



State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor
William W. Cobey, Jr., Secretary

William L. Meyer
Director

April 7, 1992

Mr. G.J. Oliver, Manager
Environmental Services Section
C P & L
P.O. Box 1551-3A2 CPB
Raleigh, NC 27602

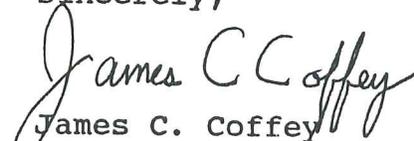
Dear Mr. Oliver:

The Solid Waste Section hereby approves your request to utilize coal ash from the referenced facility as structural fill for expansion of the existing coal stockpile at the plant.

The approval of this reuse is contingent upon utilization of this material in accordance with the specific conditions outlined in the attached letter.

If there are any questions, please contact me at (919) 733-0692.

Sincerely,


James C. Coffey
Solid Waste Section

JCC/mju

cc: Julian Foscue
Jan McHargue
Jeff Rodgers

Carolina Power & Light Company

Technical Services Department

411 Fayetteville Street Mall - P.O. Box 1551 - 3A2 CPB

Raleigh, North Carolina 27602

MAR 02 1992

Mr. Jim Coffey
North Carolina Department of Environment,
Health, and Natural Resources
Division of Solid Waste Management
Post Office Box 27687
Raleigh, North Carolina 27611-7687



RE: Carolina Power & Light Company
Roxboro Steam Electric Plant, Person County
Request for Reuse of Dry Fly Ash
for Structural Fill

Dear Mr. Coffey:

This request is being made as follow-up to your telephone conversation with Mr. Kerry MacPherson of Carolina Power & Light Company (CP&L) on February 6, 1992. It is our understanding that the reuse of coal fly ash from the dry fly ash system at the Roxboro Plant is not covered under the non-discharge permit issued by NCDDEM, but rather is regulated by NC Division of Solid Waste Management. Mr. Tim Donnelly at NC Division of Environmental Management also concurs with our understanding.

CP&L is evaluating several options for structural fill material to be used for a foundation to expand the existing coal pile at the Roxboro Plant. One of the options being considered is the use of coal fly ash from the dry fly ash system at the plant. CP&L feels this is a beneficial as well as an economical utilization of the dry fly ash and is seeking approval to use the ash in this project if this option is chosen. We are proposing to use the dry fly ash as structural fill in an area that is approximately 18" X 1000' X 450'. The area will then be used for coal storage.

To prevent dusting, the ash will be conditioned with water and transported per the operating procedures for the dry fly ash landfill. The ash will be moistened in place to facilitate compaction. Any runoff from this area will be collected in the coal pile runoff retention pond that is currently permitted under NPDES Permit No. NC0003425.

As part of this project approval, CP&L agrees to the following special conditions and the other conditions outlined in Ash Reuse Permit No. WQ0003604:

1. No ash will be used within 100 feet of a potable water supply.
2. No ash will be used except ash that is generated at the Roxboro Plant.

3. Adequate provisions shall be taken to prevent wind erosion and surface runoff/erosion from conveying pollutants from the area onto adjacent property or into surface waters. As noted above, any runoff from the area will be routed through a permitted discharge.
4. No ash shall be used for land reclamation within one (1) foot of the seasonal high groundwater table.
5. Proper records will be maintained tracking disposal activities. The records shall include the following:
 - a) date of ash application,
 - b) type of ash used,
 - c) location of ash application (site, field, or zone number),
 - d) volume of ash applied in tons,
 - e) ash receiver, and
 - f) application ash was used for.
6. The issuance of this approval shall not relieve the Roxboro Plant of responsibility for damages to surface or groundwaters from the operation of this facility.
7. In the event this project is not operated satisfactorily, including the creation of nuisance conditions, the Roxboro Plant shall cease the use of ash for this project and take immediate corrective actions.

We are currently having a TCLP analysis run on a representative dry fly ash sample. A sample is also being analyzed for pH, cadmium, calcium, copper, lead, magnesium, manganese, nickel, phosphorus, potassium, sodium, and zinc per Ash Reuse Permit Condition III.3. Current industry data indicates that dry fly ash does not exceed limits established for toxicity using TCLP analysis; however, these results will be forwarded to you upon receipt.

Your prompt attention to this matter would be greatly appreciated. If you have any questions, please contact Ms. T. L. Poston at 546-4706.

Yours very truly,



G. J. Oliver, Ph. D.
Manager
Environmental Services Section

TLP:dcs (COFFMEM.ROX)
cc: Mr. Tim Donnelly