

*Jim, your copy - Do you see any errors, on ins. etc?
B. H. Turner Lumber*

Halifax-7

Halifax County; J.S. Turner Lumber Yard;
Roanoke Valley Energy; The Plumbline Corp.; Wommack & Sons, Inc.;
November, 1998; December, 2003;

Halifax Co.
CEB0022

The Division received the initial notification of this project on 9/9/98. A total of 250,000 cub. yds. of fly and bottom coal ash were estimated to be required in this 8.516 acre project. The purpose of this project was to raise the elevation of the lumber drying yard from 60-65 feet to 86 feet. The starting date was October, 1998 with an estimated completion date of December, 2001. The starting date had to be adjusted to November due to the time used in obtaining all of the necessary information, construction drawings, etc. to allow determination that the project would be according to the .1700 rules if constructed according to the plans. An approved erosion and sedimentation plan was submitted and the Army Corps of engineers determined that there were no wetlands on the site. The land owner furnished a signed authorization to use CCBPs in the structural fill on the property and he promised to record the completed fill with the county register of deeds.

The project was approximately 80% completed on September 16, 1999 when hurricane Floyd struck, flooding the project site. The engineer verbally reported that the retaining earthen berm survived and that no ash left the site. This flood has been classified at a minimum as a 100 year event. A request to revise the project plan was received January 31, 2000 and this proposed to enlarge the project by 0.344 acre, increase the side slopes from 4:1 horizontal to vertical to 3:1 (which is the maximum slope allowed for coal ash in the .1700 Rules) and increase the final elevation by an additional 10 feet. This revision increases the amount of ash to be utilized from 250,000 to 495,000 cub. yds. On March 16, 2000 the requested changes were approved.

On August 9, 2000 the construction engineer was told that the Division could not accept a second revision to the project which he verbally reported he was planning to submit. The reason given was that the Division was experiencing failures to receive closure certifications and inaccurate recordation statements (if any was received) on projects with revisions. Also, they became complicated to the point that they were difficult to follow. He agreed to reworking the drawings, narrative and other required provisions into a single notification. The original start date would be included in the "combined project". The "combined" notification was received on May 2, 2001.

On May 16, 2001 Ben Barnes of the Field Operations Branch visited the site and observed a pit in the southern (approved) portion of the project that had been excavated to a depth of at least ten feet. The drawings did not show or mention excavations. Ben also observed what appeared to be placement of ash which exceeded the limit of ash placement shown on the construction drawing. Some outside ash slopes appeared to exceed the .1700 rule maximum of 3:1 horizontal to vertical. As a result of these noted violations, an on-site meeting was held on May 31, 2001. The persons present were from the Raleigh Permitting Branch, Field Operations Branch representatives, the construction P.E., the generating site Plant Manager, the land owner, and a corporate project manager from the home office of the generator.

The above violations were discussed on the 31st. Also, inconsistencies were pointed out in the drawings as to what was to be the final targeted elevation of the fill. One development was that the excavation was admitted to have been as deep as 17 feet and also that some excavation had occurred in 1998 at the beginning of the project. The construction P.E. engineer was asked to

*The original South portion of the project and surrounding become 11.5 acre - 8.516 + .344 = 8.860 not 11.5
I am trying to involve this with Grant.*

Halifax-7 (cont'd)

furnish proof that there was two feet separation between the ground water and the ash. The placement of ash beyond the ash limit specified on the drawing and some instances of apparent exceedance of the maximum 3:1 slope for ash were noted by the construction P.E. who agreed to correct those infractions. A June 7, 2001 letter from the Permitting Branch to the generator stated that a "hold" was being placed on any additional study of the new 13.5 acre northern portion until the violations in the southern portion have been corrected. The purpose of the northern portion is to furnish access to the site from 3rd street (Highway 158 E). On June 20, 2001 a Warning Letter was issued by the Operations Branch that summarized the violations in the southern portion of the project.

A July 18, 2001 letter from the construction P.E. to the Section Field Operations Branch addressed the violations cited in the June 20 Warning Letter and included the written descriptions, documentation from other sources, and revised plan drawings to correct those violations. Following a site inspection on August 2, 2001, on August 22, 2001 the Field Operations Branch issued a letter of Correction of Violation.

On July 31, 2001, the construction P.E. submitted a letter and package of information and revised plan drawings regarding the northern portion (13.5 acres) of the project. This information combined with previously received materials allowed the Permitting Branch to acknowledge on August 2, 2001 that the submitted information satisfied the requirements of notification in the .1700 Rules. An included request by the construction P.E. that he be allowed to utilize existing on-site soil from the northern portion as cover for the site was denied. This was because of concern of compromising the 2 foot separation between ground water and ash in the relatively low topographical area.

In response to an earlier request from the Permitting Branch, on August 14, the construction P.E. provided revised date estimates and volume of ash estimates for the "combined project". The date that the project was first begun was November, 1998 and the new estimated date of completion is December, 2003. The estimated total amount of ash to be utilized is 683,200 cubic yards, with 71,620 cubic yards being bottom ash and 611,580 being fly ash.