

**FACILITY COMPLIANCE INSPECTION REPORT**  
**Department of Environmental Quality**  
**Division of Waste Management - Solid Waste Section**

<b>UNIT TYPE:</b>											
Lined MSWLF		LCID		YW		Transfer		Compost		SLAS	<b>COUNTY:</b> Halifax <b>PERMIT NO.:</b> 4204-INDUS-1994 <b>FILE TYPE:</b> COMPLIANCE
Closed MSWLF		HHW		White goods		Incin		T&P		FIRM	
CDLF		Tire T&P / Collection		Tire Monofill		Industrial Landfill	<b>X</b>	DEMO		SDTF	

**Date of Site Inspection:** January 15, 2016    **Date of Last Inspection:** August 10, 2015

**FACILITY NAME AND ADDRESS:**

Halifax Coal Ash Landfill  
 921 Liles Road  
 Halifax, NC 27839

**GPS COORDINATES:** N: 36.38029 W: -77.81138

**FACILITY CONTACT NAME AND PHONE NUMBER:**

Ed Stanfield, Tel- 252-586-7516, [solidwaste@schoollink.net](mailto:solidwaste@schoollink.net)  
 Greg Griffin, Tel- 252-583-1451, [griffing@halifaxnc.com](mailto:griffing@halifaxnc.com)

**FACILITY CONTACT ADDRESS:**

Halifax County Industrial Coal Ash Landfill  
 PO Box 70  
 Halifax, NC 27839

**PARTICIPANTS:**

Ed Stanfield, Halifax County, Landfill Supervisor  
 Greg Griffin, Halifax County, Director of Public Utilities  
 Shawn McKee – NCDENR, Solid Waste Section

**STATUS OF PERMIT:**

Active. Permit 4204-INDUS-1994 was issued on March 27, 2012 and will expire on March 27, 2017.

**PURPOSE OF SITE VISIT:**

Partial Inspection – Follow-up

**STATUS OF PAST NOTED VIOLATIONS:**

**15A NCAC 13B .0505 (3)(b)** *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*

During the August 10, 2015 inspection, significant erosion was observed on side slopes such that coal ash had washed into perimeter ditches and had washed into the sediment basin. On October 20, 2015 the Division of Waste Management, Solid Waste Section (Section) received *Halifax County Ash Monofill (NC Permit 42-04-INDUS-1994), Conceptual Filling and Intermediate Cover Plan*, prepared for Halifax County, prepared by Smith-Gardner. On October 22, 2015, the Solid Waste Section concurred with the plan. The northern slope of the landfill has had soil cover placed, and been graded and seeded per the Cover Plan. Other slopes have been regraded to reduce erosion. **Continue to place intermediate cover on all slopes in accordance with the Cover Plan. Unresolved.**

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*15A NCAC 13B .0203(d) states "By receiving solid waste at a permitted facility, the permittee(s) shall be considered to have accepted the conditions of the permit and shall comply with the conditions of the permit."*

*Ops Plan 2.5.6.2 states "unless suitable vegetation can be established on the surface of the ash a 12-inch layer of soil cover should be placed over the ash on all outer side slopes. This intermediate cover should be seeded immediately and graded such that all precipitation run-off is channeled to the surface water systems."*

The facility is in violation of the above rule in that it failed to prevent the erosion of the side slopes by not providing soil cover and/or permanent vegetation as noted in Ops Plan 2.5.6.2.

The northern slope of the landfill has had soil cover placed, and been graded and seeded per the Cover Plan. Other slopes have been regraded to reduce erosion. **Continue to place intermediate cover on all slopes in accordance with the Cover Plan. Unresolved.**

#### **OBSERVED VIOLATIONS**

None.

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. The coal ash landfill is one of several units located at the facility owned by Halifax County. The other units include a construction and demolition landfill, a municipal solid waste (MSW) transfer station, and a closed unlined MSW landfill.
2. The Permit to Operate shall expire March 27, 2017. Pursuant to 15A NCAC 13B .0201(g), no later than November 27, 2016, the permittee must submit a request to the Section for permit review and must update pertinent facility plans including, but not limited to, the facility operation and waste screening plans.
3. The coal ash landfill is permitted to receive only coal combustion by-products in accordance with the approved plan. Municipal solid waste, construction and demolition debris waste, land clearing and inert debris, hazardous waste, special waste, and liquid waste are prohibited from disposal in the coal ash landfill.
4. The landfill is permitted to receive waste only from the coal-fired power plant in Weldon, NC, which is currently owned by the Westmoreland Coal Company. The Westmoreland plant in Weldon is not currently running at full capacity, such that ash disposal needs are less, and vary by seasonal demand for electricity. The amount of coal ash being brought to the industrial landfill has fallen off significantly due to the cutback in operating time at the plant. A total of 41,569.55 tons of coal ash were accepted during FY14-15. At the time of the inspection, ash had not been received at the landfill during the previous weeks.
5. An inspection of monitoring points with previously noted concerns was conducted during the inspection. Observations and necessary corrections are noted below:

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Monitoring Well ID	Well Tag	Concrete Pad	Comments
<b>Groundwater Monitoring Wells</b>			
MW-8	Yes	Yes	<b>has label, but not marked as MW-8 / clearly identifying the well as “MW-8” is recommended</b>
MW-10	Yes	Yes	outer metal casing has been repaired; concrete pad integrity has been verified
MW-11	Yes	Yes	concrete pad integrity has been verified
MW-12	Yes	maybe	outer metal casing has been repaired; concrete pad integrity has been verified
MW-17	No	No	permanent metal ID tag has been affixed; <b>concrete pad needs repair</b>
<b>Surface Water Locations</b>			
SW-3	NA	NA	<b>needs permanent signage marking consistent sample location; verify sample location point</b>
Basin 1	NA	NA	<b>needs permanent signage marking consistent sample location</b>
<b>Sediment Basin Sample Locations</b>			
SS-1	NA	NA	<b>needs permanent signage marking consistent sample location; verify sample location point</b>
SS-2	NA	NA	<b>needs permanent signage marking consistent sample location; verify sample location point</b>

6. According to 15A NCAC 02C .0108(g) “The well shall be constructed in such a manner that water or contaminants from the land surface cannot migrate along the borehole annulus into any packing material or well screen area.” **The well pad for MW-17 must be repaired in a manner prevents migration of contaminants from the land surface.** The broken well pad concrete should be removed and replaced. I would recommend a well pad of approximately 2 feet square and 4 inches deep.
7. No unpermitted waste was observed in the landfill during the inspection.
8. When ash is received by the facility, it is placed in Cells 1 and 2. Spreading and compaction of the ash is performed with a D6 bulldozer.
9. Edge-of-waste markers were in place and being maintained.
10. Dust control is done using a water truck which is kept onsite. During periods without significant precipitation, facility staff should be extra diligent in monitoring and addressing dusting on and around the working face.
11. During the August 10, 2015 inspection, significant erosion was observed on side slopes such that coal ash had washed into perimeter ditches and had washed into the sediment basin. On October 20, 2015 the Division of Waste Management, Solid Waste Section (Section) received *Halifax County Ash Monofill (NC Permit 42-04-INDUS-1994), Conceptual Filling and Intermediate Cover Plan*, prepared for Halifax County, prepared by Smith-Gardner. On October 22, 2015, the Solid Waste Section concurred with the plan. The northern slope of the landfill has had soil cover placed, and been graded and seeded per the plan. Other slopes have been regraded to reduce erosion. **Continue to place intermediate cover on all slopes in accordance with the Cover Plan.**

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Northern slope of landfill has been covered and seeded per the Intermediate Cover Plan.

12. During the August 10, 2015 inspection, Ash was observed at the inlet to the sediment basin. A contractor has been hired to remove ash from the sediment basins to restore them to their designed capacity.
  
13. As a reminder, per Permit to Operate, Condition # 59 “Ash which has been placed to final elevations around the perimeter of the facility must be covered with a minimum of 12 inches of soil. Final cover and seeding must be implemented within 30 days of an area reaching final grade.” Additionally, per 15A NCAC 13B .0505(3)(c) “After final termination of disposal operations at the site or a major part thereof, or upon revocation of a permit, the area shall be covered with at least two feet of suitable compacted earth.”

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

Phone: 919-707-8284

Environmental Senior Specialist  
***Regional Representative***

<b>Sent on:</b> January 26, 2016		Email: X		Hand delivery		US Mail		Certified No. <input type="checkbox"/>
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- Copies:
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  - Ed Mussler, Permitting Branch Head, Solid Waste Section
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