



FACILITY COMPLIANCE INSPECTION REPORT
Division of Waste Management
Solid Waste Section

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

Date of Site Inspection: June 2, 2016 **Date of Last Inspection:** January 15, 2016

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
 Greg Griffin, Tel- 252-583-1451, 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 – NCDEQ, Solid Waste Section
 Mary Whaley – NCDEQ, 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:

Comprehensive Inspection

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. The western slope has been prepared for placement of intermediate cover (identified as Sequence No. 3B in 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. The western slope has been prepared for placement of intermediate cover (identified as Sequence No. 3B in 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

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.

1. 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.
2. 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.
3. The facility operator must complete an approved operator training course in compliance with G.S. 130A-309.25. The following facility staff are Certified Landfill Operations Specialists:

Edgar Stanfield, LF-2001362, expires June 13, 2016

Randy Pike, LF-2015025, expires May 20, 2018

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 since the landfill was first permitted due to the cutback in operating time at the plant. Since July 1, 2015, a total of 4,846.19 tons of coal ash and 3,518.23 tons of ash "sludge" has been disposed of at the landfill.

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5. Groundwater, surface water, basin effluent, and stream sediment locations are sampled semi-annually. The last sampling events occurred on August 24, 2015 and February 25, 2016. Results from these events were reviewed during the inspection. Sampling results were consistent with previous events; no concerns were noted.
6. Repairs to monitoring points with previously noted concerns were discussed and noted during the inspection. Correction have been made as noted below:

4204-INDUS-1994			
Monitoring Well ID	Well Tag	Concrete Pad	Comments
Groundwater Monitoring Wells			
MW-8	Yes	Yes	Well tag has been stamped with an "8"
MW-17	No	No	Concrete pad has been repaired
Surface Water Locations			
SW-3	NA	NA	Sign has been posted at sample location
Basin 1	NA	NA	Sign has been posted at sample location
Sediment Basin Sample Locations			
SS-1	NA	NA	Sign has been posted at sample location
SS-2	NA	NA	Sign has been posted at sample location

7. No unpermitted waste was observed in the landfill during the inspection.
8. Ash is currently being 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 performed consistent with the facility's Fugitive Dust Control Plan. During periods without significant precipitation, facility staff should be extra diligent in monitoring and addressing dusting on and around the working face.
11. Heavy rains occurred the night before the inspection. Erosion was observed on side slopes such that coal ash had washed into perimeter ditches. 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. The western slope has been prepared for placement of intermediate cover (identified as Sequence No. 3B in the Cover Plan). Intermediate cover is scheduled to be placed by the end of July 2016. 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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Toe of the western slope; being prepared for cover



Erosion on southern slope after heavy rains

12. 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.”

13. The sediment basin appeared to be functioning as designed at the time of the inspection. Continue to monitor the inlet to the basin for any signs of ash migration.

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

Shawn McKee
Environmental Senior Specialist
Regional Representative

Phone: 919-707-8284

Sent on: June 9, 2016		Email: X		Hand delivery		US Mail		Certified No. []
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- Copies:
- Ellen Lorscheider, Section Chief, Solid Waste Section
 - Ed Mussler, Permitting Branch Head, Solid Waste Section
 - Jason Watkins, Field Operations Branch Head, Solid Waste Section
 - Elizabeth Werner, Permitting Hydrogeologist, Solid Waste Section
 - Larry Frost, Engineering Project Manager, Solid Waste Section
 - Jessica Montie, Compliance Officer, Solid Waste Section