



FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

UNIT TYPE: (check all that apply to this audit with same Permit number)											
Lined MSWLF	<input checked="" type="checkbox"/>	LCID	<input type="checkbox"/>	YW	<input type="checkbox"/>	Transfer	<input type="checkbox"/>	Compost	<input type="checkbox"/>	SLAS	COUNTY: Davidson PERMIT NO.: 29-06 FILE TYPE: COMPLIANCE
Closed MSWLF	<input type="checkbox"/>	HHW	<input checked="" type="checkbox"/>	White goods	<input checked="" type="checkbox"/>	Incin	<input type="checkbox"/>	T&P	<input type="checkbox"/>	FIRM	
CDFL	<input checked="" type="checkbox"/>	Tire T&P / Collection	<input checked="" type="checkbox"/>	Tire Monofil	<input type="checkbox"/>	Industrial Landfill	<input type="checkbox"/>	DEMO	<input type="checkbox"/>	SDTF	

Date of Audit: 09/17/08.Date of Last Audit: 03/26/08**FACILITY NAME AND ADDRESS:**

Davidson County Integrated Solid Waste Facility
 220 Davidson County Landfill Road
 Lexington, N.C. 27292

GPS COORDINATES: (Decimal Degrees) N: 35.85281 E: 80.17620**FACILITY CONTACT NAME AND PHONE NUMBER:**

Charles Brushwood, Solid Waste Director
 Office- 336-242-2284
 Cell- 336-240-0303
 e-mail- charlie.brushwood@davidsoncountync.gov

FACILITY CONTACT ADDRESS (IF DIFFERENT):

Davidson County Integrated Solid Waste Management
 1242 Old U.S Highway 29
 Thomasville, North Carolina 27360

AUDIT PARTICIPANTS:**Davidson County**

Charles Brushwood, Solid Waste Director
 Angela Jones, Administrative Assistant
 Elly Barton, HHW Facility
 Mike Lankford, HHW Facility
 Steven Sink, Landfill Supervisor
 Daniel Freeman, C&D Landfill Operator
 Linda Rimer, Scale House, Tire Program
 Judy Morelock, Administrative Assistant
 Steve Swaim, County Recycling Coordinator
 Allen Hutton, MRF Supervisor

N.C. Solid Waste Section

Deborah Aja
 Andrea Keller
 Ervin Lane
 John Murray
 Mary Whaley
 Jason Watkins
 Hugh Jernigan
 John Patrone

STATUS OF PERMIT:

Original Permit to Construct issued September 28, 1994 (Phase 1, MSW Unit)
 Original Permit to Operate issued January 17, 1995 (MSW Unit, Phase 1, Area 3).
 Permit Renewal issued August 21, 1995
 Permit to Operate issued March 13, 1996 (MSW Unit, Phase 1, Area 1)
 Permit to Operate issued May 30, 2000 (MSW Unit, Phase 1, Area 2, Cell 1).
 Permit to Operate issued June 22, 2001 (HHW Facility).

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Permit to Operate issued November 20, 2001 (C&D Landfill Unit, Phase 1).
Permit Modification issued May 15, 2002 (Mobile Home Deconstruction for C&D Landfill and Alternative Daily Cover for MSW Landfill).
Permit to Operate issued June 24, 2003 (MSW Unit, Phase 1, Area 2, Cell 2).
Permit to Operate issued March 17, 2006 (C&D Landfill Unit, Phase 2)
Permit to Construct issued September 28, 2007 (Phase 2 Area 1)
Permit Review Date May 30, 2010.

PURPOSE OF AUDIT:

Comprehensive Audit

NOTICE OF VIOLATION(S) (citation and explanation):

1. 15A North Carolina Administrative Code 13B .1626 (2) (a) "... the owners or operators of all MSWLF units must cover disposed waste with six inches of earthen material at the end of each operating day, or at more frequent intervals if necessary, to control disease vectors, fires, odors, blowing litter and scavenging."

Insufficient daily cover and exposed waste was observed in Areas 1 and 2 (see items 32-37 in Areas of Concern and Comments section, below).

2. 15A North Carolina Administrative Code 13B .1626 (2) (c) "Areas which will not have additional waste 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."

Insufficient intermediate cover was observed in Areas 1 and 2 (see items 32-37 in Areas of Concern and Comments section, below).

These violations as noted in the Areas of Concern and Comments section, items 32-37, should be corrected immediately. An inspection will be conducted by the Solid Waste Section no later than October 17, 2008 to evaluate corrective actions.

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. If the violation(s) noted here continue, 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.

STATUS OF PAST NOTED VIOLATIONS (List all noted last audit):

NONE

AREAS OF CONCERN AND COMMENTS:

General Information

1. The facility consists of a MSW landfill, C&D landfill, HHW collection facility, tire collection site, white goods collection and processing facility, a metals collection site, a waste drop-off convenience area for cars and small trucks, a swap shop area, household textiles recycling area, electronics recycling, a drop-off convenience area for selected recyclables, and a material recovery facility for collected recyclables.
2. The service area for the facility is Davidson County.
3. Operational records for the facility are maintained at the Davidson County Integrated Solid Waste office located at 1242 Old U.S Highway 29.

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4. Permitting status review: The CQA report for the Phase 2, Area 1 MSW construction has been received and reviewed, except for the construction of the leachate tank. At current disposal rates, the Phase 1 MSW Landfill has approximately 8 months of disposal capacity and the C&D Landfill has approximately 3.2 years of disposal capacity. The permit modification for the approval of partial closure of Phase 1, Area 3/Area 1 and the post-closure approval for the Hamby Creek Horse Trail has been written but not signed. A decision was made by the Solid Waste Permitting Section to separate the horse trail from Permit No. 29-06 and including it as a closure condition for Permit 29-02. Permission was granted to Davidson County by the Solid Waste Permitting Section to proceed with the closure modification and the horse trail.
5. Groundwater monitoring program review: The approved groundwater monitoring plans for the Davidson County MSW Landfill and C&D Landfill were reviewed. The two previous semiannual groundwater/surface water/leachate monitoring events for the MSW Landfill and C&D Landfill were reviewed and contained the required information. Monitoring wells were properly labeled and secured.
6. Methane monitoring program review: The facility maintains up to date records of required methane monitoring and no LEL exceedances have been recorded in the landfill gas monitoring wells or in facility structures
7. Reviewed current permit, operational plans, tonnage reports and other operational records for the facility.
8. Reviewed random screening program. Random screenings are conducted separately at the MSW Landfill and C&D Landfill. Reviewed random screening reports of 9/2/08, 9/3/08, 9/4/08, 9/8/08, 9/10/08, 9/12/08, and 9/16/08 for the MSW Landfill. Reviewed random screening reports for the C&D landfill which are conducted at the minimum rate of one per week. The frequency of random screenings is in compliance with the approved operations plan.
9. Financial assurance documentation for the MSW Landfill and C&D Landfill was approved January 12, 2008.
10. The facility is covered under N.C. General Storm Water Permit No. NCG120038 issued in 2007 and expiring in 2012. No inspections have been conducted by the Surface Water Protection Section within the past year.
11. The facility is covered under approved Erosion and Sedimentation Control plan. The last plan approval was in April 2007 for the Phase 2 MSW Landfill construction. No inspections have been conducted in the last few years by the Land Resources Division.
12. The facility has a pump and haul permit to the City of Lexington Waste Water Treatment Plant for leachate generated by the MSW Landfill operations. During the month of August 8 tanker loads of leachate were hauled to the waste water treatment plant. The leachate pond was last inspected by landfill staff on 7/30/08. The leachate lines were camera inspected in 2006.
13. The material recovery facility processes items collected from the Davidson County recycling program and collected recyclables from the cities of Lexington and Thomasville. The Material Recovery Facility picking line was in operation during the inspection. For the past fiscal year (July 1, 2007- June 30, 2008 the facility collected and processed the following amounts: Plastics (PETE#1- 165 tons and HDPE#2- 74 tons), Glass (Brown-92 tons and Clear- 92 tons, Electronics- 66 tons, Newspaper (ONP) – 880 tons, Mixed paper (MPW) – 565 tons, Cardboard (OCC) – 618 tons, Office paper (OFP) – 36 tons, Aluminum cans-20 tons, Steel cans- 44 tons, Textiles – 67 tons.
14. In conjunction with the Davidson County recycling programs for the fiscal year July 1, 2007- June 30, 2008, the county collected: 28,185 gallons of used oil, 400 gallons of used antifreeze, 1,219 lead acid batteries, .20 tons of rechargeable batteries, and 4.8 tons of vinyl siding.
15. Review of training records include, but not limited to the following SWANA certifications for all facility areas of operation: Charles Brushwood, Certified Landfill Manager-expires 04/15/09; Steven Sink, Certified Landfill Manager-expires 11/30/10; Karry Blaylock, Certified Landfill Manager-expires 04/28/09; Angela Jones, Landfill Operations Specialist-expires 03/27/10; Daniel Freeman, Landfill Operations Specialist-expires 02/07/10; Keith Cecil, Landfill Operations Specialist-expires 05/16/09; Daniel James, Landfill Operations Specialist-expires 02/07/10; Michael Lankford, Landfill Operations Specialist-expires 02/07/10; Judy Morelock, Landfill Operations Specialist-expires 02/07/10; Jamie Jarrell, Landfill Operations Specialist-expires 05/01/10; Linda Riner, Landfill Operations Specialist-expires 02/07/10; Mark Pierce, Landfill Operations Specialist-expires 05/16/09; and Brant Peoples, Landfill Operations Specialist-expires 02/25/11.

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16. The MSW landfill is currently not conducting leachate recirculation, but is approved for leachate recirculation in the permit to operate.
17. The MSW landfill permit to operate contains a condition to allow for disposal of Waste Water Treatment Plant sludges.
18. Reviewed the Operations Plans for the MSW and C&D landfills.
19. Reviewed the proposed revised Operations Manual, submitted in conjunction with the permit to construct, Phase 2 MSW application, dated February 2007.
20. Conducted a review of the County tire collection program. The facility maintains a log of registered tire haulers and generators delivering tires to the site. Tonnage totals for received tires are listed under commercial for the registered haulers/generators and separately for less than 5 tires brought in by county residents and county clean-ups. Reviewed recently processed tire certification forms and found to be accurate and properly signed. The facility received 134.58 tons of tires during the month of August 2008. The facility collected 2,445.41 tons of tires for the fiscal year July 1, 2007- June 30, 2008. The scrap tire area was found to be well managed and operated.
21. Observed operations at metals collection site, convenience areas, tire collection site, household textiles recycling area, electronics recycling, white goods collection and processing facility, swap shop area
22. Observed operations at the material recovery facility. The picking line was in operation during the audit.

MSW Landfill Unit

23. Observed operations at the MSW landfill. Currently operating in Phase 1, in the general location between Area 1 and Area 2.
24. The MSW Landfill is currently receiving approximately 350-400 tons per day; the MSW Landfill received 9,844.15 tons for the month of July 2008.
25. Required signage observed at the entrance of the facility.
26. The MSW Landfill is approved for the use of tarps as an alternative daily cover. According to landfill staff, two 100 ft. x 100 ft. are utilized daily in addition to soil cover.
27. The leachate collection system lagoon at the north side of the landfill was observed to have minimal amount of collected leachate and currently has large residual capacity.
28. Windblown materials observed to be effectively controlled and collected.
29. Banned waste was not observed at the working face, tires had been placed to the edge of waste for pick up, and no unacceptable waste streams were noted.
30. Tires utilized to secure litter fences were noted to be partially buried due to erosion. These tires should be located, removed, and properly disposed.
31. Observed a random inspection/waste screening being conducted by landfill staff. The operator performed the waste screening while seated in the dozer prior to spreading and pushing the pile to the working face. The waste being screened was commingled with other waste during the process. It is recommended procedures for waste screening be reviewed by landfill staff to assure the waste is thoroughly screened and identified prior to combining with other waste in the area.
32. **Additional soil cover is required on all areas of the landfill that that have exposed waste or eroded (see specifics below).**
33. **Side slope erosion and exposed waste was noted in Areas 1 and 2. The edge of liner demarcation was difficult to locate due to erosion and silt and the storm water ditch system at the base of the side slopes in active Areas 1 and 2 were heavily silted. Storm water diversion techniques and provisions for vegetative cover should be implemented to control excessive on-site erosion.**
34. Working face was noted to be larger than recommended, and effective compaction was not occurring at the edge of the working face (opposite of the tipping deck area) due to the configuration of the working face. **Areas of exposed waste near the working face requires additional soil cover.** The large size of the working face may cause difficulties in meeting daily cover requirements.

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35. The last approximately 400 feet of the access road inside the landfill to the working face was difficult to navigate by incoming waste vehicles due to mud resulting from recent rain events. Some waste vehicles were requiring assistance from landfill personnel to ingress and egress the site. Observed incoming waste vehicles dumping waste loads 200-300 feet from the working face, and the waste had to be pushed by landfill equipment to the working face. This activity was disturbing soil cover and exposing waste. **Additional soil cover and/or other roadway stabilizing materials should be immediately placed in the area of the working face tipping deck and incoming roadway to the working face to affect all weather road ways and cover exposed waste.**
36. **Unused access roads inside the landfill require additional soil cover due to erosion and exposed waste.**
37. **The currently unused access road on the north side of the landfill in the general area of the junction of Area 3 and Area 1 (near the leachate lagoon) was noted to have excessive erosion with no soil cover in place. There was evidence of storm water coming in contact with waste and potentially flowing down the access road and past the edge of the liner system. This area should be repaired immediately.**
38. According to landfill staff, seeding for vegetative cover is being scheduled within the next two weeks. It is recommended that Davidson County landfill staff re-evaluate the seeding schedule and provisions for vegetative cover for the future. A established vegetative cover is an effective tool in stabilizing sides slopes and soil cover in areas of the landfill not undergoing disposal activities for significant periods of time.
39. The MSW Phase 1, Area 3 and parts of Area 1 have undergone closure. Passive methane vents have been installed in the closed areas.
40. The close Area 3 was found to have good vegetative cover. Recommend mowing activities be conducted in areas with established vegetative cover.
41. The north side slope in Area 3, approximately 15 feet up from the marked edge of liner exhibited seepage. These areas should be repaired immediately to prevent the possibility of a leachate break-out.
42. Photos were taken during the facility audit.

C&D Landfill

43. Observed operations at the C&D landfill.
44. The C&D landfill facility began receiving waste on December 4, 2001.
45. Deconstruction of mobile homes is approved by 05/15/02 Permit modification at the C&D landfill. No mobile home deconstructions have been conducted in recent months.
46. The working face was approximately ¼ acre in size and waste was evaluated to be well compacted.
47. The C&D landfill receives approximately 50-100 tons of waste per day and received 1,394.42 tons for the month of July 2008.
48. The C&D landfill conducts recycling activities on site consisting of metals, clean wood, cardboard and other recyclables which are placed in proper containers at the end of each day. During the month of July 2008, 333.69 tons of wood, concrete, and cardboard was recycled from incoming waste, resulting in an actual total of 1,060.73 tons for waste disposal in the landfill disposal for the period.
49. Observed incoming loads, all incoming waste generated from construction and demolition operations during inspection period. No prohibited waste was noted in the C&D landfill.
50. Edge of waste was clearly marked with survey stakes and orange ribbon.
51. Observed an area of exposed waste on the north side slope of the landfill. The current working face was located at the south side of the landfill near the access roads. The landfill operator stated the north side slope area was the working face during the past week, until recent rains when it was moved to the new location. **The north side slope area should have six inches of soil cover placed immediately. Solid Waste rules state soil cover must be applied once weekly or when the waste disposal area reaches one-half acre in size.**
52. Minor areas of erosion and exposed waste were noted on side slopes due to recent rains. **These areas should be immediately recovered with soil.**

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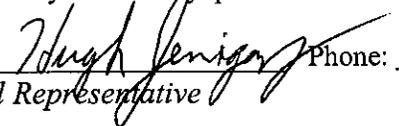
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- 53. The C&D landfill unit has a leachate sump system located in the northwest corner of the landfill. The system has not been accumulating leachate and has not required pumping in the past year. Reviewed leachate logs for the C&D landfill unit.
- 54. As per .0531 (c) (2), the Davidson County C&D Landfill has submitted an application to the Solid Waste Section to meet the requirements of .0547 (2) (a) (closure and post closure plan) and (b) (financial responsibility).

Household Hazardous Waste Facility

- 55. Reviewed HHW facility operations and procedures. The HHW facility is closed to citizens on Wednesdays (day of the facility audit) for inventory and processing collected materials.
- 56. Delivery and processing operations are in covered areas. An emergency drain and sump is located in the delivery area for potential spills.
- 57. Review of training records indicate Mike Lankford and Elly Barton have course completion certifications including Hazardous Waste Management issued by Environmental Resource Center, August 2005, Advanced Hazardous Waste Compliance for Generators issued by the Division of Waste Management, 2001, and HAZWOPER certifications with the two past yearly HAZWOPER annual updates.
- 58. Reviewed HHW facility operations plan, contingency plans, spill prevention plans, and brochures given to the public.
- 59. Reviewed HHW facility operational records including daily receiving logs, weekly staff inspection logs, weekly inventory logs, and shipping manifests.
- 60. Collected HHW at the site is packaged on site and transported by 3RC.
- 61. Review of facility logs indicated the facility collected 74,740 pounds of HHW during the period July 1, 2007-June 30, 2008. The facility typically averages 5,000-10,000 pounds per month of HHW delivered by county citizens.
- 62. The facility was observed to be clean and well maintained, with minimal inventory on site. The facility receives paints, poisons, flammable solvents, flammable solids, antifreeze, used oils, oxidizers, compressed gas, acids, batteries, and other miscellaneous HHW waste.
- 63. Non-hazardous latex paints are solidified on site for disposal in the MSW landfill.
- 64. The facility does not accept explosives, infectious waste, or radioactive waste.

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

Hugh Jernigan  Phone: 336-771-5093
Regional Representative

Distribution: original signed copy to facility -- signed copy to compliance officer – e-mail or copy to super

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