



FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

UNIT TYPE:

Lined MSWLF		LCID		YW		Transfer		Compost		SLAS		COUNTY: Guilford PERMIT NO.: 41-17 FILE TYPE: COMPLIANCE
Closed MSWLF		HHW		White goods		Incin		T&P	X	FIRM		
CDLF	X	Tire T&P / Collection		Tire Monofill		Industrial Landfill		DEMO		SDTF		

Date of Audit: 07/14/10

Date of Last Audit: 03/17/10

FACILITY NAME AND ADDRESS:

A-1 Sandrock, Inc.
 2901 Bishop Road
 Greensboro, North Carolina, 27406

GPS COORDINATES: **N:** 35.99210 **E:** 79.84738

FACILITY CONTACT NAME AND PHONE NUMBER:

Ronnie E. Petty III
 Office: 336-855-8195
 Cell: 336-736-2104
 Mike McFeeley
 Office: 336-855-8195
 Cell: 336-301-8411
 e-mail: al sandrock@bellsouth.net
 mike@arc-recycling.com

FACILITY CONTACT ADDRESS:

A-1 Sandrock, Inc.
 2901 Bishop Road
 Greensboro, North Carolina, 27406

AUDIT PARTICIPANTS:

Mike McFeeley, A-1 Sandrock
 Chad Morris, ARC
 Hugh Jernigan, North Carolina Solid Waste Section
 Lee Hill, Guilford County Code Enforcement

STATUS OF PERMIT:

Original Permit to Construct, Phase 1 (Cells A, B, C) Issued: February 7, 2004
 Permit to Construct Modification Issued: June 1, 2006
 Permit to Operate Phase 1, Cell A Issued: April 17, 2009
Permit Expires: November 6, 2013

PURPOSE OF AUDIT:

Comprehensive Audit

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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.

STATUS OF PAST NOTED VIOLATIONS:

NONE

AREAS OF CONCERN AND COMMENTS:

1. The facility is a Construction and Demolition Landfill and Treatment and Processing facility.
2. The facility received a Permit to Construct, dated June 1, 2006, for the construction of the Phase 1 Construction and Demolition Landfill (8.18 acres- Cell A 2.54 acres, Cell B 3.18 acres, Cell C. 2.46 acres).
3. A Permit to Operate was issued on April 17, 2009 for Phase 1, Cell A (2.54 acres) of the Construction and Demolition Landfill, and for the Treatment and Processing operations.
4. The facility began receiving waste on April 20, 2009.
5. The approved location for maintenance of records is 2901 Bishop Road.
6. Conducted a review of the conditions of the Permit to Operate, Franchise Agreement, Facility Operational Records, and Facility Operations Plan.
7. The facility is permitted to receive waste generated in counties within a fifty (50) mile radius of the site as approved in the franchise agreement with Guilford County, including Alamance, Cabarrus, Caswell, Chatham, Davidson, Davie, Durham, Forsyth, Guilford, Lee, Montgomery, Moore, Orange, Person, Randolph, Rockingham, Rowan, Stanly, Stokes, Surry, and Yadkin counties.
8. The Construction and Demolition Landfill is regulated by 15A NCAC 13B, .0531-.0547 for current operations and all future landfill cell construction.
9. The Permit has been recorded with the Guilford County Register of Deeds and submitted to the Solid Waste Section, as required under Attachment 1, Part IV, General Permit Conditions, Item #3 of the Permit to Operate.
10. Financial Assurance documentation has been submitted and approved by the Solid Waste Section.
11. Reviewed operator training records for the facility. The following have approved SWANA certifications: Mike McFeeley, Certified Landfill Manager, expires 02/22/11; Ronald Petty, Certified Landfill Operations Specialist, **expired 12/06/09**; James Sweeney Certified Landfill Operations Specialist, and George Sudderth, Certified Landfill Operations Specialist, expires 02/15/12.
12. The facility is approved to accept up to 300 tons per day or 84,000 tons per year based on 5.5 day working week and 52 weeks per year.
13. The facility is currently accepting approximately 250 tons per day (based on June 2010 tonnage records) of Construction and Demolition waste.
14. Review of tonnage records indicated the facility received 6,779.32 tons during the month of June 2010. Incoming tonnages of construction and demolition waste was much higher than normal due a large demolition project at UNC-G.
15. The facility generated 422.89 tons of recycled concrete (ABC and Surge), 14,280 pounds of Aluminum, 15.23 tons of cardboard, and 2,142.2 pounds of metals from recycling operations during the month of June 2010.
16. A recycling process to reclaim at least ten percent (10%) of the waste received must be implemented by the facility in accordance with the approved franchise agreement (dated November 6, 2003 and amended March 17, 2009) with Guilford County.
17. The facility has an approved NPDES Storm Water permit (NCG020458), reissued on December 29, 2009
18. The facility has an active mining permit (North Carolina Mining Permit 41-22) issued by Land Quality.
19. Reviewed the Surface Water/Ground Water/Landfill Gas monitoring program (5 ground water monitoring wells, 4 surface water monitoring locations and 7 landfill gas probes).

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20. The analysis of the April 9, 2010 semiannual ground water/surface water monitoring sampling event indicated VOC contaminants which also were present in the equipment and sample blanks. Re-sampling was conducted May 20, 2010. The monitoring/analysis report for the May 20, 2010 sampling event is being prepared.
21. Landfill gas monitoring is conducted semiannually as per the approved Operations Plan. Sampling is conducted with a GEM 500 monitor under rental contract. Calibration information is supplied with the rented monitor for each sampling event. Last landfill gas monitoring event was conducted April 10, 2010. **The monitoring results were not available during the audit. Please submit to Hugh Jernigan the results of the April 10 monitoring event by July 30, 2010. Note: Calibration records for the landfill gas monitor should be included in the results of future monitoring events. Also assure monitoring is conducted in facility structures and results included in the event report.**
22. Reviewed random inspection/waste screening program and recent random inspection reports. The approved Operations Plan requires a minimum of three random inspections of incoming waste to be conducted weekly. The facility is conducting one random inspection per day. **Recommend the random inspection reports contain more specific information on waste observed during the inspection and contain a verification the incoming waste is C&D waste.**
23. As per the approved Operations Plan, the facility is to maintain and document activities on an Operation and Maintenance (O&M) Checklist. Documentation of daily, weekly, monthly, and semi-annual action items as listed in the approved Operational Plan are to be included on the O&M Checklist. Reviewed the O&M Checklist completed for last two months. Previously recommend deleting the daily inspection section of the checklist and maintaining weekly, monthly, and semiannual action items.
24. **Note: Although included in the O&M Checklist--Recommend a separate log be maintained for weekly soil cover to indicate date and time of soil cover placement to maintain compliance as per .0542 (f)(1) "Soil Cover Requirements"**
25. Observed Treatment and Processing operations and Construction and Demolition Landfill operations.
26. Entrance signs to facility contains all requirements of .0542 (j)(5) and (6) for hours of operation, procedures, permit number, waste acceptance and waste exclusions.
27. The facility is currently operating in Phase 1 Cell A. Construction is ongoing for completion of Phase 1 Cells B and C. Landfill construction certification documents are to be submitted shortly.
28. Incoming construction and demolition waste entering the facility is directed to the Phase 1 Cell A area where the waste is dumped for pre-sorting (removal of large concrete, wood, and metal debris by a track hoe). The material is then loaded onto a screen and conveyor to a portable picking line. Active sorting of recyclables was being conducted by a covered portable picking line on the C&D Landfill during the inspection of the facility. The picking line was staffed by 7 workers during the inspection, mainly reclaiming wood, cardboard, and metals from the waste stream. Waste from the picking line and fines from the screening operation are periodically pushed to the landfill working face.
29. **Note: The Permit to Operate, Part IV, Condition # 34 requires the amount of materials stockpiled (raw and processed material) to be limited to 6,000 cubic yards. Estimates during the audit of the cubic yards of stockpiled incoming waste and separated wood to be ground for boiler fuel indicate approximately 4,000-5,000 cubic yards to be on site in the Phase 1 Cell A area. It is recommended resources be utilized to reduce the current stockpile to prevent potential violations of Permit Condition #34.**
30. Grinding of the wood stockpile for boiler fuel production is scheduled within the month.
31. The working face of the C&D Landfill was small and well compacted.
32. Processing (tipping, sorting, loading of recyclables) from incoming C&D waste is to be conducted near the working face of the C&D Landfill at a minimum of 50 feet from the working face as per Permit to Operate, Permit Condition #36.
33. The Treatment and Processing of C&D waste and collected recyclable materials are being stored in containers or stockpiled as per the approved Operations Plan.

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34. Materials currently being separated and processed include wood products (for boiler fuel and mulch), earthen inert materials (rock, stone, concrete... for processing into aggregate), metals, and cardboard.
35. Incoming LCID waste is stockpiled in a separate area inside the footprint of the C&D Landfill facility prior to shredding or grinding into boiler fuel, mulch, or aggregate. Note: Acceptable LCID waste does not include "Yard Trash" which is defined as solid waste resulting from landscaping and yard maintenance such as brush, grass, leaves, tree limbs, and similar vegetative materials. This type of waste typically has a high nitrogen content and could result in elevated temperatures, composting of materials, and potential fires in vegetative storage piles. Care should be taken to prevent the acceptance of any yard trash waste.
36. The Treatment and Processing operations are separated into C&D and LCID components.
37. LCID materials are not to be combined with other materials prior to being processed. C&D and similar LCID materials may be combined for final processing (such as wood waste to be ground for boiler fuels and inert debris to be crushed for aggregate).
38. Proper signage for the facility was observed.
39. Windblown materials have been effectively controlled and collected.
40. Adequate all weather roads have been constructed for ingress and egress at the facility. The facility is planning to purchase a water truck for dust control.
41. Edge of waste boundary markers were in place for the Phase 1, Cell A landfill area during previous inspections. The edge of waste boundary markers were removed for side slope maintenance. **Permanent edge of waste boundary markers are to be maintained at all times for all landfill areas permitted to receive waste. Please submit documentation of permanent edge of waste boundary markers have been replaced to Hugh Jernigan by July 30, 2010**
42. Sedimentation basins in place, and maintained with adequate retention space.
43. Observed facility groundwater monitoring wells. Facility monitoring wells are locked and properly labeled.
44. The Permit to Operate (Permit Condition #40) included approval of a Treatment and Processing operation for a six (6) month demonstration period (until October 20, 2009), and required the permittee to submit a report to the Solid Waste Section on the operation of the demonstration within 20 days of the completion of the 6 month demonstration, including suggested or necessary changes for the Solid Waste Section to review the report, extend the demonstration, approve the operation, or terminate approval.
45. The report of the demonstration period dated December 21, 2009 was submitted to the Solid Waste Permitting Section.
46. Conducted a review of the submitted report for the demonstration project.
47. The report covers the period April 17-October 31, 2009. During this period the facility received 8,957.56 tons of Construction and Demolition debris. The facility collected and processed concrete (2801 tons), cardboard (53.46 tons), metals (202.44 tons), and wood (87.44 tons) from the incoming waste stream.
48. Based on the inspection of the facility and review of the report, recommendations are as follows:
 - A. Concurrence with the suggested changes as submitted on Page 5, Section 4.0 of the report.
 - B. Submittal of a site plan showing actual and potential storage/processing areas within the site, with site plan modifications as new landfill cells are constructed and permitted to operate.
 - C. The daily facility inspection checklist is not necessary. A weekly inspection checklist is sufficient.
 - D. Co-mingling of concrete from LCID and C&D sources is acceptable. Separate processing of wood waste should be continued.
 - E. Permit to Operate, Attachment 3, Part IV, Conditions of Operating Permit, Permit Condition #36 should be amended for clarity along with Section 6.4.3 of the Operations Plan. The intent of the permit condition is not clear.
 - F. Permit to Operate, Attachment 2, Conditions of Permit to Construct, Permit Condition #1 should be clarified. Construction approval was issued for entire Phase 1 of the C&D Landfill in the February 7, 2004 Permit to Construct.
 - G. Recommend continued approval in the Permit to Operate for the Treatment and Processing/Recycling Operation.

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



Phone: 336-771-5093

Hugh Jernigan
Environmental Senior Specialist
Regional Representative

Delivered on : <u>07/25/10</u> by	<input checked="" type="checkbox"/>	e-mail	<input type="checkbox"/>	US Mail	<input type="checkbox"/>	Certified No. []
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- cc: Mark Poindexter, Solid Waste Section Field Operations Branch Supervisor
- Jason Watkins, Solid Waste Section Central District Supervisor
- Donald Herndon, Solid Waste Section Compliance Officer
- Ming Chao, Solid Waste Section Permitting