



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	<input type="checkbox"/>	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"/>	Incineration	<input type="checkbox"/>	T&P	<input type="checkbox"/>	FIRM	<input type="checkbox"/>	
CDLF	<input checked="" type="checkbox"/>	Tire T&P / Collection	<input checked="" type="checkbox"/>	Tire Monofill	<input type="checkbox"/>	Industrial Landfill	<input type="checkbox"/>	DEMO	<input type="checkbox"/>	SDTF	<input type="checkbox"/>	

Date of Audit: 05/28-29/09.Date of Last Audit: 10/17/08**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
 Steve Swaim, County Recycling Coordinator
 Hugh Jernigan, N.C. Solid Waste Section

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).
 Permit to Operate issued November 20, 2001 (C&D Landfill Unit, Phase 1).

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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 April 10, 2006 (C&D Landfill Unit, Phase 2).
Permit to Construct issued September 28, 2007 (Phase 2 Area 1).
Permit to Operate issued December 8, 2008 (Phase 2 Area 1), (Partial Closure Phase 1, Areas 1&3) (Closure Modification and Regrading Plan, Phase 1).
Permit Expiration Date July 27, 2011.

PURPOSE OF AUDIT:
Comprehensive Audit

NOTICE OF VIOLATION(S):

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."

No placement of soil cover or alternative daily cover waste was observed from disposal operations on May 28, 2009.

Immediately cover all waste in the Phase 2 MSW Landfill and submit an explanation to the Solid Waste Section on the cause of this violation. A plan of action to prevent future violations of .1626 (2) (a), including a daily cover log, should be submitted to the Solid Waste Section within one week of receipt of this notice. It is suggested the daily cover log include verification by a supervisor.

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.

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 (Phase 1 and Phase 2), Construction and Demolition Landfill, House Hold Hazardous Waste 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. Reviewed current permit, operational plans, tonnage reports and other operational records for the facility and facility components.
5. The most recent financial assurance documentation for the facility was submitted to the Solid Waste Section on January 23, 2009.
6. The facility is covered under N.C. General Storm Water Permit No. NCG120038 issued in 2007 and expiring in 2012.
7. 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. 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.
8. Reviewed facility training records including SWANA certifications, waste screening training, and other related solid waste training.
9. Current SWANA certifications for all facility areas of operation include, but not limited to: Steven Sink, Certified Landfill Manager-expires 11/30/10; Angela Jones, Landfill Operations Specialist-expires 03/27/13; Daniel Freeman, Landfill Operations Specialist-expires 02/07/10; Daniel James, Landfill Operations Specialist-expires 02/07/10; Michael Lankford, 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; and Brant Peoples, Landfill Operations Specialist-expires 02/25/11.
10. Note: There is an adequate number of facility staff currently holding training certifications to meet the requirements of G.S 130A-309.25 "Training of Operators at Solid Waste Facilities". For informational purposes only, review of training records indicated the following certifications have recently expired: Charles Brushwood, Certified Landfill Manager-expired 04/15/09; Karry Blaylock, Certified Landfill Manager-expired 04/28/09; Keith Cecil, Landfill Operations Specialist-expired 05/16/09; and Mark Pierce, Landfill Operations Specialist-expired 05/16/09.
11. The facility has submitted financial assurance documentation for the current year.
12. The MSW landfill permit to operate contains a condition to allow for disposal of Waste Water Treatment Plant sludges.
13. Reviewed the Operations Plans for the MSW and C&D landfills.

Phase 1 and 2 MSW Landfill Units

14. Disposal operations began December 10, 2008 for the Phase 2, Cell 1 area.
15. General MSW disposal for the Phase 1 area was discontinued on December 16, 2008, but the Phase 1 area remains open for disposal. There is still available airspace remaining in the Phase 1 area. Cap construction and final closure are not scheduled at this time.
16. The MSW Phase 1, Area 3 and parts of Area 1 have undergone closure and approval by the Solid Waste Section.
17. The closed Phase 1, Area 3 and Area 1 were found to have good vegetative cover.
18. Good intermediate soil cover in the most recently utilized disposal areas in Phase 1.
19. Reviewed the methane monitoring program and quarterly monitoring results for the December 10, 2008 and March 11, 2009. Methane probes were documented as installed on the Phase 2 area August 2008. Note: The methane monitoring for Phase 2 should be conducted at the same time as the Phase 1 area and facility buildings.
20. A landfill gas extraction system and operating flare have been installed on the closed area for volume and flow testing in preparation for a complete landfill gas system in the entire Phase 1 area.
21. Soil cover and fine grading have been completed in preparation for seeding in the Phase 1, Area 2 and parts of Area 1 (seeding to be conducted within a week).

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22. Reviewed semiannual monitoring program and last semiannual monitoring report from October 7, 2008. The first semiannual monitoring event for 2009 has been conducted but the analysis report has not been completed.
23. Reviewed asbestos disposal program. The last disposal of regulated asbestos occurred April 30, 2009 (51 bags, 1.71 tons). The disposal location for asbestos in the MSW landfill is logged and maintained.
24. Reviewed leachate program and records.
25. The Phase 1 leachate collection lagoon was observed to have adequate residual capacity available. The collected leachate is hauled to the City of Lexington Waste Water Treatment Plant.
26. Phase 2 leachate is collected and stored in a 330,000 gallon storage tank (550,000 secondary containment area) and is hauled to the City of Lexington Waste Water Treatment Plant. At the time of the facility audit the leachate storage tank was filled to approximately one-third capacity (24 ft.)
27. Reviewed random inspection program and reviewed waste screening reports. There have been 25 random inspections during the past two months at the MSW landfill. The number random inspections exceed 1% of incoming loads (Refer to approved Operations Plan for random inspection frequency).
28. Edge of waste markers are in place on the Phase 2 area (contract specification for construction).
29. Observed operations at the Phase 2 MSW landfill.
30. Currently operating in Cell 1.
31. Adequate intermediate soil cover over previous disposal operations.
32. The MSW Landfill is currently receiving approximately 300-350 tons per day; the MSW Landfill received 34,516.34 tons for the period January- April 2009.
33. Adequate compaction of incoming waste from daily operations.
34. Adequate intermediate soil cover over previous waste disposal areas
35. Windblown materials observed to be effectively controlled and collected. The facility has constructed portable fences to be utilized as needed.
36. Monitoring wells accessible and locked.
37. The MSW Landfill is approved for the use of tarps as an alternative daily cover.
38. **Observations revealed that no daily soil cover or alternative cover was placed over waste at the end of the day on May 28, 2009. All exposed waste should be immediately covered.**
39. Photos were taken at the MSW landfill after end-of-day activities on May 28, 2009.

C&D Landfill

40. Observed operations at the C&D landfill.
41. The C&D landfill facility began receiving waste on December 4, 2001.
42. 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.
43. The working face was well controlled (approximately ¼ acre in size) and waste was well compacted.
44. Weekly soil cover and intermediate cover adequate. It is suggested a "Weekly Soil Cover Log" be maintained for verification of weekly soil cover requirements.
45. The C&D landfill receives approximately 800 tons of waste per month and has received 2,953.35 tons for the period of January-April 2009.
46. 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.
47. 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.

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48. Reviewed random inspection program and reviewed waste screening reports. There have been 12 random inspections during the past two months, exceeding the minimum requirements for the C&D landfill.
49. Edge of waste markers are in place.
50. Reviewed semiannual monitoring program and last semiannual monitoring report from October 7, 2008. The first semiannual monitoring event for 2009 has been conducted but the analysis report has not been completed.
51. Monitoring wells were observed to be secure, accessible, and locked.
52. Windblown materials well controlled and collected.
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. The facility was initially permitted to operate June 22, 2001.
56. Reviewed HHW facility operations and procedures. The HHW facility is open to Davidson County citizens on Thursdays, the first Saturday of each month, and by appointment.
57. Delivery and processing operations are in covered areas. An emergency drain and sump is located in the delivery area for potential spills.
58. 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.
59. Reviewed HHW facility operations plan, contingency plans, spill prevention plans, and brochures given to the public.
60. Reviewed HHW facility operational records including daily receiving logs, weekly staff inspection logs, weekly inventory logs, and shipping manifests.
61. Collected HHW at the site is packaged on site and transported by Resource Recovery and Reduction (3RC). The last invoice for pick up by 3RC was February 11, 2009.
62. Review of facility logs indicated the facility collected 74,740 pounds of HHW during the reporting period July 1, 2007-June 30, 2008. The facility collected 3,529 pounds during February 2009, 2,053 pounds during March 2009, and 3,879 pounds during April 2009.
63. Excellent documentation and records maintenance.
64. 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.
65. Collected used automotive oils are utilized in waste oil burners at the Davidson County Landfill .
66. Non-hazardous latex paints are solidified on site for disposal in the MSW landfill.
67. The facility does not accept explosives, infectious waste, or radioactive waste.

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Other Facility Components

68. Observed operations at metals collection site, convenience areas, tire collection site, household textiles recycling area, electronics recycling, white goods collection and processing facility, and swap shop area.
69. Observed operations at the material recovery facility. The picking line was in operation during the audit.
70. The material recovery facility processes items collected from the Davidson County recycling program and collected recyclables from the cities of Lexington and Thomasville. For the period January- April 2009 the facility collected and processed 1,040.12 tons (Plastics (PETE#1 and HDPE#2s)), Glass, Electronics, Newspaper (ONP), Mixed paper (MPW), Cardboard (OCC), Office paper (OFP), Aluminum cans, and Steel cans).
71. The Textile Recycling operation collected 11.13 tons of textiles for the period January-April 2009.
72. In conjunction with other Davidson County recycling programs for the reporting period 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.
73. Observed white goods and metals collection and processing areas. White goods brought in by county residents are processed at the site and have CFC's removed before shipment to recyclers. The facility processed 67.2 tons of white goods for the period January-April 2009.
74. 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. Incoming scrap tires are placed in trailers by scrap tire haulers, and is monitored by scale house personnel. Reviewed recently processed tire certification forms and found to be accurate and properly signed. The facility received 146.96 tons of tires during the month of April 2008 and 1,207.41 tons to date for 2009. The facility collected 2,445.41 tons of tires for the reporting period July 1, 2007- June 30, 2008.
75. Excellent documentation regarding registered tire haulers, generators, and tonnage reports. The scrap tire area was found to be well managed and operated.

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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cc: Mark Poindexter, Field Operations Branch Supervisor
 Jason Watkins, Central District Supervisor
 Donald Herndon, Compliance Officer
 Robert Hyatt, Davidson County Manager