



FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

UNIT TYPE:											
Lined MSWLF		LCID		YW		Transfer		Compost		SLAS	COUNTY: Forsyth PERMIT NO.: 34-19 FILE TYPE: COMPLIANCE
Closed MSWLF		HHW		White goods		Incineration		T&P	X	FIRM	
CDLF		Tire T&P / Collection		Tire Monofill		Industrial Landfill		DEMO		SDTF	

Date of Audit: January 27, 2009

Date of Last Audit: October 17, 2007

FACILITY NAME AND ADDRESS:

Lowder Recycling and Disposal, LLC Treatment and Processing Facility
 2810 Griffith Road
 Winston-Salem, NC 27103

GPS COORDINATES: N: 36.0367 E: -80.3136

FACILITY CONTACT NAME AND PHONE NUMBER:

Eugene Lowder- Owner
 w: 336-760-0477

FACILITY CONTACT ADDRESS:

2810 Griffith Road
 Winston-Salem, NC 27103

AUDIT PARTICIPANTS:

John Patrone, NCDENR – Solid Waste Section (SWS)
 Jason Watkins, NCDENR - SWS
 Billy Keiger, Maintenance Supervisor
 Michael Young, R&D Supervisor (responsible for temperature records, faxed data to SWS 1/29/09)

STATUS OF PERMIT:

Permit To Operate (PTO) issued June 30, 2004
 PTO expires July 1, 2009

PURPOSE OF AUDIT:

Comprehensive Audit

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 3

STATUS OF PAST NOTED VIOLATIONS:

Permit Condition No. 5 states that "Any heat generation in excess of 110 degrees Fahrenheit (composting) in any of the piles of material at the facility will be considered a permit violation."

This facility is in violation of permit condition No. 5 in that random temperature checks were performed during the inspection and temperatures were found above the 110 degree reading. At least 2 readings were taken in every other windrow, and in 4 instances temperatures were above 110 degrees with 2 readings at/above 120 degrees.

The facility must develop and implement a plan to ensure temperature readings stay below permitted limits. A copy of this plan of action should be submitted to the Winston-Salem Regional office.

A temperature monitoring/maintenance plan was submitted to the SWS on 8-14-07. Based on data that was received on 1-23-08, the facility was able to reduce temperature readings below the required 110 degrees and records showed that temperatures have been maintained below that level. Therefore, these (two) items have been resolved.

AREAS OF CONCERN AND COMMENTS:

On January 27, 2009, John Patrone and Jason Watkins met with Billy Keiger to conduct a comprehensive audit of the Lowder Recycling and Disposal, LLC Treatment and Processing facility in Winston-Salem, Forsyth County.

1. The facility is a permitted Treatment and Processing (T&P) facility. It accepts land clearing and inert debris (LCID) material. It produces mulch and screened topsoil.
2. Facility throughput for July 2007 through June 2008 was 2,121.7 tons.
3. The facility is required to maintain temperature records of the mulch piles ensuring that the temperature does not exceed 110° F.
4. Temperature records for 2008 were verified. The facility took temperature readings on: February 5th, May 14th, July 17th, September 14th, and December 2nd. Temperature readings are taken at three locations per windrow. All temperature readings were < 110° F.
5. The facility commonly maintains three windrows. During the inspection the windrows were well maintained and were ~ 10 feet in height. The facility is required to maintain its windrows by limiting their height and width and turning frequently. The facility has been informed that if windrow temperatures commonly exceed 110° F it would have to obtain a Type 1 Solid Waste Compost permit.
6. Un-permitted waste is collected and separated accordingly (scrap metal is stored on-site and sold in bulk).
7. Mr. Patrone observed that incidental C&D debris was mixed-in with unprocessed LCID material. The facility is reminded to remove construction and demolition (C&D) debris from LCID material when received, and ensure it is not ground.
8. A hauling record was verified for the disposal of C&D debris. On January 21, 2009 the facility hauled 3.64 tons of C&D debris to the Old Salisbury Landfill (34-12).
9. The facility appeared to meet the required 50 foot property line buffers.
10. There was no indication of soil erosion.
11. Proper signage was posted at the facility entrance.
12. The site is secured by a gate.

FACILITY COMPLIANCE AUDIT REPORT
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Page 3 of 3

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


John Patrone
Environmental Senior Specialist
Regional Representative

Phone: 336-771-5095 Fax: 336-771-4631

Delivered on : <u>February 4, 2009</u> by		Hand delivery	<input checked="" type="checkbox"/>	US Mail		Certified No. <input type="checkbox"/>
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cc: Mark Poindexter, Field Operations Branch Supervisor
Jason Watkins, Central Regional Supervisor
Donald Herndon, Compliance Officer
Michael Scott, Composting & Land Applications Branch Head