revised 12/1/2006 8:25 AM

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		LCID		YW		Transfer		Compost		SLAS	
Closed MSWLF		HHW		White goods		Incin		T&P	X	FIRM	
CDLF	X	Tire T&P / Collection		Tire Monofill		Industrial Landfill		DEMO		SDTF	

COUNTY: Guilford
PERMIT NO.: 41-16
FILE TYPE: COMPLIANCE

Date of Audit: 11/08/06. Date of Last Audit: 07/25/06

FACILITY NAME AND ADDRESS:
WCA of High Point, LLC
5830 Riverdale Drive
Jamestown, N.C. 27282

GPS COORDINATES: (Decimal Degrees) N: 35.95144 **E**: 79.92173

FACILITY CONTACT NAME AND PHONE NUMBER:
Mike McFeeley, General Manager
Office: 336-886-3560
Mobile: 336-669-2086
e-mail: mmcfeeley@wcamerica.com

FACILITY CONTACT ADDRESS (IF DIFFERENT):
Same

AUDIT PARTICIPANTS:
Mike McFeeley, WCA of High Point
Angela Smith, WCA of High Point
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
Permit to Operate Phase 1 Cell A C&D Landfill and Reclamation Pad Issued: February 10, 2004
Permit Modification, Operational Plans, Service Area Change, Cells 2&3 C&D Landfill: December 9, 2004
Permit Expiration Date: **February 10, 2009**

PURPOSE OF AUDIT:
Comprehensive Audit

NOTICE OF VIOLATION(S) (citation and explanation):
None

You are hereby advised that, pursuant to N.C.G.S. 130A-22, an administrative penalty of up to $5,000 per day may be assessed for each violation of the Solid Waste Statute or Regulations. If the violation(s) noted here continue, 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):
From July 25, 2006 inspection: None
From March 28, 2006 inspection:

1. 15A NCAC 13B .0505 (11) (a) "A site shall only accept those waste which it is permitted to receive."
2. Permit Condition #9 included in Permit No. 41-16 " This solid waste management facility is permitted to receive the following waste types:

a. Land-clearing debris as defined in G.S. 130A-290, specifically, solid waste that is generated solely form land-clearing activities, such as stumps, trees, etc.;
b. Inert debris defined as solid waste which consist solely of material that is virtually inert, such as brick, concrete, rock, and uncontaminated soil;
c. Asphalt in accordance with G.S. 130A-294(m);
d. Construction and demolition debris defined as solid waste resulting solely from construction, remodeling, repair or demolition operations on pavement, buildings, or other structures;"

AREAS OF CONCERN AND COMMENTS:

1. The facility consists of a Construction and Demolition Treatment and Processing Operation and a Construction and Demolition Landfill.
2. The facility began operations on February 15, 2004.
3. The site is permitted as MRR of High Point, LLC. The facility was purchased by Waste Corporation of America (WCA) and now is operating under the name WCA of High Point, LLC as of April 1, 2005. A request for a name change and modifications to the Operation Plans was by submitted by WCA. Permit re-issuance is currently under review by Solid Waste Permit Section.
4. The facility has also submitted (May 2006) CQA documents for the recently constructed cells #4 and #5 in the Construction and Demolition Landfill.
5. Service area for the facility originally included Guilford County and portions of Davidson, Forsyth, and Randolph Counties as specified in the franchise agreement with the City of High Point. The service area was amended at the High Point City Council meeting of May 3, 2004 to include all of Guilford, Davidson, Forsyth, and Randolph Counties.
6. The High Point City Council approved the first reading of the new franchise agreement (name change clarification) on November 6, 2006. The required second reading for final approval should be scheduled within two weeks.
7. Reviewed the most recent semiannual monitoring report for sampling conducted on July 12, 2006. Monitoring wells were observed to be locked, labeled, and are on concrete pads.
8. Reviewed operational records for the facility including tonnage reports (incoming and outgoing materials from the reclamation operations, landfill disposal).
9. The facility receives approximately 300 tons per day. Review of tonnage reports for October 2006 indicated 6,979.71 tons of waste received (incoming) and 1,107.69 tons outgoing from treatment and processing operations
10. Reviewed training/operator certification records. The facility currently has five landfill operator certifications on file: Mike McFeeley- Certified Landfill Manager, expiration 02/22/08; Clyde Herrin- Certified Landfill Operators Certification, expiration 10/08/07; Joe Richardson- Certified Landfill Operators Certification, expiration 10/08/07; Andy Tucker- Certified Landfill Operators Certification, expiration 02/28/09; Kenneth Deal- Certified Landfill Operators Certification, expiration 10/08/07.
11. The facility conducts random inspections at both the landfill and treatment and processing operation locations. Reviewed the random inspection reports for both areas. The random inspections are being conducted one per day for both locations. The facility also maintains "Load Refusal Records" for incoming loads of waste, which were turned away from the site. Reviewed recent load refusal records.

12. Observed Construction and Demolition landfill operations.
13. Currently operating in the permitted cells 1-3 areas. The CQA documentation was submitted in May 2006 for the constructed cells 4 and 5. The facility currently has approximately 4-6 months of air space available in cells 1-3.
14. Windblown materials effectively controlled and collected.
15. Working face observed to be small, well controlled, and well compacted. Excellent cover from recent daily operations. Intermediate cover and seeding has been conducted on areas not currently being utilized. Vegetation has been established on side slopes.
16. Erosion control measures and sedimentation basins well maintained, no off-site erosion noted.
17. Roadways well maintained throughout the facility.
18. Observed reclamation pad (treatment and processing) operations.
19. The picking line was not in operation during the inspection, due to a motor malfunction on the picking line conveyor system the previous day. Reclaimed materials being sorted to stockpiles during the inspection.
20. Most of the woodwaste collected from the reclamation operations has been ground and removed from the site. A large stockpile of concrete is scheduled for grinding within the next week. Other collected materials were in proper stockpiles or containers. Tires found in incoming loads are collected and sent to a tire collection/disposal facility.
21. A dumpster is located at the reclamation pad and on the landfill for disposal of any incidental unacceptable materials found in incoming loads.
22. Windblown materials effectively controlled by utilization of fences at the treatment and processing area, no fugitive dust problems were observed.
23. Materials on site and observation of incoming loads during the inspection indicated waste was generated from construction and demolition operations.

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: Amy Annechino
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WSRO Files