



FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

UNIT TYPE:

Lined MSWLF		LCID		YW		Transfer		Compost		SLAS		COUNTY: Alamance PERMIT NO.: 01-01 FILE TYPE: COMPLIANCE
Closed MSWLF	X	HHW		White goods		Incin		T&P		FIRM		
CDLF		Tire T&P / Collection		Tire Monofill		Industrial Landfill		DEMO		SDTF		

Date of Audit: 12/21/2010

Date of Last Audit: 3/9/2010

FACILITY NAME AND ADDRESS:

Closed Alamance County Landfill
 Alfred Road

GPS COORDINATES: **N:** 36.0150 **E:** -79.3496

FACILITY CONTACT NAME AND PHONE NUMBER:

Greg Thomas, Solid Waste Director 336-376-0411
 Email: Gregory.thomas@alamance-nc.com

FACILITY CONTACT ADDRESS:

Alamance County Solid Waste Management Facility
 2701 Austin Quarter Road
 Graham, North Carolina 27253

Craig F. Honeycutt, County Manager
 Alamance County
 124 West Elm Street
 Graham, NC 27253

AUDIT PARTICIPANTS:

Greg Thomas, Alamance County Solid Waste Director
 Rodney Foust – Alamance Co. Landfill Operations Supervisor
 Chris Marriott, NC DENR-Solid Waste Section

STATUS OF PERMIT:

Closed Facility-effective date of closure: May 14, 1996

PURPOSE OF AUDIT:

Follow-up Audit to 3/9/2010 NOV

NOTICE OF VIOLATION(S):

None

You are hereby 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 Statute or Regulations. For the violation(s) noted here, you may 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.

FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

Page 2 of 2

STATUS OF PAST NOTED VIOLATIONS:

15A North Carolina Administrative Code 13B .0510(c) requires that “when a solid waste disposal site has been closed in accordance with the requirements of the Division, future necessary maintenance and water quality monitoring shall be the responsibility of the owner and the operator and shall be specified in the closure letter.”

The July 5, 1995 Closure Letter, in the POST CLOSURE CONDITIONS section item #1 (Management of Landfill Gas), states that “The owner and/or operator shall take the measures necessary to ensure that the closed site shall continue to meet the design standards for landfill gas found in Rule .0503(2)(a).”

Rule .0503(2)(a) states: “The concentration of explosive gases generated by the site shall not exceed:

- (i) twenty-five percent of the limit for the gases in site structures (excluding gas control or recovery system components; and
- (ii) the lower explosive limit for the gases at the property boundary;”

The January 12, 1994 letter in which the Solid Waste Section responded to the County’s request to close the landfill approved of the submitted Post-Closure Plan. This letter stated in the Post-Closure Conditions section: “Alamance County shall monitor for explosive gases in accordance with 15A NCAC .0503. The monitoring period shall continue for a ten year period unless the county can demonstrate a long term downward trend in explosive gas levels.”

Alamance County has not shown that any explosive gas monitoring has ever been performed at the closed municipal solid waste facility as required in the Post-Closure Conditions (dated 1/12/1994) or in the closure letter (dated 7/5/1995). **Therefore, Alamance County is in violation of 15A NCAC 13B .0510(c) for failing to perform the necessary maintenance at a solid waste disposal site that has been closed in accordance with the requirements of the Division, as specified in the closure letter, in accordance with the requirements of Rule .0510(c).**

In order to achieve compliance with 15A NCAC 13B .0510(c), within 90-days of receipt this report, Alamance County must provide evidence that methane monitoring has been performed as required in the closure letter, or submit a new permanent methane monitoring plan must be submitted to the Section for approval. The methane monitoring plan should satisfy all conditions of Rule 15A NCAC 13B .0503(2)(a)(i) and (ii). Please submit copies of the methane monitoring plan to:

Ed Mussler, P.E., Permitting Branch Head
Division of Waste Management, Solid Waste Section
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

On May 17, 2010, Municipal Engineering Services Co., Inc, on behalf of Alamance County submitted a Methane Monitoring Plan for the Closed Alamance County Landfill. The Solid Waste Section is currently reviewing this submittal.

As of December 21, 2010 the violations have been corrected. Please continue to monitor quarterly until a full review and approval of the Monitoring Plan is completed by the Solid Waste Section. The Section issued comments on the submitted plan on January 5, 2011.

AREAS OF CONCERN AND COMMENTS:

- 1) This inspection was completed to resolve the NOV issued on March 9, 2010 for failure to have a landfill gas monitoring plan.
- 2) The facility is a closed MSW landfill which ceased operations on October 4, 1993.
- 3) Several of the monitoring probes were inspected at the facility. The inspected monitoring probes were 1-inch PVC. Probes were labeled with a black marker identifying number of each monitoring probe.
- 4) In the Monitoring Plan and submitted monitoring report a total of 21 monitoring probes are identified. During

FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

Page 3 of 3

this inspection, a probe in the approximate location of MP-21 was labeled as “MP-22. **Please verify the numbers on each probe and ensure that the field labels match the map submitted in the plan.**

- 5) Several of the monitoring probes were found to a shut off valve similar to MP-1 in the picture below on the right. However, some monitoring probes did not have any shut off valves similar to MP-7 in the picture below on the left. **Please install a stopcock/shut-off valve on all monitoring probes as suggested in the Section’s guidance document which can be found here:** http://portal.ncdenr.org/c/document_library/get_file?uuid=da699f7e-8c13-4249-9012-16af8aefdc7b&groupId=38361



- 6) Monitoring of the probes occurred on the following dates: March 31, 2010, April 19, 2010, July 6, 2010, and October 25, 2010. Reported results show that methane has been detected in the monitoring probes, but not at levels above the LEL.

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

Chris Marriott
 Environmental Senior Specialist
Regional Representative

Phone: 336-771-5090

Delivered on : <u>January 06, 2011</u> by	Hand delivery	<input checked="" type="checkbox"/>	E Mail	Certified No. [_____]
---	---------------	-------------------------------------	--------	-------------------------

- cc: Mark Poindexter, SWS Field Operations Branch Supervisor-via email
 Jason Watkins, SWS Central District Supervisor-via email
 Donald Herndon, SWS Compliance Officer-via email
 Greg Thomas, Alamance County Solid Waste Director-via email
 Ed Mussler, SWS Permitting Branch Supervisor-via email
 Elizabeth Werner, SWS Permitting Branch Hydrogeologist-via email