END	N	Hot + some overcast	RP
7-22-12	8:00 @ water truck	Y	N END	N	Hot + some rain	
7-22-12	4:30 @ water truck	Y	N END	N	Hot + overcast	
7-23-12	9:00 @ wt	Y	N END	N	Hot + cloudy	
7-23-12	2:00 @ wt	Y	N END	N	Hot + cloudy	
7-24-12	8:00 @ wt	Y	N END	N	HOT	
7-24-12	1:00 @ wt	Y	N END	N	HOT	
7-25-12	8:00 @ wt	Y	N END	N	HOT	
7-25-12	12:30 Rain	Y	N END	N	HOT NOON SHOWERS	
7-26-12	10:00 @ wt	Y	N END	N	HOT	
7-26-12	12:45 @ wt	Y	N END	N	HOT	
7-27-12	8:00 @ wt	Y	N END	N	HOT	
7-27-12	1:00 @ wt	Y	N END	N	HOT	

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7-28-12	8:00 @ WT	Y	N END	N	Hot clear	RP
7-28-12	3:00 @ WT	Y	N END	N	Hot clear	RP
7-29-12	8:00 @ WT	Y	S END	N	Cool clear	RP
7-29-12	12:30 @ WT	Y	N END	N	Hot shower	RP
7-30-12	10:00 @ WT	Y	N END	N	Hot clear	RP
7-30-12	1:00 @ WT	Y	S END	N	Hot clear	RP
7-31-12	8:00 @ WT	Y	S END	N	Warm clear	RP
7-31-12	1:00 @ WT	Y	S END	N	Hot clear	RP
8-1-12	8:00 @ WT	Y	S END	N	Warm cloudy	RP
8-1-12	12:30 @ WT	Y	S END	N	Hot cloudy	RP
8-2-12	4:00 @ WT	Y	S END	N	Warm shower	RP
8-2-12	12:30 @ WT	Y	N END	N	Hot cloudy	RP
8-3-12	9:30 @ WT	Y	N END	N	Warm overcast	RP
8-3-12	5:30 @ WT	Y	S END	N	Hot	RP

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8-4-12	8:00 @ WT	Y	N END	N	Hot + muggy	RLP
8-4-12	3:30 @ WT	Y	N END	N	Hot + clear	RLP
8-6-12	7:00 @ WT	Y	N END	N	mild + clear	RIP
8-6-12	3:30 @ WT + rain	Y	N END	N	Hot + cloudy Rain afternoon	RLP
8-7-12	9:00 @ WT	Y	N END	N	overcast	RIP
8-7-12	5:00 @ WT	Y	N END	N	Hot + cloudy	RLP
8-8-12	9:00 @ WT	Y	N END	N	cloudy + cool	RIP
8-8-12	1:00 @ WT + rain	Y	N END	N	cloudy + HOT some rain	RIP
8-9-12	10:30 @ WT	Y	N END	N	overcast	RIP
8-9-12	4:30 @ WT	Y	N END	N	overcast	RIP
8-10-12	8:00 @ WT	Y	N END	N	overcast	RIP
8-10-12	12:45 @ WT	Y	N END	N	overcast + afternoon rain	RIP
8-11-12	8:15 @ WT	Y	N END		cloudy + little rain	RIP
8-11-12	1:30	Y	N END	N	cloudy + hot + muggy	RIP

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8-13-12	7:30 ① WT	Y	N End	NO	Sunny & clear	BW
8-13-12	5:00 ① WT	Y	N End	NO	Sunny & few clouds	BW
8-14-12	7:30 ① WT	Y	N End	NO	Sunny & few clouds	T.O
8-14-12	5:00 ① WT	Y	N End	NO	Partly cloudy	BW
8-15-12	7:00 ① WT	Y	N End	NO	Mostly cloudy	BW
8-15-12	4:15 ① WT	Y	N End	NO	Partly cloudy	T.O
8-16-12	7:00 ① WT	Y	N End	NO	Sunny & clear	T.O
8-16-12	4:45 ① WT	Y	N End	NO	Sunny	T.O
8-17-12	7:00 ① WT	Y	N End	NO	Sunny	T.O
8-17-12	2:30 ① WT	Y	N End	NO	Sunny	T.O
8-18-12	9:00 ① WT	Y	N End	NO	Cloudy	T.O
8-18-12	4:30 ① WT	Y	N End	NO	Sunny & few clouds	T.O
8-20-12	8:00 ① WT	Y	N End	NO	overcast 1.8 inch rain	RLP
8-20-12	4:30 ① WT	Y	N End	NO	cloudy	RLP

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8-21-12	11:00 ① WT	Yes	N End	NO	SUNNY + COOL	RIP
8-21-12	4:30 ① WT	Yes	N End	NO	SUNNY + WARM	RIP
8-22-12	9:30 ① WT	YES	N End	NO	OVERCAST	T.O
8-22-12	5:00 PM ① WT	yes	N End	NO	SUNNY + CLOUDY	T.O
8-23-12	7:00 ① WT	yes	N End	NO	OVERCAST	T.O.
8-23-12	5:00 ① WT	Yes	N End	NO	SUNNY + SOME CLOUDS	T.O.
8-24-12	7:00 ① WT	Yes	N End	NO	PARTLY CLOUDY	T.O
8-24-12	4:00 ① WT	Yes	N End	NO	SUNNY CLOUDY	T.O
8-25-12	7:00 ① WT	yes	N End	NO	PARTLY CLOUDY	T.O
8-25-12	12:30 ① WT	Yes	N End	NO	SUNNY + LITTLE WINDY	RIP
8-27-12	8:00 ① WT	Yes	N End	NO	PARTLY CLOUDY	RIP
8-27-12	5:15 ① WT	YES	N End	NO	SUNNY	T.O
8-28-12	7:00 ① WT	yes	N End	NO	OVERCAST	T.O
8-28-12	4:45 ① WT	yes	N End	NO	PARTLY CLOUDY	T.O

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8-29-12	10:50 ① WT	Y	N End	N	SUNNY + HOT	RIP
8-29-12	2:00	Y	N End	N	SUNNY + HOT	RIP
8-30-12	7:00 ① WT	Y	N End	N	Sunny	T.O
8-30-12	4:50 ① WT	Y	N End	N	Cloudy	T.O
8-31-12	7:00 ① WT	Y	N End	N	Sunny	T.O
8-31-12	4:00 ① WT	Y	N End	N	Sunny	T.O
9-1-12	10:00 ① WT	X	N End	N	Sunny * Hot	T.O
9-2-12	10:00 ① WT	Y	N End	N	Sunny * Hot	T.O
9-3-12	7:00 ① WT	Y	N End	N	Cloudy	T.O
9-3-12	3:00 ① WT	Y	N End	N	Cloudy	T.O
9-4-12	7:00 ① WT	Y	N End	N	Overcast	T.O
9-4-12	4:30 ① WT	Y	N End	N	Overcast	T.O
9-5-12	7:15 ① WT	Y	N End	N	Overcast	T.O
9-5-12	4:30 ① WT	Y	N End	N	Cloudy	T.O

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9-6-12	7:00 ① WT	Y	n End	n	Cloudy	T.O
9-6-12	5:00 ① WT	Y	n End	n	Sunny	T.O
9-7-12	7:00 ① WT	Y	n End	n	Muggy * Sunny	T.O
9-7-12	4:00 ① WT	Y	n End	n	Sunny	T.O
9-10-12	7:00 ① WT	Y	n End	n	Sunny	T.O
9-10-12	4:30 ① WT	Y	n End	n	cloudy	T.O
9-11-12	7:00 ① WT	Y	n End	n	cloudy	T.O
9-11-12	4:15 ① WT	Y	n End	n	Sunny	T.O
9-12-12	7:00 ① WT	Y	n End	n	Pratly cloudy	T.O
9-12-12	4:30 ① WT	Y	n End	n	Sunny	T.O
9-13-12	7:00 ① WT	Y	n End	n	Sunny	T.O
9-13-12	4:00 ① WT	Y	n End	n	Sunny	T.O
9-14-12	7:00 ① WT	Y	n End	n	Fair	T.O
9-14-12	4:00 ① WT	Y	n End	n	Sunny	T.O

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9-17-12	7:00 ① WT	Y	^ End	n	Fog + rain + cloudy	T.O
9-17-12	4:00 ① WT	Y	^ End	n	Rain	T.O
9-18-12	Rain	Y	^ END	N	Rain	TO
		Y	^ END	N		TO
9-19-12	7:00 ① WT	Y	^ End	n	cloudy	TO
9-19-12	4:30 ① WT	Y	^ End	n	Sunny	T.O
9-20-12	7:00 ① WT	Y	^ End	n	Sunny	TO
9-20-12	3:30 ① WT	Y	^ End	n	Sunny	T.O
9-21-12	7:00 ① WT	Y	^ End	n	Sunny	T.O
9-21-12	2:00 ① WT	Y	^ End	n	Sunny	T.O
9-24-12	7:00 ① WT	Y	^ End	n	Sunny	TO
9-24-12	4:45 ① WT	Y	^ End	n	Sunny	T.O
9-25-12	7:00 ① WT	Y	^ End	n	Sunny	T.O
9-25-12	4:30 ① WT	Y	^ End	n	Sunny	T.O

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9-26-12	7:00 ① WT	Y	ⁿ End	n	Sunny	T.O
9-26-12	4:30 ① WT	Y	ⁿ End	n	Sunny	TO
9-27-12	7:00 ① WT	Y	ⁿ End	n	Sunny	TO
9-27-12	3:00 ① WT	Y	ⁿ End	n	Sunny	TO
9-28-12	7:00 ① WT	Y	ⁿ End	n	Sunny	TO
9-28-12	12:45 ① WT	Y	^N END	N	Sunny	T.O.
9-29-12	8:00 ① WT	Y	^N END	N	Sunny Rain	RIP
9-29-12	1:00 ① WT	Y	^N END	N	Rain	RIP
10-1-12	8:30 Rain	Y	^N END	N	Rain	RIP
10-1-12	4:30 Rain	Y	^N END	N	Rain	RIP
10-2-12	7:00 Rain	Y	^N End	N	Rain	TO
10-2-12	4:30 Rain	Y	^N End	N	Rain	TO
10-3-12	7:00 ① WT	Y	^N End	N	Partly cloudy	TO
10-3-12	4:30 ① WT	Y	^N End	N	Cloudy	TO

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10-4-12	7:00 ① WT	Y	N End	N	Partly cloudy	T.O
10-4-12	4:45 ① WT	Y	N End	N	Sunny	TO
10-5-12	7:00 ① WT	Y	N End	N	cloudy	T.O
10-5-12	4:30 ① WT	Y	N End	N	Sunny	T.O
10-6-12	7:00 ① WT	Y	N End	N	Cloudy	T.O
10-8-12	7:00 ① WT	Y	N End	N	Partly cloudy	TO
10-8-12	4:30 ① WT	Y	N End	N	Cloudy	T.O
10-9-12	7:00 ① WT	Y	N End	N	overcast	T.O
10-9-12	4:30 ① WT	Y	N End	N	Sunny	T.O
10-10-12	7:00 ① WT	Y	N End	N	Sunny	TO
10-10-12	4:50 ① WT	Y	N End	N	Sunny	TO
10-11-12	7:00 ① WT	Y	N End	N	cloudy	TO
10-11-12	5:00 ① WT	Y	N End	N	Sunny	TO
10-12-12	7:00 ① WT	Y	N End	N	Sunny	TO

FGD Residue Landfill, Cell 1
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Dust Control Plan-
Monitoring Worksheet

Marshall Steam Station
Terrell, North Carolina

Week:

Date/Time	Dust Control Method in Use	Effective Yes/no	Observation Location	Preventative or Corrective Action Taken Yes/No	Observations/comments including: weather conditions, wind speeds, precipitation, forecast, preventative or corrective actions taken (if needed), additional operational notes	Name of observer
10-12-12	4:00 ① WT	Y	^N End	N	Sunny	TO
10-13-12	7:00 ① WT	Y	^N End	N	Sunny	TO
10-13-12	3:00 ① WT	Y	^N End	N	Sunny	TO
10-14-12	9:00 ① WT	Y	^N End	N	Sunny	TO
10-15-12	7:00 ① WT	Y	^N End	n	Rain	TO
10-15-12	4:00 ① WT	Y	^N End	n	Rain	TO
10-16-12	7:00 ① WT	Y	^N End	n	Sunny	TO
10-16-12	5:00 ① WT	Y	^N End	n	Sunny	TO
10-16-12	7:00 ① WT	Y	^N End	n	Fair	TO
10-17-12	4:45 ① WT	Y	^N End	n	Fair	TO
10-18-12	7:00 ① WT	Y	^N End	n	cloudy	TO
10-18-12	4:30 ① WT	Y	^N End	n	Rain	TO
10-19-12	7:00 ① WT	Y	^N End	n	Fog	TO
10-20-12	10:00 ① WT	Y	^N End	n	Sunny	TO

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Dust Control Plan-
Monitoring Worksheet

Marshall Steam Station
Terrell, North Carolina

Week:

Date/Time	Dust Control Method in Use	Effective Yes/no	Observation Location	Preventative or Corrective Action Taken Yes/No	Observations/comments including: weather conditions, wind speeds, precipitation, forecast, preventative or corrective actions taken (if needed), additional operational notes	Name of observer
10-21-12	10:00 ① WT	Y	N End	N	Sunny	T.O
10-22-12	7:00 ① WT	Y	N End	N	Sunny	T.O
10-22-12	4:45 ① WT	Y	N End	N	Sunny	T.O
10-23-12	7:00 ① WT	Y	N End	N	Sunny	T.O
10-23-12	4:45 ① WT	Y	N End	N	Sunny	T.O
10-24-12	7:00 ① WT	Y	N End	N	Sunny	T.O
10-24-12	4:45 ① WT	Y	N End	N	Sunny	T.O
10-25-12	7:00 ① WT	Y	N End	N	Sunny	T.O
10-25-12	4:50 ① WT	Y	N End	N	Sunny	T.O
10-26-12	7:00 ① WT	Y	N End	N	Partly sunny	T.O
10-26-12	5:30 ① WT	Y	N End	N	Clear	T.O
10-27-12	7:00 ① WT	Y	N End	N	Cloudy	T.O
10-28-12	7:00 ① WT	Y	N End	N	Cloudy	T.O
10-29-12	7:00 ① WT	Y	N End	N	Cloudy	T.O

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Marshall Steam Station
Terrell, North Carolina

Week:

Date/Time	Dust Control Method in Use	Effective Yes/no	Observation Location	Preventative or Corrective Action Taken Yes/No	Observations/comments including: weather conditions, wind speeds, precipitation, forecast, preventative or corrective actions taken (if needed), additional operational notes	Name of observer
10/29/12	7:00 @ WT	y	^ End	n	cloudy	TO
10/29/12	5:00 @ WT	y	^ End	n	partly cloudy	TO
10/30/12	7:00 @ WT	y	^ End	n	cloudy	TO
10/30/12	5:00 @ WT	y	^ End	n	sunny	TO
10/31/12	7:00 @ WT	y	^ End	n	sunny	TO
10/31/12	5:00 @ WT	y	^ End	n	sunny	TO
11/1/12	7:00 @ WT	y	^ End	n	sunny	TO
11/1/12	5:00 @ WT	y	^ End	n	sunny	TO
11/2/12	7:00 @ WT	y	^ End	n	sunny	TO
11/2/12	5:00 @ WT	y	^ End	n	sunny	TO
11/3/12	7:00 @ WT	y	^ End	n	sunny	TO
11/4/12	5:00 @ WT	y	^ End	n	cloudy	TO
11/5/12	7:00 @ WT	y	^ End	n	over cast	TO
11/5/12	5:00 @ WT	y	^ End	n	over cast	TO

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Dust Control Plan-
Monitoring Worksheet

Marshall Steam Station
Terrell, North Carolina

Week:

Date/Time	Dust Control Method in Use	Effective Yes/no	Observation Location	Preventative or Corrective Action Taken Yes/No	Observations/comments including: weather conditions, wind speeds, precipitation, forecast, preventative or corrective actions taken (if needed), additional operational notes	Name of observer
10/7/12	7:00 @ WT	Y	N End	N	Cloudy	TO
10/7/12	4:30 @ WT	Y	N End	N	Sunny	TO
10/8/12	7:00 @ WT	Y	N End	N	Sunny	TO
11/8/12	4:30 @ WT	Y	N End	n	Sunny	T.O
11/9/12	7:00 @ WT	Y	N End	n	Sunny	RL
11/9/12	4:00 @ WT	Y	N End	n	Sunny	RL
11/10/12	10:00 @ WT	Y	N End	n	Sunny	TO
11/11/12	9:00 @ WT	Y	N End	n	Sunny	TO
11/12/12	7:00 @ WT	Y	N End	n	cloudy	TO
11/12/12	6:00 @ WT	Y	N End	n	cloudy	TO
11/13/12	7:00 @ WT	Y	N End	n	cloudy	TO
11/13/12	4:00 @ WT	Y	N End	n	Sunny	TO
11/14/12	7:00 @ WT	Y	N End	n	Sunny	TO
11/15/12	7:00 @ WT	Y	N End	n	cloudy	TO

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Dust Control Plan-
Monitoring Worksheet

Marshall Steam Station
Terrell, North Carolina

Week:

Date/Time	Dust Control Method in Use	Effective Yes/no	Observation Location	Preventative or Corrective Action Taken Yes/No	Observations/comments including: weather conditions, wind speeds, precipitation, forecast, preventative or corrective actions taken (if needed), additional operational notes	Name of observer
11/15/12	4:00 @ WT	Y	End	n	overcast	To
11/16/12	7:00 @ WT	Y	End	n	Sunny	To
11/16/12	3:00 @ WT	Y	End	n	Sunny	To
11/19/12	7:00 @ WT	Y	End	n	Sunny	To
11/19/12	4:45 @ WT	Y	End	n	Sunny	To
11/20/12	7:00 @ WT	Y	End	n	Sunny	To
11/20/12	4:45 @ WT	Y	End	n	cloudy	To
11/21/12	7:00 @ WT	Y	End	n	cloudy	To
11/21/12	5:00 @ WT	Y	End	n	Sunny	To
11/23/12	7:00 @ WT	Y	End	n	Sunny	To
11/23/12	4:30 @ WT	Y	End	n	Sunny	To
11/26/12	7:00 @ WT	Y	End	n	Sunny	To
11/26/12	4:45 @ WT	Y	End	n	Sunny	To
11/27/12	7:00 @ WT	Y	End	n	cloudy	To

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Dust Control Plan-
Monitoring Worksheet

Marshall Steam Station
Terrell, North Carolina

Week:

Date/Time	Dust Control Method in Use	Effective Yes/no	Observation Location	Preventative or Corrective Action Taken Yes/No	Observations/comments including: weather conditions, wind speeds, precipitation, forecast, preventative or corrective actions taken (if needed), additional operational notes	Name of observer
11/27/12	4:45 @ WT	Y	n End	n	Cloudy	TO
11/28/12	7:00 @ WT	Y	n End	n	Cloudy	TO
11/28/12	4:45 @ WT	Y	n End	n	Cloudy	TO
11/29/12	7:00 @ WT	Y	n End	n	Sunny	TO
11/29/12	4:45 @ WT	Y	n End	n	Sunny	TO
11/30/12	7:00 @ WT	Y	n End	A	Sunny	TO
11/30/12	4:00 @ WT	Y	n End	n	Sunny	TO
12/3/12	7:00 @ WT	Y	n End	n	Sunny	TO
12/3/12	4:45 @ WT	Y	n End	n	Sunny	TO
12/4/12	7:00 @ WT	Y	n End	n	Sunny	TO
12/4/12	4:45 @ WT	Y	n End	n	Sunny	TO
12/5/12	7:00 @ WT	Y	n End	n	Cloudy * Showers	TO
12/5/12	4:45 @ WT	Y	n End	n	Cloudy	TO
12/6/12	7:00 @ WT	Y	n End	n	Cloudy	TO

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Dust Control Plan-
Monitoring Worksheet

Marshall Steam Station
Terrell, North Carolina

Week:

Date/Time	Dust Control Method in Use	Effective Yes/no	Observation Location	Preventative or Corrective Action Taken Yes/No	Observations/comments including: weather conditions, wind speeds, precipitation, forecast, preventative or corrective actions taken (if needed), additional operational notes	Name of observer
12/6/12	4:30 ① WT	Y	ⁿ End	n	cloudy	TO
12/7/12	7:00 ① WT	Y	ⁿ End	n	cloudy	TO
12/7/12	4:00 ① WT	Y	ⁿ End	n	Mostly cloudy	TO
12/8/12	7:00 ① WT	Y	ⁿ End	n	Cloudy	TO
12/8/12	12:00 ① WT	Y	ⁿ End	n	Cloudy	TO
12-10-12	7:00 ① WT	Y	ⁿ End	n	overcast	TO
12-10-12	4:45 ① WT	Y	ⁿ End	n	cloudy	TO
12/11/12	7:00 ① WT	Y	ⁿ End	n	cloudy	TO
12/11/12	4:45 ① WT	Y	ⁿ End	n	cloudy	TO
12/12/12	9:00 ① WT	Y	ⁿ End	n	cloudy	TO
12/12/12	4:45 ① WT	Y	ⁿ End	n	overcast	TO
12/13/12	7:00 ① WT	Y	ⁿ End	n	cloudy	TO
12/13/12	4:45 ① WT	Y	ⁿ End	n	overcast	TO
12/14/12	7:00 ① WT	Y	ⁿ End	n	clear	TO

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Marshall Steam Station
Terrell, North Carolina

Week:

Date/Time	Dust Control Method in Use	Effective Yes/no	Observation Location	Preventative or Corrective Action Taken Yes/No	Observations/comments including: weather conditions, wind speeds, precipitation, forecast, preventative or corrective actions taken (if needed), additional operational notes	Name of observer
12/14/12	4:00 ① WT	Y	n End	n	Sunny	TO
12/15/12	7:00 ① WT	Y	n End	n	cloudy	TO
12/15/12	3:00 ① WT	Y	n End	n	overcast	TO
12/17/12	7:00 ① WT	Y	n End	n	cloudy	TO
12/17/12	4:45 ① WT	Y	n End	n	Rain	TO
12/18/12	7:00 ① WT	Y	n End	n	clear Partly cloudy	TO
12/18/12	4:45 ① WT	Y	n End	n	Sunny	TO
12/19/12	7:00 ① WT	Y	n End	n	clear	TO
12/19/12	4:45 ① WT	Y	n End	n	Sunny	TO
12/20/12	7:00 ① WT	Y	n End	n	Partly cloudy	TO
12/20/12	4:45 ① WT	Y	n End	n	Rain	TO
12/21/12	7:00 ① WT	Y	n End	n	Partly clear cloudy	TO
12/21/12	4:30 ① WT	Y	n End	n	mostly sunny * wind	TO
12/23/12	7:00 ① WT	Y	n End	n	partly cloudy	TO

Attachment B

Landfill Photographs

Marshall Steam Station

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Flue Gas Desulfurization (FGD) Residue Landfill



Photo 1: Marshall FGD Residue Landfill (taken on January 23, 2013)



Photo 2: Marshall FGD Residue Landfill (taken on January 23, 2013)