



FACILITY COMPLIANCE AUDIT REPORT

Division of Waste Management Solid Waste Section

UNIT TYPE:

Lined MSWLF		LCID		YW		Transfer		Compost		SLAS		COUNTY: Guilford PERMIT NO.: 41-16 FILE TYPE: COMPLIANCE
Closed MSWLF		HHW		White goods		Incin		T&P	<input checked="" type="checkbox"/>	FIRM		
CDFL	<input checked="" type="checkbox"/>	Tire T&P / Collection		Tire Monofill		Industrial Landfill		DEMO		SDTF		

Date of Audit: 03/09/11**Date of Last Audit:** 05/20/10**FACILITY NAME AND ADDRESS:**

WCA of High Point, LLC
 5830 Riverdale Drive
 Jamestown, N.C. 27282

GPS COORDINATES: N: 35.95144 E: 79.92173**FACILITY CONTACT NAME AND PHONE NUMBER:**

John Walker, General Manager
 Office: 336-886-3560
 Mobile: 336-669-2086
 e-mail: jawalker@wcamerica.com

FACILITY CONTACT ADDRESS:

Same

AUDIT PARTICIPANTS:

John Waker, WCA of High Point, General Manager
 Anita McNeil, WCA, Regional Controller
 Hugh Jernigan, N.C. Solid Waste Section

STATUS OF PERMIT:

Permit to Construct (Reclamation Pad) Issued: March 13, 2003
 Permit to Construct (Phase 1 Construction and Demolition Landfill) Issued: May 14, 2003
 Original Permit to Operate (Phase 1 Cell A C&D Landfill and Reclamation Pad) Issued: February 10, 2004
 Permit to Operate (Operational Plans, Service Area Change, Cells 2&3 C&D LF) Issued: December 9, 2004
 Permit to Operate (Ownership Name Change, Cells 4&5) Issued: December 28, 2007
 Permit to Construct (Phase 2 Landfill) Issued: February 20, 2009
 Permit to Operate (Phase 1; Cells 1,2,3,4,5 C&DLF and Reclamation Pad) Issued: February 20, 2009
 Permit to Operate (Phase 2A C&D LF, Reclamation Pad) Issued: July 21, 2010
 Permit Expiration Date: **February 14, 2014**

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.

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STATUS OF PAST NOTED VIOLATIONS:

NONE

AREAS OF CONCERN AND COMMENTS:

1. The facility consists of a Construction & Demolition Waste Treatment & Processing Operation and a Construction & Demolition Landfill.
2. The facility began operations on February 15, 2004.
3. Service area for the facility currently includes Guilford, Davidson, Forsyth, and Randolph Counties.
4. The most recent franchise agreement with the City of High Point (Ordinance No. 6622/09-22) was passed on May 18, 2009 granting the franchise to operate a Construction and Demolition Debris Recycling Operation and Landfill at the site until February 21, 2035. The franchise agreement also increases the service area for the facility by adding Rockingham, Caswell, Alamance, Orange, Cabarrus, Rowan, Davie, Yadkin, Surry, and Stokes Counties.
5. The facility submitted an Application for Substantial Permit Amendment to the Solid Waste Section on June 2, 2010 for an increase of the service area for the facility (as listed in the franchise agreement with the City of High Point), and modifications in the Operational Plans. The application is currently under review by the Solid Waste Permitting staff and is currently under a public comment period (March 1- April 15, 2011).
6. Reviewed Permit and Operational Plans for the facility.
7. The facility has submitted closure/post closure plan and financial responsibility requirements in accordance with 15A NCAC 13B .0547.
8. The facility has a Storm Water Permit issued by the Water Quality, Surface Water Protection Branch, and was recently inspected by the Water Quality Section .
9. Reviewed operational records for the facility including tonnage reports (incoming and outgoing materials from the reclamation operations, landfill disposal).
10. The facility receives approximately 200-300 tons per day. Reviewed February 2011 tonnage reports. The facility received (inbound) 5,433.90 tons for the period and outbound tonnages from recycling operations were 782.23 tons.
11. Reviewed training/operator certification records. The landfill operator certifications on file include: John Walker, Certified Landfill Manager, expiration 03/18/13; Clyde Herrin- Landfill Operations Specialist, expiration 10/08/13; Joe Richardson- Landfill Operations Specialist, expiration 10/08/13; Andy Tucker- Landfill Operations Specialist, expiration 03/08/13.
12. Reviewed the random inspection program, contingency plans, and random inspection reports. One random inspection per day is conducted in accordance to the approved Operations Plan. The facility also conducts 5 additional inspections of incoming loads for company quality assurance purposes.
13. The facility also maintains "Load Refusal Records" for incoming loads of waste, which were turned away from the site. Reviewed recent load refusal records.
14. Reviewed the most recent groundwater/surface water semiannual monitoring report on file for the sampling event conducted July 1-2, 2010. The last groundwater/surface water semiannual monitoring event occurred in January 2011.
15. Reviewed methane monitoring program. Five methane monitoring wells, scale house, break room, and maintenance area are being monitored. The facility contracts the methane monitoring with Golder Associates utilizing a GEM 2000plus monitor. The last quarterly methane monitoring event occurred on January 14, 2011 and no measurable amounts of methane were detected.
16. Observed Construction and Demolition landfill operations.
17. Currently operating in the Phase 2A.
18. Windblown materials effectively controlled and collected.
19. Working face observed to be small, well controlled, and well compacted.
20. Excellent soil cover observed from recent daily operations. Fines generated by the treatment and processing operations are utilized as initial cover daily. Soil cover is applied weekly. Intermediate soil cover is in place on the Phase 1, Cells 1-5 areas. Additional seeding is to be conducted in the Phase 1 area within the next two weeks.

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21. Erosion control measures and sedimentation basins well maintained, no off-site erosion noted.
22. Facility staff periodically inspects side slopes for weak areas and potential leachate seeps. Minor repairs on the side slopes on the west facing area of the landfill have been conducted recently.
23. Roadways well maintained throughout the facility.
24. Monitoring wells observed to be locked and accessible.
25. Observed Treatment and Processing operations.
26. Amount of waste to be processed on the incoming waste tipping pad was observed to be well controlled. The facility has fabricated a tarping system to cover waste and the end of the operating day Note: Permit Condition #28 requires " Only an amount of waste sufficient to begin sorting operations the next day may be left on the tipping pad" and all waste on the tipping pad must be covered by a tarp at the end of the day
27. The picking line was not in operation during the inspection due to rain.
28. Materials received by the facility are being sorted, processed, and stored as per approved operational plans.
29. A large pile of aggregate on site generated by the recycling and crushing operations is being rescreened prior to sale.
30. The facility is accepting shingles which are picked up by S. T. Wooten Company for processing and utilization in hot mix asphalt. During the month of February 696.11 tons of shingles were taken by S. T. Wooten.
31. Wood being stored on site is to be ground within a month for boiler fuels and mulch.
32. A dumpster is located at the reclamation pad and on the landfill for disposal of any incidental unacceptable materials found in incoming loads.
33. Windblown materials effectively controlled by utilization of fences at the treatment and processing area, no fugitive dust problems were observed.
34. Observed incoming loads of waste. All incoming waste appeared to be consistent with requirements of the permit.

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



 Hugh Jernigan
 Environmental Senior Specialist
Regional Representative

Phone: 336-771-5093

Delivered on : <u>03/10/11</u> by	X	e-mail		US Mail		Certified No. []
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cc: Jason Watkins, Central District Supervisor
 Donald Herndon, Compliance Officer
 Pat Backus, Solid Waste Permitting