



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 T&P FILE TYPE: COMPLIANCE
Closed MSWLF		HHW		White goods		Incin		T&P	X	FIRM		
CDFL		Tire T&P / Collection		Tire Monofill		Industrial Landfill		DEMO		SDTF		

Date of Audit: January 25, 2011**Date of Last Audit:** January 27, 2010**FACILITY NAME AND ADDRESS:**

Lowder Recycling and Disposal LLC Treatment and Processing Facility
 2840 Griffith Road
 Winston-Salem, NC 27103

GPS COORDINATES: **N:** 36.0367 **E:** -80.3136**FACILITY CONTACT NAME AND PHONE NUMBER:**

Gene Lowder – Owner

w. 336-760-0477

f. 336-760-6640

glowder@lowderinc.com

FACILITY (OFFICE) CONTACT ADDRESS:

Lowder Recycling and Disposal LLC
 Gene Lowder, Owner
 2810 Griffith Road
 Winston-Salem, NC 27103

AUDIT PARTICIPANTS:

John Patrone, NCDENR – Solid Waste Section (SWS)
 Aubrie Welch, Forsyth County - Environmental Health Specialist
 Marlene Oakley, Administrative Assistant
 Michael Young, Yard Supervisor

STATUS OF PERMIT:

Permit To Operate (PTO) issued December 11, 2009
 PTO expires December 11, 2014

PURPOSE OF AUDIT:

Comprehensive Audit

NOTICE OF VIOLATION:

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.

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STATUS OF PAST NOTED VIOLATION(S):

None

AREAS OF CONCERN AND COMMENTS:

On January 25, 2011, John Patrone and Aubrie Welch met with Marlene Oakley and Michael Young to conduct a comprehensive audit of the Lowder Recycling and Disposal LLC Treatment and Processing facility on Griffith Road in Winston-Salem, Forsyth County.

1. The facility is a Treatment and Processing (T&P) Facility. It is permitted to accept land clearing debris, untreated and unpainted wood waste, wooden pallets, and high C:N ratio yard waste. The facility produces mulch, fill dirt, and screened topsoil that are sold to the general public.
2. Fill dirt is obtained from "leftovers" deposited from land clearing debris (LCD) and segregated stump piles.
3. Topsoil is obtained from screened "leftovers" deposited from mulch piles.
4. The facility site plan and operations plan were discussed.
5. The facility maintains records of the LCD received. Records were reviewed for 2010.
6. Land clearing debris is sold as mulch. The facility maintains records of mulch sales.
7. Facility throughput for July 2009 through June 2010 is 1,507.80 tons. Facility throughput for July 2010 through December 2010 is 606.90 tons.
8. The facility estimates that the average landscape truck contains ~ 0.5 tons of land clearing debris, a single axle dump truck contains ~ 4 tons, and a tandem axle dump truck contains ~ 8 tons.
9. The facility maintains temperature records of the mulch piles in order to ensure that the temperature does not exceed 110° F. The facility conducted temperature readings in February, March, April, May, June, August, September, October, and November 2010. Temperature readings were taken at three locations per windrow. All temperature readings were \leq 110° F.
10. During the inspection the facility had numerous piles of mulch. Mr. Young stated that the LCD was recently ground in order to have product for spring and summer.
11. Mulch windrows are limited to 10 foot high with a base of 20 foot wide.
12. The facility maintained fire lanes between windrows that appeared \geq 8 feet in width.
13. Unpermitted waste is segregated and placed in trash cans for pickup by a local solid waste hauler. Scrap metal is stored on site in a dumpster and picked up by recycler when full.
14. The facility appeared to meet the 50 foot buffer requirement. The 50 foot buffer requirement includes maintaining a buffer area around the creek that bisects the property.
15. The rear portion of the lot is used to store construction material (cement block, metal conduit, drainage pipe, etc.) related to Lowder Recycling and Disposal LLC.
16. Mr. Young stated that the pile of mixed soil and LCD at the left rear of the lot that had been placed within the 50 foot buffer area was removed/screened and LCD ground. Upon inspection the mixed soil and LCD pile appeared to have been removed.
17. Mr. Young stated that in February 2010 an estimated 30 foot section of the culvert was removed from the creek that bisects the lot separating the T&P operation from the construction material storage area. Upon inspection it appeared that a section of culvert has been removed.
18. There was no indication of soil erosion, runoff, or rutting. If subgrade rutting occurs the facility is required to back blade and level the area to ensure positive drainage.
19. Mr. Young stated that the retaining wall on the small stormwater collection pond on the left side of the lot (2nd from the front) was rebuilt ~ August 2010. Upon inspection the retaining wall appeared to have been reconstructed.
20. The facility has proper signage.
21. The facility is secured by a locked gate and facility personnel are on site during business hours.
22. The facility permit expires on December 11, 2014.

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



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

John Patrone
Environmental Senior Specialist
Regional Representative

Delivered on : <u>February 1, 2011</u> by		Hand delivery/e-mail	X	US Mail		Certified No. []
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cc: Mark Poindexter, Field Operations Branch Supervisor
Jason Watkins, Central Regional Supervisor
Donald Herndon, Compliance Officer
Michael Scott, Composting & Land Application Branch Head
Minor Barnette, Forsyth County, Environmental Health Supervisor