



**FACILITY COMPLIANCE AUDIT REPORT**  
**Division of Waste Management**  
**Solid Waste Section**

**UNIT TYPE:**

Lined MSWLF		LCID		YW		Transfer		Compost		SLAS		COUNTY: HALIFAX PERMIT NO.: 42-03 FILE TYPE: COMPLIANCE
Closed MSWLF		HHW		White goods		Incin		T&P		FIRM		
CDLF		Tire T&P / Collection		Tire Monofill		Industrial Landfill	<input checked="" type="checkbox"/>	DEMO		SDF		

**Date of Audit:** April 6, 2010 and October 28, 2009

**Date of Last Audit:** March 5, 1996

**FACILITY NAME AND ADDRESS:**

Champion International Industrial Landfill  
 North Roanoke Avenue  
 Roanoke Rapids, NC 27870

**GPS COORDINATES:** N: 36.46768                      W: 77.63978

**FACILITY CONTACT NAME AND PHONE NUMBER:**

Philip Slowiak, Office 901-419-3845, Cell 901-604-1952 Fax 901-214-9550, philip.slowiak@ipaper.com

**FACILITY CONTACT ADDRESS:**

Philip J. Slowiak Sr., CSP  
 Senior Project Manager  
 Environmental Remediation Group  
 INTERNATIONAL PAPER COMPANY  
 6400 Poplar Avenue  
 Memphis, TN 38197

**AUDIT PARTICIPANTS:**

Mary Whaley, NCDENR, Solid Waste  
 Myrl Nisely, NCDENR, DWQ, Storm Water Protection  
 Chris Puryear, KapStone Paper and Packaging Corporation

**STATUS OF PERMIT:**

CLOSED

**PURPOSE OF AUDIT:**

Partial 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.

**STATUS OF PAST NOTED VIOLATIONS:**

NONE

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**AREAS OF CONCERN AND COMMENTS:**

1. The 23.5 acre Champion Industrial Landfill closed prior to January 1, 1998.
2. The site was permitted on May 6, 1981. The site was permitted for flyash, sawdust, bark, concrete, asbestos and wood pallets. In March 1997, Champion generated and disposed of a large headbox and lengths of pipe containing Naturally Occurring Radioactive Material (NORM) with approval by the Solid Waste Section.
3. Edge of Waste markers have been established at the site.
4. The August 1997 OPERATIONAL AND CLOSURE PLAN FOR FLYASH DISPOSAL AREA- UPDATE, Section 8.0 states: *"The Flyash Disposal Area will be inspected on a regular basis and after significant storm events for signs of erosion, settlement and subsidence. Areas of erosion, settling or subsidence will be addressed immediately by the placement of additional fill material to restore the final grading contours and re-establishment of the vegetative cover.* Soil has been added to subsided areas on the top surface of the LF. There was no evidence of these areas having been seeded to establish ground cover. There is a large quantity of river rock in most of the soil used to correct the subsided areas, which would make the establishment of a good ground cover difficult. It is strongly recommended that a soil free of rocks be added to promote the growth of ground cover.
5. There is a good stand of thick grasses growing on the top surface of the LF, where the soil has not been added to correct the subsidences.
6. The August, 1997, UPDATE, states in Section 3.0 that *"After the final cover is completed, the asbestos area will be delineated by signs."* There are no signs at the site.
7. The side slopes are greater than 3:1 and there are trees growing on the side slopes, but the August, 1997, OPERATIONAL AND CLOSURE PLAN FOR FLYASH DISPOSAL AREA- UPDATE, states in Sect. 6.0- *"Naturally occurring grasses such as Johnson Grass and Crabgrass, as well as bushes and trees will compete with the planted grass mixture to further enhance erosion control."* And *"On August 18, 1990 Champion, Rust (Environmental and Infrastructure) and Solid Waste representatives agreed that it would not be appropriate to disturb heavily vegetated side slopes. Therefore as previously discussed and documented in the April, 1991 Operational and Closure Plan, the placement of final cover material and vegetative cover does not apply to areas with existing dense vegetation."* The original OPERATIONAL AND CLOSURE PLAN FOR FLYASH DISPOSAL AREA, dated October, 1990 and revised April, 1991, states in Section II, OPERATION AND FINAL GRADING, B, Final Grading: *"The final grading of the flyash disposal area will be as shown in Drawing R-0009-SP-02. The operator will ensure that maximum side slopes in areas not yet filled to not exceed 2:1 as indicated on Drawing No. R-0009-SP-02."* Section III, CLOSURE, A. Vegetative Cover states: *"As previously discussed with the Solid Waste Section (see meeting history in Appendix A), the placement of compacted earth on the flyash piles to provide a cap would necessitate destruction of the established vegetation. Also, reshaping of the existing piles for flatter side slopes would cause increased erosion and may disturb previously placed asbestos. These activities may have more environmental impact than the alternative of not capping the landfill and establishing vegetation to completely stabilize the area. The majority of the side slopes of the existing ash piles are well vegetated and stabilized by naturally occurring vegetation. There appears to be little to no on-site erosion of the piles and no off-site siltation from the landfill area. Upon closure, the disposal areas will be stabilized with vegetation that can be supported by the flyash alone and which will provide good coverage and erosion control characteristics..."*
8. It is strongly recommended that in the fall or winter when the actual contour of the cap may be more visible, any further subsidence or possible ponding water issues be addressed and corrected. Contact Ed Mussler, Permitting Branch Head, 1646 Mail Service Center, Raleigh, NC 27699-1646, if the same sludge mixture that was used at for the original closure, is being considered as material for use in correcting subsidences. Regular maintenance inspections must be performed as stated in the Closure plan.

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

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Mary Whaley  
Environmental Senior Specialist  
*Regional Representative*

Phone: 919-693-5023.

Delivered on : <u>April 22, 2010</u> by		Hand delivery	<input checked="" type="checkbox"/>	E Mail		Certified No. [ ]
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cc: Mark Poindexter, Field Operations Branch Supervisor  
Dennis Shackelford, Eastern District Supervisor  
Donald Herndon, Compliance Officer  
Ed Mussler, Permitting Branch Head