



# FACILITY COMPLIANCE AUDIT REPORT

## Division of Waste Management Solid Waste Section

**UNIT TYPE:**

Lined MSWLF		LCID		YW		Transfer		Compost		SLAS		<b>COUNTY: Forsyth</b> <b>PERMIT NO.: 34-20</b> <b>FILE TYPE: COMPLIANCE</b>
Closed MSWLF		HHW		White goods		Incin		T&P		FIRM		
CDFL		Tire T&P / Collection		Tire Monofill		Industrial Landfill	<input checked="" type="checkbox"/>	DEMO		SDTF		

**Date of Audit:** February 28, 2011**Date of Last Audit:** February 26, 2010**FACILITY NAME AND ADDRESS:**

OmniSource Southeast LLC - Kernersville Plant  
 1426 W. Mountain Street  
 Kernersville, NC 27284

**GPS COORDINATES:** N: 36.14131 E: 80.10312**FACILITY CONTACT NAME AND PHONE NUMBER:**

Bill Perry, Regional Manager  
 w. 336-996-2350  
 c. 336-655-1211  
 f. 336-996-0493  
 bperry@omnisourcese.com

**FACILITY CONTACT ADDRESS:**

OmniSource Southeast LLC – Kernersville Plant  
 Bill Perry, Regional Manager  
 PO Box 608  
 Kernersville, NC 27285-0608

**AUDIT PARTICIPANTS:**

John Patrone, NCDENR – Solid Waste Section (SWS)  
 Bill Perry, OmniSource Southeast LLC - Regional Manager  
 James Winegar, OmniSource Southeast LLC - Environmental Manager

**STATUS OF PERMIT:**

Permit To Operate (PTO) issued September 2, 2005  
 PTO scheduled expiration September 2, 2008  
 Permit extension request letter submitted to SWS, dated March 5, 2008  
 Permit under review by SWS – Permitting Branch, February 16, 2011

**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 February 28, 2011, John Patrone met with Bill Perry and James Winegar to conduct a comprehensive audit of the OmniSource Southeast LLC – Kernersville Plant Auto Shredder Residue Reclamation Operation in Kernersville, Forsyth County.

1. OmniSource Southeast LLC - Kernersville Plant is a scrap metal processing yard. It collects scrap metal from the general public, scrap metal haulers, and industry. A guillotine shear and shredder are used to chop bulk scrap metal. The facility also has a public drop-off building located at the front of its lot and numerous (scrap metal) boxes and trailers located at businesses throughout the region. Processed scrap metal is shipped-out by truck and railcar.
2. The facility is permitted to operate an auto shredder residue (ASR) reclamation operation that segregates ferrous and non-ferrous, and different constituents of non-ferrous, metals from ASR. A closed industrial/ASR landfill is located at the OmniSource Southeast LLC - Kernersville Plant. A three-story ASR scrap metal sorting operation has been constructed and is owned by Second Pass LLC and several pieces of machinery used for material handling.
3. The Second Pass scrap metal sorting operation is composed of two independent metal sorting lines. Each sorting line can run mined ASR or newly derived ASR. Mined ASR is exclusively sorted by the Second Pass metal sorting operation. Waste from the mined ASR is placed back into the ASR landfill. Waste from newly derived ASR is collected and shipped-out to Allied Waste Charlotte Motor Speedway Landfill (permit No. 13-04). The permit does not authorize the disposal of newly processed ASR or any other newly derived solid waste back into the facility's industrial/ASR landfill.
4. Mr. Perry stated that ~ 1/3 of the scrap metal from the ASR landfill has been reclaimed by a previous scrap metal sorting operation and the remaining 2/3 is scheduled to be reclaimed over the next 2 to 4 years.
5. The equipment used to construct the Second Pass metal sorting operation and the way it is configured is considered proprietary. The scrap metal sorting operation currently processes newly derived ASR and mined ASR. Mined ASR is processed when moisture content is within the operational limit. Mr. Perry stated that the scrap metal operation began processing mined ASR in February 2010.
6. The facility site plan and operations plan were discussed. Ensure that the operations plan and site plan are updated accordingly to reflect the Second Pass scrap metal sorting operation.
7. The ASR reclamation operation is part of the facility's closure process. Daily and intermediate cover is not required unless windblown material is evident. The ASR landfill has ~ 24 acre footprint and is ~ 75 feet deep.
8. The facility will excavate and refill the interior of the ASR landfill, leaving the banks intact. The banks will be pulled-in in order to reclaim material but maintained/reconstructed to limit runoff.
9. The facility conducts employee training in: fire prevention, LOTO, housekeeping, Hazmat, PPE, hot work program, fall protection, ladders/steps, annual injury review, mobile equipment safety, hearing protection, equipment training (as applicable), cardinal rules (task specific), and spill response.
10. The facility will stockpile feedstock (mined ASR) adjacent to the scrap metal sorting operation atop the landfill prior to sorting.
11. The facility maintains throughput records that document the amount of ASR material processed/removed (from the landfill) and the amount of ASR material recovered/sold (ASR removed – ASR recovered = ASR material returned to landfill). Monthly and annual records were verified. From February through December 2010 the facility removed 122,176 tons, recovered 2,665.02 tons, and returned 119,510.98 tons (totaling 244,352 tons). And in January 2011 the facility removed 17,823 tons, recovered 409.81 tons, and returned 17,413.19 tons.
12. Reclaimed product/collected scrap metal will be stored in piles, containers, and/or covered bins until shipped.
13. The facility plans to use commingled ASR waste fines (from the mined scrap metal sorting operation) for the top layer of the landfill after waste material is returned.

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14. The facility is constructing a second Second Pass scrap metal sorting operation adjacent to the permitted Second Pass scrap metal sorting operation. The second Second Pass operation will sort 19 millimeter and smaller fines from the permitted Second Pass operation. Construction began on the second Second Pass operation in October 2010 and is expected to be completed in April 2011. The facility will use the second Second Pass operation for newly derived ASR fines but may want to also use it for mined ASR fines. Mr. Perry and Mr. Winegar were told to contact John Murray, SWS – Environmental Engineer, to modify the permit accordingly.
15. In case of emergency the Kernersville Fire Department will respond to a fire at the facility. The facility has a fire hydrant on-site that can be utilized by trained staff and fire extinguishers mounted to the Second Pass scrap metal sorting operation.
16. There was no indication of erosion or runoff. The facility has constructed numerous catch basins around the ASR landfill, including a series of catch basins adjacent to the new scrap metal sorting operation.
17. A proper sign was posted at the entrance to the scrap metal sorting operation/ASR landfill area.
18. The facility is secured by a gate at the entrance to the lot and personnel and/or security guards are on site 24-hours a day, 7-days/week.

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>March 9, 2011</u> by	<b>X</b>	Email		US Mail		Certified No. [ ]
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- cc: Jason Watkins, Central Regional Supervisor  
 Donald Herndon, Compliance Officer  
 John Murray, Environmental Engineer  
 James Winegar, Environmental Manager - OmniSource Southeast