

COASTAL REGIONAL SOLID WASTE MANAGEMENT AUTHORITY

A COASTAL PARTNERSHIP
SERVING CARTERET, CRAVEN & PAMLICO COUNTIES

October 24, 2000

Mr. Bobby Nelms, Waste Management Specialist
Department of Environment and Natural Resources
943 Washington Square Mall
Washington, N.C. 27889

Re: Compliance Landfill Audit
Permit # 25-04

Fac/Perm/Co ID #	Date	Doc ID#
2504 ^{ny}	08 10 4 2001	DIN 14722

Dear Mr. Nelms:

This letter will acknowledge receipt of your letter of October 13, 2000 along with the audit report from the September 27, 2000 visit. This letter will also serve as our response to the violations noted in the audit.

A.

1. We acknowledge that there was a small amount of leachate running over the rain cover in the new cell. This was the result of daily cover material that had eroded in the heavy rains (4+ inches) from the remnants of Hurricane Helene a few days prior to the visit and breached the operational berm between the working face and the rain cover. This has been repaired and no leachate is escaping at this time.
2. We acknowledge that there were some leachate seeps on the IRL. As was discussed at the time of the audit, we had already issued a notice to proceed to the contractor that is closing the IRL, with one of the first tasks to be repair of the seeps. This contractor is now on site and work is in progress. We believe that our best course of action for addressing the seeps is to allow the contractor to proceed with his work.

- B. We have located hazard training records for landfill personnel through 1997. While training has taken place since that time, we were remiss in not recording that such training had taken place. Training records will be kept from this point forward.
- C. We have leachate collection system inspections records for several years, but not recent years, in our files. While the system is observed and inspected regularly, no formal record was kept. We will keep such records from this point forward. We note; however, that this requirement does not appear in the Rules, but rather in the operations plan for the IRL filed in 1993. Our failure to keep these records was



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due to our reference to the rules, rather than our operations plan.

- D. IRL2 groundwater monitoring well is indeed damaged and will require replacement. We were aware of this, but had elected to replace it after completion of the IRL closure. This is because the current location of the well is in a precarious position near the landfill cell and likely to be damaged by heavy equipment during closure. As a result of a telephone conversation with Larry Rose of the Solid Waste Section on October 19, 2000, we will take the following actions:
- Because the next sampling event is scheduled for this month, it will not be possible to take corrective actions before this event.
 - Due to the precarious location of this well, Mr. Rose has agreed that it will be best to move the location of the well when it is replaced. Our consulting engineer will submit a plan to Mr. Rose for the new location.
- E. We have located all of the ground water monitoring reports that were missing from the operating record. They were in archived files located in another building.
- F. We have not been able to locate the methane monitoring records for the period listed. We believe that, in the transition in Operations Managers, this sampling was omitted. Methane monitoring records have been kept properly since 1999.
- G. We disagree with the CLAT finding in this area. Because this matter was not discussed in the exit interview, we wish to make our case in this letter.

On September 24, 1999, CRSWMA filed an amended site application to the section. One of the purposes of this amended site application was to remove the subject area (which we refer to as Borrow Area #3) from the permitted facility boundary, allowing expanded use as a borrow site for closure of the IRL. Because no action had been taken on our permit application and our need to prepare bid documents for IRL closure was immediate, a site visit was made by representatives of the Section in February 2000 concerning Borrow Area #3. Subsequently, we received letter approval from Jim Coffey for borrow activities in this area, along with a request for a groundwater monitoring plan and other information. A draft of the groundwater plan was submitted by Draper Aden on May 10, 2000 and there has been follow-up correspondence since that time. One of the items pending has been pumping data, which had to be obtained from our site preparation contractor and was submitted October 18, 2000. No actual borrow activities have commenced in this area, only perimeter ditching and pump installation has taken place.

Because the Section has failed to respond to our revised site permit application in the 13 months since submittal, and because we have received written approval for the borrow activities and have been in continued communication with the Section

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throughout our activities in this regard, we do not believe this constitutes a violation. We respectfully request that the Section reconsider its position on this matter.

We appreciate the positive comments and the constructive suggestions made during the course of the Audit. We regret that some violations were found, but believe that our high turnover of supervisory personnel in the past (four Executive Directors and five Operations Managers in six years of operation) has caused some continuity problems in record-keeping. We are reviewing our records to put them in a more orderly fashion.

We look forward to your consideration regarding the activities in Borrow Site #3.

Sincerely,

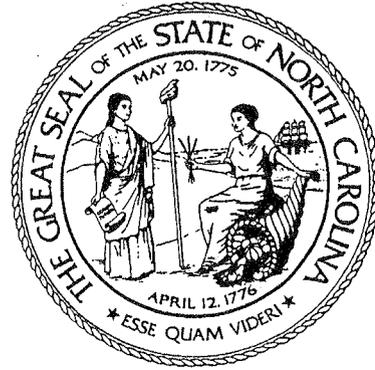
A handwritten signature in black ink, appearing to read "Allen M. Hardison". The signature is fluid and cursive, with the first name "Allen" being particularly prominent.

Allen M. Hardison
Executive Director

Cc: Mark Frye, Eastern Area Supervisor
Phil Prete, Field Operations Branch
CRSWMA Board Members

State of North Carolina
Department of Environment
and Natural Resources
Washington Regional Office

James B. Hunt, Jr., Governor
Bill Holman, Secretary



13 October 2000

OCT 17 2000

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7000 0600 0028 5482 1292

Mr. Allen Hardison
Coastal Regional Solid Waste Management Authority
7400 Old Highway 70 West
Post Office Box 128
Cove City, North Carolina 28523

RE: Comprehensive Landfill Audit Report of Coastal Regional
Solid Waste Management Authority Municipal Solid Waste Landfill
Permit No. 25-04
Craven County Facility

Dear Mr. Hardison:

The comprehensive landfill audit team (composed of engineers, waste management specialists and environmental specialists) conducted an inspection of your MSW landfill facility on 27 September 2000. Our findings were discussed with the landfill staff present at the conclusion of the audit. Enclosed is a copy of the comprehensive landfill audit report.

The Solid Waste Section appreciates your cooperation and that of your staff during the landfill audit. Please let me know if you have any questions concerning this report.

Sincerely,

Bobby Nelms
Waste Management Specialist

BN:ka
Enclosure

cc: Mark Fry, Eastern Area Supervisor
Phil Prete, Head, Field Operations Branch

COMPREHENSIVE LANDFILL AUDIT REPORT

- (1) **Facility Information:** Coastal Regional Solid Waste Management Authority
Municipal Solid Waste Landfill
7400 Old Highway 70 West
Post Office Box 128
Cove City, North Carolina 28523
- (2) **Facility Contact:** Allen Hardison
- (3) **Audit Participants:** Solid Waste Section Staff Participating in the audit were:
Rick Doby, Mark Fry, Bobby Nelms, Brent Rocket, Larry Rose
and Bill Sessoms.
CRSWMA Staff assisting with the audit were: Allen Hardison,
C.T. Clayton, David Warmack and Miriam Sumner.
- (4) **Date of Inspection:** 27 September 2000
- (5) **Purpose of Inspection:** To perform comprehensive audit of the municipal solid waste
landfill and associated units.

(6) **Violations Noted:**

- (A) 15A North Carolina Administrative Code 13B .1626(8)(d) states that leachate shall be contained on site or properly treated prior to discharge. The CRSWMA landfill was operating in violation of this rule in that:
- (1) Leachate was seen running over the rain cover in the active cell thereby permitting it to be released with stormwater.
 - (2) Several leachate seeps were observed flowing from the IRL. In many of these cases the leachate flowed past the edge of the liner allowing it to leave the site via stormwater drainage.

Immediate measures must be taken to correct these violations.

- (B) 15A North Carolina Administrative Code 13B.1626(1)(f) states that owners or operators of MSWLF units must implement a program for detecting and preventing the disposal of hazardous and liquid waste. In addition to other requirements this program must include training of facility personnel to recognize hazardous and liquid wastes. The CRSWMA landfill was operating in violation of 15A NCAC 13B. 1626 (10)(a)(i) in that no records of training procedures for facility personnel had been maintained.

Immediately implement and maintain a documented training program for facility personnel which meets the requirements of 15A NCAC 13B .1626(1)(f)(iii).

- (C) 15A North Carolina Administrative Code 13B .1626(12)(a) states that the owner or operator of a MSWLF unit designed with a leachate collection system must establish and maintain a leachate management plan which includes periodic maintenance of the leachate collection system. The CRSWMA landfill was in violation of this rule in that no record of inspection of the IRL leachate lines had

been maintained as was stated in the approved operations plan.

Begin maintaining records which show that periodic maintenance of the leachate collection system is being performed.

- (D) 15A North Carolina Administrative Code 13B .1633(b) states that the monitoring frequency for all Appendix I detection monitoring constituents shall be at least semiannual during the life of the facility (including closure) and the post closure period. The CRSWMA landfill was in violation of this rule in that the groundwater monitoring well known as IRL 2 shallow has been damaged for about one year thereby preventing data from being collected during that period.

Relocate

Immediately repair well IRL 2 shallow and resume sampling during the next sampling event.

- (E) 15A North Carolina Administrative Code 13B .1626(10)(a)(v) states that the owner or operator of a MSWLF unit must record and retain at the facility an operating record containing any monitoring, testing or analytical data as required by Rule .1627 of the Solid Waste Management Rules. The CRSMA landfill was in violation of this rule in that groundwater monitoring reports were not in the operating record or were not available during the audit for October 1996, April 1996, October 1995 and October 1994.

Check for missing data and if found, include it with the operating record. If data cannot be located, maintain the record to comply with this rule in the future.

- (F) 15A North Carolina Administrative Code 13B .1626(4)(b)(ii) states that the owner or operator of a MSWLF unit must implement a quarterly methane monitoring program. The CRSWMA landfill was in violation of this rule in that methane monitoring data was missing for one quarter in 1995, two quarters in 1996, two quarters in 1997, four quarters in 1998, and one quarter in 1999.

Immediately begin maintaining all methane monitoring data for every sampling event in the facility's operating record and ensure that methane monitoring is performed quarterly.

- (G) Clearing activities have been undertaken in the area south of the IRL between the IRL and the compost facility. The current operations in this area are not in accordance with the current permit. This area is currently within the permitted facility boundary. An application was submitted for the Section's review to allow borrow activities for this area. Additional information was requested as part of this review (reference: letter from Cheryl Marks to CRSWMA dated September 7, 2000). This information has not been submitted to the Section. The Section is awaiting this information in order to complete the review of this request. Utilizing this area for borrow activities is not currently approved for this facility.

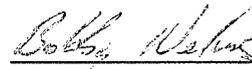
CRSWMA has undertaken preparatory activities to utilize this potential borrow area which include installing drainage ditches and pumping that has not received approval from the Section. These drainage and pumping activities may have an impact of the effectiveness of the IRL monitoring wells in the vicinity of this area.

CRSWMA should immediately submit the information requested for the Section to complete its review.

(7) Comments/Suggestions

- (A) The alternate daily cover should be overlapped and brought to the toe of the working face so that all waste is covered.
- (B) Several areas of erosion need to be addressed around the site.
Address erosion on side slopes and ditch/swale between the main access road and the IRL. Side slopes need to be repaired and seeded.
- (C) Scrap tire forms should be completely filled out.
- (D) Lock all groundwater monitoring wells at all times.
- (E) Remove all excess soil around monitoring wells IRLS 3s and 3d and protect wells.
- (F) Replace monitoring well IRL 2s.
- (G) Drill weep holes in outer protective casing of methane monitoring probes to drain water collected between casings.
- (H) Sample leachate for Solid Waste Section purposes at the leachate pump manhole rather than at the lagoons.

Please let me know if you have any questions concerning this inspection.



Bobby Nelms
Waste Management Specialist