



**FACILITY COMPLIANCE INSPECTION REPORT**  
**Division of Waste Management**  
**Solid Waste Section**

<b>UNIT TYPE:</b>											
Lined MSWLF	<input checked="" type="checkbox"/>	LCID		YW		Transfer		Compost		SLAS	<b>COUNTY: HAYWOOD</b>  <b>PERMIT NO.: 4407-MSWLF-1993</b> <b>4407-CDLF-DS44-004</b>  <b>FILE TYPE: COMPLIANCE</b>
Closed MSWLF		HHW		White goods		Incineration		T&P	<input checked="" type="checkbox"/>	FIRM	
Closed CDLF	<input checked="" type="checkbox"/>	Tire T&P / Collection		Tire Monofill		INDUS		DEMO		TDDSS	

**Date of Site Inspection:** 3/18/2015, 3/25/15

**Date of Last Inspection:** 8/21/14

**FACILITY NAME AND ADDRESS:**

Haywood County Municipal Solid Waste Landfill  
 State Road 1338, White Oak Community  
 Waynesville, N. C. 28786

**GPS COORDINATES:** N: 35.66343 E: -82.99866

**FACILITY CONTACT NAME AND PHONE NUMBER:**

Name: David Francis, Haywood County Solid Waste Administrator  
 Telephone: (828) 356-2602  
 Email address: [dbfrancis@haywoodnc.net](mailto:dbfrancis@haywoodnc.net)

Name: John Preston, Santek Landfill Manager  
 Telephone: (423) 650-3095  
 Email address: [jpreston@santekenviro.com](mailto:jpreston@santekenviro.com)

**FACILITY CONTACT ADDRESS:**

David Francis  
 Haywood County Solid Waste Department  
 215 N. Main Street  
 Waynesville, NC 28786

**PARTICIPANTS:**

Andrea Keller – NCDENR Solid Waste Section  
 John Preston – Santek Environmental Landfill Manager  
 Kevin Gregg – Santek Environmental, Landfill Operator  
 Cindy Downs – Santek Environmental, Landfill Operator  
 Stephen King – former Haywood County Solid Waste Director  
 David Francis – Haywood County Solid Waste Administrator  
 Ira Dove – Manager, Haywood County  
 Kris Boyd – Code Enforcement, Haywood County  
 Marc Pruitt – Haywood County Erosion Control  
 Fred Walker – NCDENR Land Resources  
 Melissa King – NCDENR Land Resources

**STATUS OF PERMIT:**

Original Permit to Construct: July 22, 1992  
 Original Permit to Operate: October 8, 1993  
 Permit Amendment /Modification PTC Phase 3: May 5, 2009

**FACILITY COMPLIANCE INSPECTION REPORT**  
**Division of Waste Management**  
**Solid Waste Section**

Page 2 of 10

Permit modification – Santek Environmental of North Carolina, LLC as facility operator – November 28, 2011  
Current PTO for service area/annual disposal rate increase: March 5, 2013

**PURPOSE OF SITE VISIT:**

Comprehensive Site Inspection

**STATUS OF PAST NOTED VIOLATIONS:**

None

**OBSERVED VIOLATIONS:**

**15A NCAC 13B .1626** Operational Requirements for MSWLF Facilities (2)(c) *Areas which will not have additional wastes placed on them for 12 months or more, but where final termination of disposal operations has not occurred, shall be covered with a minimum of one foot of intermediate cover.*

On March 18, 2015, during the comprehensive landfill inspection, areas of erosion and exposed wastes were observed on the Phase One intermediate cap.

**Santek Environmental of North Carolina, LLC and Haywood County are in violation of 15A NCAC 13B .1626(2)(c) for failure to maintain the minimum one foot of intermediate cover.**

To correct this violation, and come in compliance with 15A NCAC 13B .1631 (2)(c), the permit holders must, within 30 days, repair the Phase One intermediate slopes exhibiting significant cap erosion, and establish vegetation to restrain future erosion of the cap.

**15A NCAC 13B .1626 (8)(d):** *Leachate shall be contained within a lined disposal cell or leachate collection and storage system. All leachate shall be treated, as required by the receiving facility, prior to discharge. An NPDES permit may be required prior to the discharge of leachate to surface waters, as provided by 40 CFR Parts 258.26 and 258.27.*

During the March 18, 2015, comprehensive landfill inspection, sediment containing waste had visibly flowed outside the lined limits of the Phase Three waste cell. The apparent leachate and sediment flow was observed in several ditches outside the liner system and waste particles reached the sediment basin below Phase Three.

**Santek Environmental of North Carolina, LLC and Haywood County are in violation of 15A NCAC 13B .1626 (8)(d) in that leachate was released outside of the lined disposal cell.**

To correct this violation, and come in compliance with 15A NCAC 13B .1626 (8)(d), the permit holders must investigate and determine the extent of the leachate release, as instructed by the Section compliance hydrogeologist. Further action may be required by the Division.

Ervin Lane

Compliance Hydrogeologist

NC Department of Environment and Natural Resources

Division of Waste Management - Solid Waste Section

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## FACILITY COMPLIANCE INSPECTION REPORT

### Division of Waste Management Solid Waste Section

Page 3 of 10

**15A NCAC 13B .1631** Ground-Water Monitoring Systems *(b) Monitoring wells shall be designed and constructed in accordance with the applicable North Carolina Well Construction Standards as codified in 15A NCAC 2C.*

*(2) The monitoring wells and piezometers shall be operated and maintained so that they perform to design specifications throughout the life of the monitoring program.*

15A NCAC 02C .0108 STANDARDS OF CONSTRUCTION: WELLS OTHER THAN WATER SUPPLY *(k) All non-water supply wells, including temporary wells, shall be secured with a locking well cap to ensure against unauthorized access and use.*

On March 18, 2015, during the comprehensive landfill inspection, multiple monitoring wells were observed with the locks removed (zip-ties in place of locks).

**Santek Environmental of North Carolina, LLC and Haywood County are in violation of 15A NCAC 13B .1631(b)(2) for failure to maintain and operate monitoring wells to design standards.**

To correct this violation, and come in compliance with 15A NCAC 13B .1631 (b)(2), the permit holders must, within 30 days, ensure that all non-water supply wells, including temporary wells, are secured with locks/locked caps.

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 also 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. On March 18, 2015, a comprehensive facility inspection was conducted at the White Oak MSWLF (WOLF). Participants included NCDENR DEMLR staff in response to complaints of erosion and sediment leaving the facility site along with County representatives.
2. Initial site activities, at approximately 8:15 a.m., included the observation of conditions at the working face. Facility employees were engaged in picking up windblown material that had left the Phase Three liner/waste limits. There was a noticeable increase in windblown materials observed, in comparison with previous site inspections. **Be advised that all windblown material resulting from the operation shall be collected and returned to the lined waste cell at the conclusion of each day of operation.**
3. The toe of the working face exhibited significant erosion, sediment movement, and waste movement (leachate flow) outside the lined Phase Three waste cell. This condition was brought to the attention of Mr. Gregg who contacted Mr. Preston for instructions on how to contain and begin repair of the area.

Photos below indicate the flow from the waste cell to the surface water ditch and the surface water ditch (s) to a lower sediment basin:

FACILITY COMPLIANCE INSPECTION REPORT  
Division of Waste Management  
Solid Waste Section



Waste and flow (leachate and sediment) past the EOW marker and in the surface water drainage channel.



Continuing along channel.

**FACILITY COMPLIANCE INSPECTION REPORT**  
**Division of Waste Management**  
**Solid Waste Section**



Entering a drainage point that discharges to a lower sediment basin.



Lower sediment basin.



Waste visible.

**FACILITY COMPLIANCE INSPECTION REPORT**  
**Division of Waste Management**  
**Solid Waste Section**

Page 6 of 10

4. The path of the leachate, sediment, and waste flow is indicated below (Googlemap, older Phase Three Photo):



5. The records review was conducted at the scale house office with Ms. Downs.
- a. NPDES Permit (COC NCG120047 stormwater general permit) and documentation (along with rainfall recordation) was available for review.
  - b. Waste determination records were available and no issues were noted. Waste acceptance (tonnages) records were reviewed. The facility is permitted to receive ~470 tons per day or 146,000 tons per year. The facility is on track to meet or exceed this amount and is aware of the waste acceptance limits for this landfill.
  - c. Asbestos records were available for review. GPS location data on waste placement is kept. Reviewed records from 7/10/14-3/11/15.
  - d. Financial Assurance – confirmed that FA was under review with the Section during follow-up conversation with RCO (Sarah Rice, 3/25/15).
  - e. Waste screening records were reviewed. Determined that the facility is required to screen 1% (not defined if this is 1% of tonnage, loads, etc.). Currently the facility screens ~3 loads/day. Please note that waste screening records are expected to accurately indicate what is being discovered, and removed, during the event. This includes incidental wastes that the facility receives.
  - f. The current permit (3/5/2013) and Operations Plan (approved 12/11/14) were on site and available for review. Alternative Daily Cover options approved for this facility include tarps and a mulch/soil mix (approved 5/6/9).
  - g. Leachate pump and haul records were available for review. There are three sump/purge locations at the facility that are “pumped as needed” and are visually inspected. Leachate lines were inspected and cleaned in November, 2014 (report not received yet at facility). Leachate is hauled to the Town of Waynesville WWTP.
  - h. Groundwater and landfill gas (LFG) monitoring reports were available for review. LFG monitoring had occurred quarterly and all wells and structures were non-detect.
  - i. Training records (landfill operator certifications) were reviewed. The following operators were

**FACILITY COMPLIANCE INSPECTION REPORT**  
**Division of Waste Management**  
**Solid Waste Section**

Page 7 of 10

certified on 8/10/13 (expires 8/9/16): Cindy Downs, Kevin Gregg, Rick Kirkpatrick, and Bobby Stokely. John Preston has MOLO certification from 4/26/12 (expires 4/26/2015). Additional internal training records were kept for: confined space entry, fire extinguisher training, and emergency response.

- j. Tires are not accepted at the landfill as a normal operation. Tires removed from the working face are delivered to the permitted 44-08T facility in Waynesville.
6. Following the arrival of NCDENR DEMLR and Haywood Co. personnel, a tour/inspection of the site was conducted. Access roads were well maintained, facility is gated with required signage at the front entrance. It is recommended, as a general best management practice, that signage involving waste bans be posted at the scale house to assist in pre-screening discussions and education.
7. Land clearing materials, brush, etc. are accepted and staged for grinding at the facility. The material had recently been ground. Please note that some wood and vegetative material appeared to have been pushed down the sloped area of this location – this material must be removed and handled properly, including disposal where necessary. Some unacceptable material was noted in this area (painted wood, plastics) – this material must be removed, containerized, and disposed of at the working face.



3/18/15 (all)

8. The closed C&D Landfill appeared to be maintained, vegetation was established and no significant erosion was noted. EOW markers were in place. During previous inspection in 2014, the damaged leachate cleanout pipe was discussed (with J. Preston). The pipe was still in need of repair/capping.



**FACILITY COMPLIANCE INSPECTION REPORT**  
**Division of Waste Management**  
**Solid Waste Section**

Page 8 of 10

9. As part of the DEMLR inspection, sediment basins and erosion control measures were inspected and the history of the site was discussed in detail. The sediment basin on the western side of the property, north of the CDLF cell, has incurred some erosion damage. Please correct, repair, and maintain these features in accordance with the NCDENR DEMLR recommendations and requirements.
10. No issues were noted at the leachate collection pond. In the course of the inspection, several wells were observed, similar to the photo below, with zip-ties rather than locks. **Please see the “observed violation” section above for well-locking requirements.**



11. Further inspection of the working face and the intermediate slopes on Phase One were conducted with J. Preston present (after 2pm). The following items were discussed in detail:
- a. Due to the fill sequence and placement of soil beyond the EOW markers there were concerns about actual edge-of-waste. The records indicated (Ops Plan) that the liner is 9-feet interior to the EOW posts (yellow wood markers for this phase of the landfill). The photo below shows the access route for commercial vehicles, the EOW liner, and the soil mixed with waste (surface) crossing or potential crossing outside of the liner system. **Please work to correct this. All waste, buried, surficial, or windblown must be contained within the limits of the liner system.**



- b. The area below the working face was discussed. J. Preston stated that by the end of the day, the area would be contained with berms and check dam(s) in place and that they would work top down to the sediment basin. A. Keller noted that this was considered a violation (see “observed violation” section above) and that further instruction on possible remediation and/or sampling requirements would come from Mr. Ervin Lane.
- c. It appeared as though windblown waste issues were potentially becoming an issue for the facility.

**FACILITY COMPLIANCE INSPECTION REPORT**  
**Division of Waste Management**  
**Solid Waste Section**

Page 9 of 10

**Some windblown was noted in upper branches of trees and across the closed landfill cells. Please note that windblown wastes must be returned to the working face by the end of each day.**

- d.** The intermediate slope of the Phase One portion of the MSWLF exhibited significant erosion. In some areas the rills were deep enough to show exposed waste (see “observed violation” section above). Mr. Preston stated that the rills and exposed waste would be covered by the end of day – this area was addressed immediately and some repairs were observed prior to leaving the site. **These areas, along with other areas along the top and sides of Phase One, require significant attention and improved vegetative cover.**



**FACILITY COMPLIANCE INSPECTION REPORT**  
**Division of Waste Management**  
**Solid Waste Section**

Page 10 of 10

12. Corrective actions for several observed violations are noted within this report. Please communicate with the Section regarding plans and time frames for repairs or operational fixes associated with the items in this report.

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

Phone: 828-296-4700

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Andrea Keller  
Environmental Senior Specialist  
*Regional Representative*

Sent on: April 14, 2015	Email: <a href="mailto:jpreston@santekenviro.com">jpreston@santekenviro.com</a> ; <a href="mailto:idove@haywoodnc.net">idove@haywoodnc.net</a>	Mail: David Francis Haywood County Solid Waste 215 N. Main Street Waynesville, NC 28786  Matt Dillard, VP of Operations Santek Environmental of North Carolina, LLC 650 25 <sup>th</sup> Street NW Suite 100 Cleveland, TN 37311	<b>Certified No.</b>  <b>7006 2150 0005 2458 9327</b> (County) and <b>7014 0510 0000 4466 1346</b> (Santek)
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ec: Jason Watkins, Field Operations Branch Manager – Solid Waste Section  
Deb Aja, Western District Supervisor – Solid Waste Section  
Sarah Rice, Compliance Officer – Solid Waste Section  
Jessica Montie, Compliance Officer – Solid Waste Section  
Ervin Lane, Compliance Hydrogeologist – Solid Waste Section  
Ira Dove, Haywood County Manager  
John Preston, Santek Environmental – Landfill Manager  
Fred Walker, NCDENR DEMLR