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| Permit No. | Scan Date | DIN |
| 1809-INDUS- | September 16, 2013 | 19795 |

526 South Church St.
Charlotte, NC 28202

P.O. Box 1006
Mail Code EC13K
Charlotte, NC 28201-1006
336-215-4576
704-382-6240 fax



RECEIVED
September 16, 2013
Solid Waste Section
Asheville Regional Office

September 12, 2013

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

Attn: Mr. Larry Frost

Re: Request to Permit Additional Waste for Disposal
Marshall Steam Station
FGD Landfill Permit No. 1809-INDUS
Catawba County, North Carolina

Dear Mr.Frost,

As discussed via our phone conversation on August 28, 2013, Duke Energy requests approval for Marshall Steam Station's Flue Gas Desulfurization (FGD) Landfill to accept additional waste for disposal. The requested waste material is approved for disposal in the Marshall Steam Station Industrial Landfill No 1. (Permit No. 1812-INDUS). Permitting this waste material in the FGD Landfill will enable station operations to better manage disposal options. The material is not expected to exceed 1% of the total landfill disposal.

Section 2.1.2 of the current landfill Operations Plan states:

The Marshall FGD Landfill can accept the following waste types:

- Marshall-generated gypsum
- Marshall-generated clarifier sludge
- Marshall-generated fly ash
- Marshall-generated bottom ash
- Marshall-generated construction and demolition (C&D) debris
- Duke Energy Carolinas-generated asbestos
- Allen Steam Station (Allen)-generated gypsum Allen-generated clarifier sludge
- Cliffside Steam Station (CSS)-generated gypsum
- CSS-generated clarifier sludge
- Marshall Mill Rejects (pyrites)

Duke Energy requests addition of the following waste for disposal:

- Marshall-generated waste limestone material
- Marshall-generated land clearing and inert debris
- Marshall-generated boiler slag
- Marshall-generated ball mill rejects

- Marshall-generated sand blast material
- Marshall-generated coal waste

Section 2.1.6 of the current landfill Operations Plan will be revised to include Waste Placement procedures for limestone, boiler slag, ball mill rejects, sand blast material, and waste coal:

The waste limestone, boiler slag, ball mill rejects, sand blast material, and waste coal are transported to the landfill in dump trucks. The waste is dumped from trucks and placed on the smallest active face practical in the center of the operational area and shall not be placed within 25 feet of the exterior slopes. The waste is then spread and compacted using compactors and dozers in lifts no greater than 12 inches thick. In-place density testing is not required for waste limestone, boiler slag, ball mill rejects, sand blast material, and waste coal

Loads of waste that exhibit higher moisture content than anticipated will be placed no closer than 50 feet from the active face in thin lifts and dozed into place. No waste shall be placed in areas of accumulated water. Waste will be covered with intermediate and final cover as applicable, in accordance with the following cover sections in this plan.

Section 2.1.6.4 of the current landfill Operations Plan will be revised to include Waste Placement procedures for land clearing and inert debris

2.1.6.4 Construction and Demolition (C&D) Waste and Land Clearing and Inert Debris (LCID)

The landfill may receive construction and demolition waste, land clearing waste, inert debris, untreated wood, and yard trash (leaves, sticks). These materials shall not be placed within 25 feet of the exterior slopes. Waste will be placed on the smallest active face as practical and compacted with a dozer as densely as practical. Specific monitoring and in-place density testing of C&D waste and LCID is not required. Compacted C&D waste and LCID will be covered as described in Section 2.1.8.2.

Duke Energy proposes to revise these sections of the Operations Plan to include the additional waste streams during the next Permit amendment or modification. If there are any questions regarding this request, please contact me at (336) 215-4576.

Respectfully submitted,



Kimberlee Hutchinson, PE
Environmental Services

Cc: Elizabeth Werner, NCDENR Solid Waste
George Tolbert, Marshall Steam Station