



DIVISION OF  
ADMINISTRATION & FINANCE

TO: Mr. Troy Harrison  
Environmental Specialist  
NCDENR-DWM- Solid Waste Section

FROM: Roger F. Turk   
Grounds Superintendent

DATE: December 17, 2014

**RECEIVED**

DEC 19 2014

SOLID WASTE SECTION  
ASHEVILLE REGIONAL OFFICE

SUBJECT: Facility Compliance Audit Report Response for Western Carolina University's MSW Landfill

This memo is in response to the report you sent detailing issues from your September 18, 2014 field visit of our site received November 25, 2014.

Notice of violations listed in the report:

Violation 15A NCAC 13B.0510 (c), our response: Since the 1<sup>st</sup> notice of violation for kudzu on the site the University has placed goats on the site on 3 different occasions (August 2011, Sept. 2012 and Sept. 2013) for the purpose of dealing with the kudzu issue. The University has invested over \$9000.00 in the process in an attempt to comply with the noted issue.

Further in early April 2014 the University rented a bulldozer to try to remove the dormant kudzu from the slopes with plans to over seed the area. This procedure had limited success due to the steep slopes and the dormant vines which caused the unit to loose traction and create more problems than it solved. After this process was complete in late April 2014 the University hired a hydro-seeding company to perform a hydro-seeding application over 2 ½ acres of the site. A mixture of grass seed, lime and fertilizer was applied at a cost of \$3,800.00.

The intent by the University was to then control the kudzu via selective herbicide applications as the kudzu began to actively grow in the spring. The University staff made 3 applications of selective herbicide on the actively growing kudzu however during the 3<sup>rd</sup> planned application the spray unit broke down. Due to the age of the unit (1996 model) it was difficult to find repair parts until fortunately a source was found via the internet in California. The parts and the repairs to the unit had just been completed prior to your site visit in September. By this time the kudzu was out of control and would soon to be dormant again. While we were unable to spray the kudzu we did utilize chain saws to remove woody saplings in the area.

Facilities Management

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Plan of action to remove kudzu: The University is currently working with chemical sales representatives to determine the most effective chemical control of mature well established kudzu. There is a new product that we are exploring that indicates it can be applied on bare stems. If the references check out we will begin applying in February 2015. Even if it does check out but is not effective during the dormant months as hoped we will begin applications again in the spring of 2015. We will then perform reapplication throughout the spring and summer in an attempt to control the plant. Then in the fall of 2015 when weather is conducive for good grass seed germination and establishment we will perform a hydro-seeding application where required to achieve required acceptable coverage. If the new chemical works as indicated during the dormant months then we will perform the hydro-seeding application in early spring with any follow up application in the fall.

Plan of action for placement of "edge of waste markers": The University will purchase and place metal "T-Bar" fence stakes at the waste edge. The stakes will be painted with white for clear observation. This work will be complete before the end of January 2015.

The University is willing to make every effort to meet your guidelines. If you can provide us with any ideas or contacts on how to best deal with a large mature kudzu stand please forward that to me. I'd greatly appreciate the help.

Cc: Jason Watkins  
Deb Aja  
Sarah Rice  
Jackie Drummond  
Joe Walker