



North Carolina Department of Environment and Natural Resources  
Division of Waste Management

Beverly Eaves Perdue  
Governor

Dexter R. Matthews  
Director

Dee Freeman  
Secretary

March 18, 2011

Mr. Donald L. Scruggs  
Duke Energy/EHS Field Support-Carolinas  
253 Plant Allen Road  
Belmont, North Carolina 28012

**Re: Proposal to expand Alternative Cover Material Application Area  
Allen Steam Station, Retired Ash Basin (RAB) - Ash Landfill, Permit #36-12  
Proposed ACM: Gorilla Snot**

Dear Mr. Scruggs:

On March 3, 2011, the Division received an electronic correspondence from Chris Ussery, Engineer 1, with Duke Energy titled "Proposal to Expand ACM Application". A meeting was also held at Plant Allen on March 1, 2011 in which the desire to expand the application area for the proposed ACM was expressed. It is currently understood that the proposed ACM was initially applied to an area measuring approximately 21,000 square-feet on November 12, 2010. Subsequent observations of the area were made documenting the performance of the test area. However, the material has not been applied to additional areas and therefore there is no determination of how the material will function when used in multiple lifts.

This letter approves the expansion of the application of the proposed ACM, Gorilla Snot to an area no larger than 2 acres. It has also been determined that the demonstration period be extended until July 13, 2011 in order to determine how the Gorilla Snot will perform when applied in multiple lifts. Be sure to refer to the "Alternative Cover Material Demonstration Authorization Letter" dated July 15, 2010 for specific monitoring and performance requirements for the proposed alternative cover material

If you have any questions, please call me at (704) 235-2144.

Sincerely,

Charles T. Gerstell  
Environmental Senior Specialist  
Solid Waste Section

Cc: Deborah Aja, Western District Supervisor  
Larry Frost, Regional Permitting Engineer