



FACILITY COMPLIANCE INSPECTION REPORT
Division of Waste Management
Solid Waste Section

UNIT TYPE:

Lined MSWLF	LCID	YW	Transfer	Compost	SLAS	COUNTY: CATAWBA PERMIT NO.: 18-12 FILE TYPE: COMPLIANCE
Closed MSWLF	HHW	White goods	Incin	T&P	FIRM	
CDLF	Tire T&P / Collection	Tire Monofill	Industrial Landfill	<input checked="" type="checkbox"/>	DEMO	

Date of Site Inspection: 2/20/2014 and 3/7/2014 **Date of Last Inspection:** 6/19/2012

FACILITY NAME AND ADDRESS:

Duke Energy Carolinas, LLC - Marshall Steam Station
 Industrial Landfill No. 1
 8320 East NC Highway 150
 Terrell, North Carolina 28682

GPS COORDINATES: N: 35.60463 W: -80.9774

FACILITY CONTACT NAME AND PHONE NUMBER:

George Tolbert, EHS
 Duke Energy Carolinas, LLC
 (828) 478-7820
George.Tolbert@duke-energy.com

FACILITY CONTACT ADDRESS:

Registered Agent: CT Corporation System
 150 Fayetteville Street, Box 1011
 Raleigh, NC 27601

Principal Office: Duke Energy Carolinas, LLC
 526 South Church Street
 Charlotte, NC 28202-1904

PARTICIPANTS:

George Tolbert, EHS - Duke Energy Carolinas, LLC
 Kimberlee Hutchinson, PE – Duke Energy Environmental Services
 Sherrie Christopher, Contract Resource Coordinator - Duke Energy Carolinas, LLC
 Scott Parks, System Manager - Duke Energy Carolinas, LLC
 Deb Aja, NCDENR Solid Waste Section

STATUS OF PERMIT:

Active.

PURPOSE OF SITE VISIT:

Comprehensive Inspection - Inspection of operations conducted on 2/20/2014 and inspection of records conducted on 3/7/2014.

STATUS OF PAST NOTED VIOLATIONS:

None.

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OBSERVED VIOLATIONS:

1. 15A NCAC 13B .0203(d) states: "By receiving solid waste at a permitted facility, the permittee(s) shall be considered to have accepted the conditions of the permit and shall comply with the conditions of the permit."

General Permit Condition Number 6 states:

"Operation of this solid waste management facility must be in accordance with the Solid Waste Management Rules, 15A NCAC 13B, Article 9 of the Chapter 130A of the North Carolina General Statutes (NCGS 130A-290, et seq.), the conditions contained in this permit; and the approved plan. Should the approved plan and the rules conflict, the Solid Waste Management Rules shall take precedence unless specifically addressed by permit condition."

The approved Operations Plan dated November 13, 2013, *Section 3.2.1 LCS Maintenance*, states in part:

"LCS lines and sumps shall be cleaned out by the use of a clean-out snake or high-pressure water flushing at least once a year and remote-camera monitored at least once every five (5) years."

On March 7, 2014, leachate collection system lines were in the process of being cleaned and remote-camera monitored. The previous high-pressure water flushing was performed on 10/18/2012 and 10/19/2012 (no defects were noted). The leachate collection system lines had not been cleaned out in 2013 and thus had not been cleaned out at least once a year. This constitutes a violation of 15A NCAC 13B .0203(d).

To correct this violation and be in compliance with 15A NCAC 13B .0203(d), ensure that leachate collection system lines are cleaned out in accordance with the approved Operations Plan. Please submit an electronic version of the report for the March 7, 2014 clean-out to Deborah Aja at deborah.aja@ncdenr.gov within seven (7) days of receipt of the report.

The item(s) listed above were observed by Section staff and require action on behalf of the facility in order to come into or maintain compliance with the Statutes, Rules, and/or other regulatory requirements applicable to this facility. Be advised that pursuant to N.C.G.S. 130A-22, an administrative penalty of up to \$15,000 per day may be assessed for each violation of the Solid Waste Laws, Regulations, Conditions of a Permit, or Order under Article 9 of Chapter 130A of the N.C. General Statutes. Further, the facility and/or all responsible parties may be subject to enforcement actions including penalties, injunction from operation of a solid waste management facility or a solid waste collection service and any such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules.

ADDITIONAL COMMENTS

1. The landfill is permitted to receive fly ash, bottom ash, flue gas desulfurization (FGD) gypsum, FGD clarifier sludge, asbestos material, land clearing and inert debris, coal mill rejects, waste limestone material, boiler slag, construction and demolition waste, sand blast material, ball mill rejects, coal waste, and pyrites that are generated at the Marshall Steam Station. The waste stream is comprised predominantly of ash.
2. Signage was posted at the entrance to the facility in accordance with the approved operations plan.
3. The access road to the site was of all-weather construction and maintained in good condition. Since the previous inspection a truck wash station had been installed to clean trucks exiting the site.
4. Edge-of-waste markers were installed and maintained.
5. Landfill Operations have occurred in Phase 1, Cells 1 and 2. Filling activities have temporarily ceased in both cells and wastes are being placed in the FGD Landfill, Permit 18-09. Facility contractors were in the process of preparing the landfill for a soil cover to establish vegetation at the time of the inspection.
6. The wastes appeared to have been placed the landfill as generally as required: in ten foot thick operational lifts, spread in approximately 1 foot layers. Chimney drains convey the flow of leachate to the leachate control system.
7. There was no water observed ponded over waste.
8. Exterior landfill berms and slopes were observed. There was no erosion observed, however, there were areas observed that were sparsely vegetated along the eastern side of the landfill. Facility staff stated that these areas were scheduled for reseeding.

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9. Weekly logs reviewed on 3/7/2014 documented monitoring and maintenance of stormwater conveyance systems and erosion and sedimentation controls.
10. The leachate management system and leachate detection system control panels appeared to be maintained in good condition. During the 2/20/2014 inspection facility staff stated that daily inspection of the alarms is conducted to ensure that the system operates as designed.
11. Leachate is sampled semiannually from dedicated sample ports located on the leachate collection system. Access to the sampling ports for Cell 1 and Cell 2 and the areas surrounding the ports were well maintained.
12. Semi-annual leachate sampling records were reviewed on 3/7/2014. The sampling was conducted in February, 2013 and September, 2013 as required.
13. Leak detection records were reviewed on 3/7/2014. Leachate collection system and detection system flow readings were conducted monthly as required. No leakage rate exceedances were documented in the records reviewed. Once the landfill reaches 40 feet the flow readings will be conducted quarterly.
14. Dust was well controlled at the time of the inspection. Dust control monitoring logs were reviewed on 3/7/2014 for compliance with the approved Dust Control Plan. Daily dust control logs were maintained and documented measures taken to control dust as required (additional dust control measures were taken to address a recent dusting event). Dust control log forms were recently updated to provide additional detailed reporting.
15. Leachate collection system (LCS) lines were in the process of being cleaned out with camera monitoring on 3/7/2014. The previous clean-out and camera work was performed on 10/18/2012 and 10/19/2012. No defects were noted. The Operations Plan requires that the LCS lines and sumps shall be cleaned out by the use of a clean-out snake or high-pressure water flushing at least once a year and remote-camera monitored at least once every five (5) years. Please forward copy of report of clean-out and camera work. See *Observed Violations* section of this report.
16. Training records were documented and maintained on-site. The following facility staff completed operator and/or manager training as required by Permit Condition number 13:
 - Buddy Mayberry, expires 4/26/2015
 - George Tolbert, expires 5/19/2016
 - Scott Parks, expires 5/19/2016
 - Sherrie Christopher, expires 5/19/2016
 - Chris Lewis – Charah, Inc., expires 7/23/2016
 - Jenson Shults – Charah, Inc., expires 7/23/2016
 - Chris Emory– Charah, Inc., expires 7/23/2016
 - Steven Faussete– Charah, Inc., 10/24/2014.
17. The facility annual report was received on July 26, 2013. A total of 30,086.64 tons of waste were placed in the landfill during FY 2012-2013.
18. An annual volume survey was conducted on 5/7/2013. A total of 375,041.71 tons of capacity was reported used as of the survey date.
19. Risk assessment data provided with the facility annual report was updated on 3/7/2014 to correct previously reported data and confirm that there were no potable wells within 500 feet of the edge of waste.
20. The approved operations plan was revised August 3, 2001 (Document I.D. number 14706) and does not appear in the permit. Please contact Larry Frost, Regional Permitting Engineer to update or revise the permit.

Please contact me if you have any questions or concerns regarding this inspection report.



Deborah Aja
Environmental Senior Specialist
Regional Representative
deborah.aja@ncdenr.gov

Phone: 828-296-4702
Asheville Regional Office
2090 US Hwy 70
Swannanoa, NC 28778

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Sent on March 24, 2014 to: George Tolbert, Duke Energy Carolinas, LLC by;	X	Email		Hand delivery		US Mail		Certified No.
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EC: Jason Watkins, Western District Supervisor
Sarah Rice, Compliance Officer
Larry Frost, Regional Permitting Engineer
Kimberlee Hutchinson, PE – Duke Energy Environmental Services