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March 31, 2014

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

Attn: Ms. Deborah Aja

Re: Compliance Inspection Response
Industrial Landfill No. 1
Permit No. 1812-INDUS
Marshall Steam Station
Terrell, North Carolina 28682

Dear Ms. Aja,

Duke Energy is in receipt of the Facility Compliance Inspection Report for the Marshall Steam Station Industrial Landfill No. 1 (ILF1) Landfill (1812-INDUS), dated March 24, 2014. This report was in reference to your inspection of the referenced landfill on February 20, 2014 and March 7, 2014. The purpose of this letter is to address the following Observed Violation referenced in the report:

"On March 7, 2014, leachate collection system pipes 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 pipes had not been cleaned out in 2013 and thus had not been cleaned out at least once a year. This constitutes a violation of 15 NCAC 13B .0203(d).

To correct this violation and be in compliance with 15A NCAC 13B .0203(d), ensure that leachate collection system pipes 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 this report."

Attached, you will find the requested leachate maintenance report for flushing and video inspection of the leachate system in March of 2014.

Additionally, we would like to clarify that while the current ILF1 Landfill Operations Plan language refers to flushing the lines once per year, during the 2013 North Carolina General Assembly Session, House Bill 74, was ratified. House Bill 74 amended North Carolina General Statute 130A-295.6(h)(3) by eliminating the annual cleaning requirement as shown below:

"All leachate collection lines shall be designed and constructed to permanently allow cleaning and remote camera inspection. ~~All leachate collection lines shall be cleaned at least once per year, except that Department may allow leachate collection lines to be cleaned once every two years if:~~

- ~~(i) The facility has continuous monitoring; and~~*
- ~~(ii) the permit holder demonstrates to the Department that the leachate collection lines are clear and functional based on at least three consecutive annual cleanings. Remote camera inspections of leachate collection lines shall occur upon completion of construction, at least once every five years thereafter, and following the clearing of blockages.~~*

Remote camera inspections of the leachate collection lines shall occur upon completion of the construction and at least once every five years. Cleaning of leachate collection lines found necessary for proper functioning and to address buildup of leachate over the liner shall occur".

Future Permit Modifications or Amendments for this facility will include updated language in the Operations Plan to conform with current regulatory guidelines.

Should you have any questions regarding this information, please contact Kim Hutchinson at 336-215-4576 or via e-mail at kim.hutchinson@duke-energy.com.

Respectfully submitted,



Jason M. Allen, SVP
Environmental Health and Safety

Attachments: 2014-03 1812-INDUS Leachate System Maintenance Report

cc (via e-mail): George Tolbert, Duke Energy
Ed Sullivan, Duke Energy
Jason Watkins, NCDENR
Sara Rice, NCDENR
Larry Frost, NCDENR



Video Inspection and Cleaning of Sewer and Storm Drain Systems

2542-B Sam Moss Road • Creedmoor, NC 27522

Scott Hamre
Phone: 919-427-0774

Brian Hicks
Phone: 919-669-4536

Fax: 919-528-4584

3/25/14

To Duke Energy,

This letter is regarding the ILF leachate system at the Marshall Steam Plant. The system has been cleaned off all debris. The line has been videoed to insure it is clean and appears to be in working order with no visible defects.

Should you have additional questions, feel free to contact me.

Thank you,
Brian Hicks



Scaled Plot

Pipe ID 6	City mooreville nc	Street Outfall	Shape Circular		Map #1	Basin
US Manhole CleanoutA	Section Length	Year Laid	Material hdpe		Section Type leach aid	
DS Manhole End	Inspected Length 730.8	Year Renewed	Depth US	Depth DS	Joint Leng...	Diameter 8
Cleaned	Jetting	Situation		Reason		
Date 20140313	Clean Date	Weather Cloudy		General Condition Control		
Start Time 16:26				Remark		
Operator Eddie	Customer Charah/Duke Power	Truck ARGO	Inspection Dir. Downstream		Info	
Operator Comment	P.O. Number	Present	Flow Control		Camera	



CleanoutA

0 ft., Rate: 0, Inspection Begins at Upstream MH
 CleanoutA

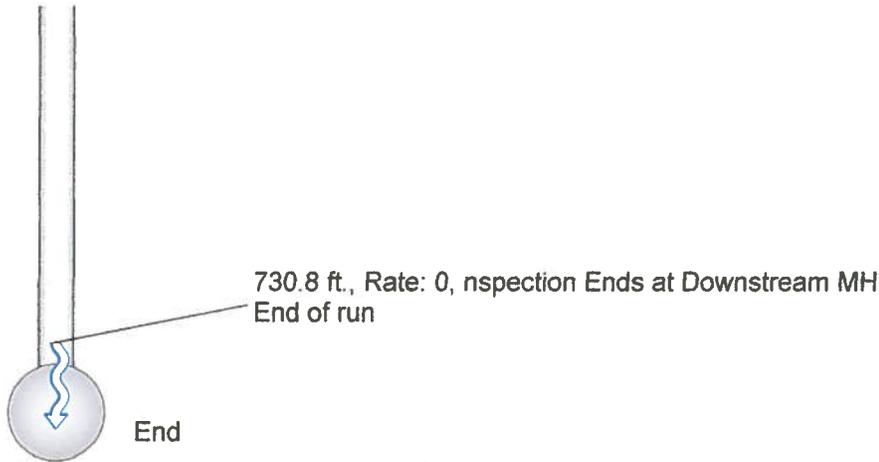
* = clock positions adjusted automatically for reverse inspection

Scale: 1:1200



Scaled Plot

Pipe ID 6	City mooreville nc	Street Outfall	Shape Circular		Map #1	Basin
US Manhole CleanoutA	Section Length	Year Laid	Material hdpe		Section Type leach aid	
DS Manhole End	Inspected Length 730.8	Year Renewed	Depth US	Depth DS	Joint Leng...	Diameter 8



* = clock positions adjusted automatically for reverse inspection



Scaled Plot

Pipe ID 7	City mooreville nc	Street Outfall	Shape Circular		Map #1	Basin
US Manhole CleanoutB	Section Length	Year Laid	Material hdpe		Section Type leach aid	
DS Manhole End	Inspected Length 947	Year Renewed	Depth US	Depth DS	Joint Leng...	Diameter 8

Cleaned	Jetting	Situation		Reason	
Date 20140313	Clean Date			General Condition Control	
Start Time 17:12		Weather Cloudy		Remark	
Operator Eddie	Customer Charah/Duke Power	Truck ARGO	Inspection Dir. Downstream	Info	
Operator Comment	P.O. Number	Present	Flow Control	Camera	



CleanoutB

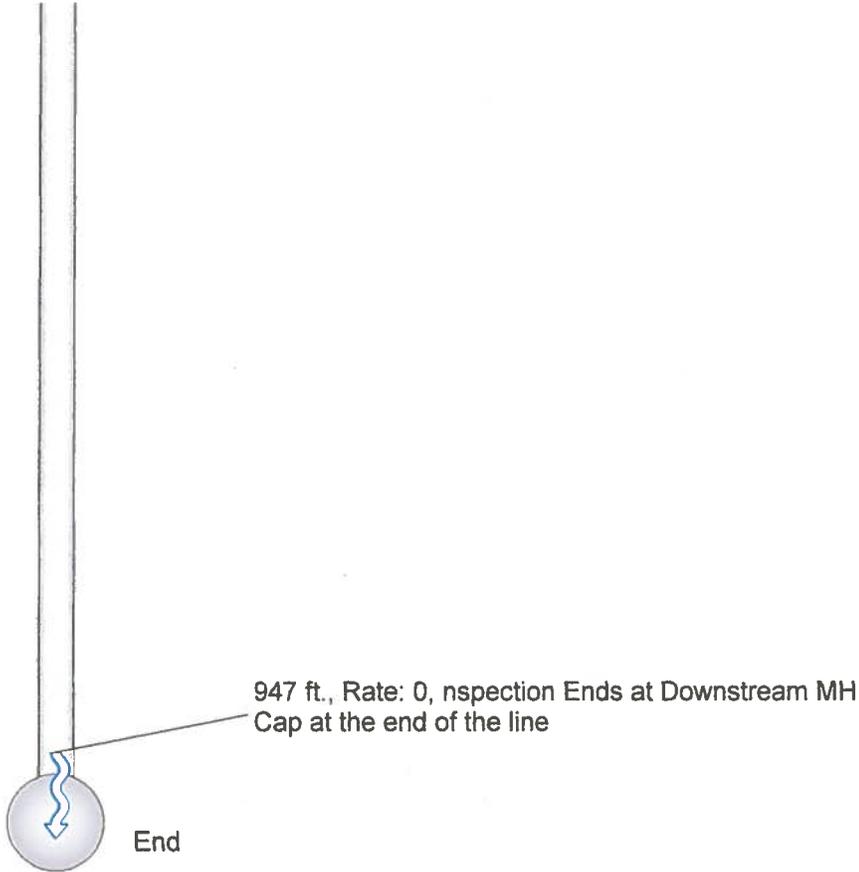
0 ft., Rate: 0, Inspection Begins at Upstream MH
 CleanoutB

* = clock positions adjusted automatically for reverse inspection



Scaled Plot

Pipe ID 7	City mooreville nc	Street Outfall	Shape Circular	Map #1	Basin
US Manhole CleanoutB	Section Length	Year Laid	Material hdpe	Section Type leach aid	
DS Manhole End	Inspected Length 947	Year Renewed	Depth US	Depth DS	Joint Leng... Diameter 8



* = clock positions adjusted automatically for reverse inspection



Scaled Plot

Pipe ID 8	City mooreville nc	Street Outfall	Shape Circular	Map #1	Basin
US Manhole CleanoutC	Section Length	Year Laid	Material hdpe	Section Type leach aid	
DS Manhole End	Inspected Length 823.7	Year Renewed	Depth US	Depth DS	Joint Leng... Diameter 8
Cleaned	Jetting	Situation		Reason	
Date 20140313	Clean Date	Weather Cloudy		General Condition Control	
Start Time 18:08				Remark	
Operator Eddie	Customer Charah/Duke Power	Truck ARGO	Inspection Dir. Downstream	Info	
Operator Comment	P.O. Number	Present	Flow Control	Camera	



CleanoutC

0 ft., Rate: 0, Inspection Begins at Upstream MH
 CleanoutC

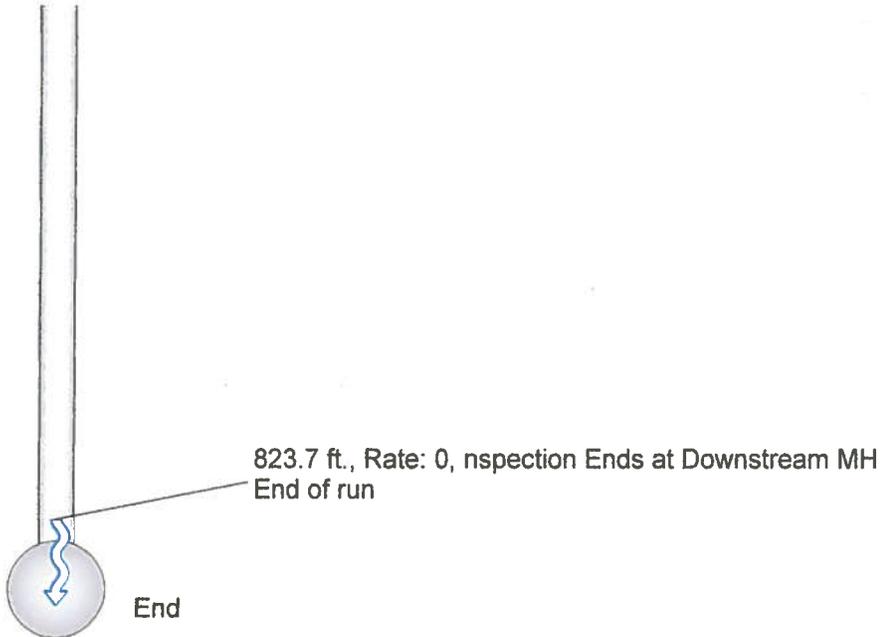
* = clock positions adjusted automatically for reverse inspection

Scale: 1:1200



Scaled Plot

Pipe ID 8	City mooreville nc	Street Outfall	Shape Circular	Map #1	Basin
US Manhole CleanoutC	Section Length	Year Laid	Material hdpe	Section Type leach aid	
DS Manhole End	Inspected Length 823.7	Year Renewed	Depth US	Depth DS	Joint Leng... Diameter 8



* = clock positions adjusted automatically for reverse inspection



Scaled Plot

Pipe ID 9	City mooreville nc	Street Outfall	Shape Circular	Map #1	Basin
US Manhole CleanoutD	Section Length	Year Laid	Material hdpe	Section Type leach aid	
DS Manhole End	Inspected Length 961.8	Year Renewed	Depth US	Depth DS	Joint Leng... Diameter 8
Cleaned	Jetting	Situation		Reason	
Date 20140313	Clean Date	Weather Cloudy		General Condition Control	
Start Time 18:53				Remark	
Operator Eddie	Customer Charah/Duke Power	Truck ARGO	Inspection Dir. Downstream	Info	
Operator Comment	P.O. Number	Present	Flow Control	Camera	



CleanoutD

0 ft., Rate: 0, Inspection Begins at Upstream MH
 CleanoutD

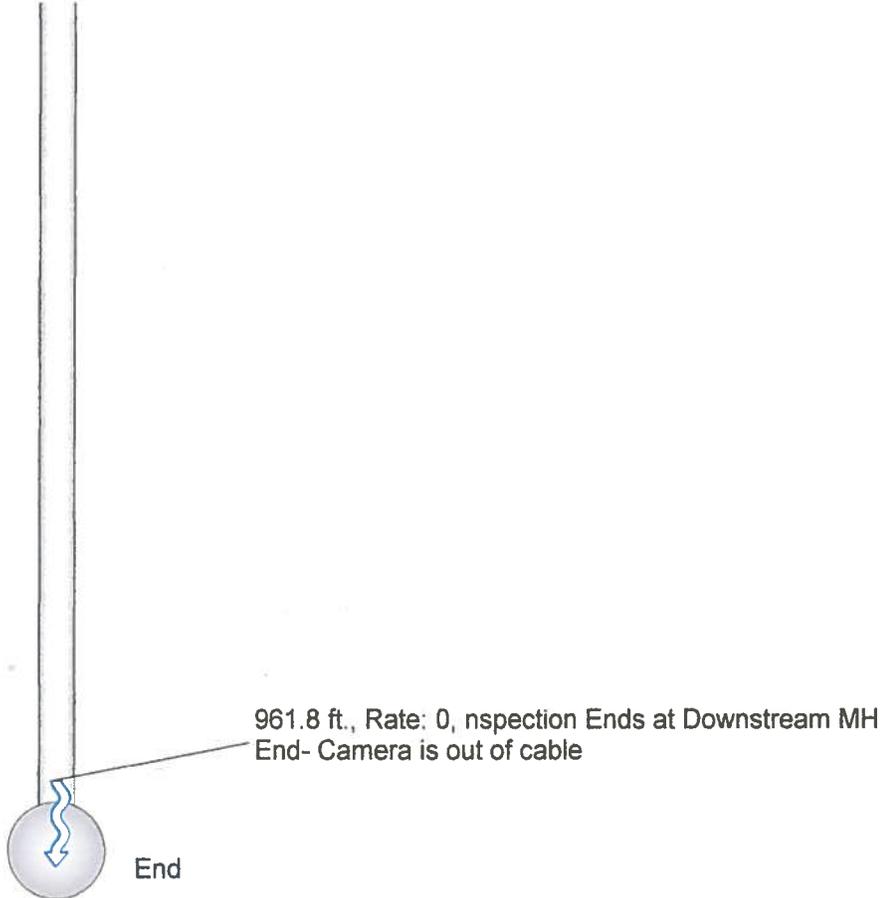
* = clock positions adjusted automatically for reverse inspection

Scale: 1:1200



Scaled Plot

Pipe ID 9	City mooreville nc	Street Outfall	Shape Circular		Map #1	Basin
US Manhole CleanoutD	Section Length	Year Laid	Material hdpe		Section Type leach aid	
DS Manhole End	Inspected Length 961.8	Year Renewed	Depth US	Depth DS	Joint Leng...	Diameter 8



* = clock positions adjusted automatically for reverse inspection

