



FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

UNIT TYPE:

Lined MSWLF		LCID		YW		Transfer		Compost		SLAS		COUNTY: HENDERSON PERMIT NO.: 45-01 FILE TYPE: COMPLIANCE
Closed MSWLF	X	HHW		White goods		Incin		T&P		FIRM		
Closed CDLF	X	Closed CDLF atop Closed MSWLF	X	Asbestos Disposal Area(s)	X	TVA Industrial Landfill	X	DEMO	X	SDTF		

Date of Audit: 04/28/10

Date of Last Audit: 03/10/2010

FACILITY NAME AND ADDRESS:

Henderson County Solid Waste Transfer Facility
 802 Stoney Mountain Road
 Hendersonville, NC 28791

GPS COORDINATES: **N:** 35.35558 **E:** -82.49531

FACILITY CONTACT NAME AND PHONE NUMBER:

Marcus Jones, Henderson Co. Director of Engineering
 100 N. King Street
 Hendersonville, NC 28792

FACILITY CONTACT ADDRESS:

Henderson County Solid Waste Transfer Facility
 802 Stoney Mountain Road
 Hendersonville, NC 28971
 Facility Telephone: 828-697-4505

AUDIT PARTICIPANTS:

Andrea Keller, NCDENR– Solid Waste Section (SWS)
 Natalie Berry, Henderson Co.
 Dave Pasko, McGill Associates
 Steve Allen, Enerdyne

STATUS OF PERMIT:

MSWLF Transition Plan Approval – November 13, 1995
 MSWLF stopped receiving waste – December 31, 1997
 MSWLF and C&DLF on top of closed MSWLF Closure Permit – April 11, 2006
 C&DLF stand-alone PTO – October 4, 2001
 C&DLF stand-alone – Inactive (waiting on formal closure letter from the Section)

PURPOSE OF AUDIT:

Partial/Follow-up Audit

NOTICE OF VIOLATION(S):

None

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STATUS OF PAST NOTED VIOLATIONS:

Ongoing: **15A NCAC 13B .1627(d)(1)(A)** for failure to maintain the integrity and effectiveness of the closed MSWLF cap system. Compliance deadline for plan submittal: May 7, 2010.

Ongoing: **15A NCAC 13B .0505(4)(a) and (6)(a)** for failure to prevent excessive on-site erosion at the stand-alone C&DLF unit and failure to stabilize the site with native grasses within six months of final termination of disposal operations. Compliance deadline: June 4, 2010.

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.

AREAS OF CONCERN AND COMMENTS:

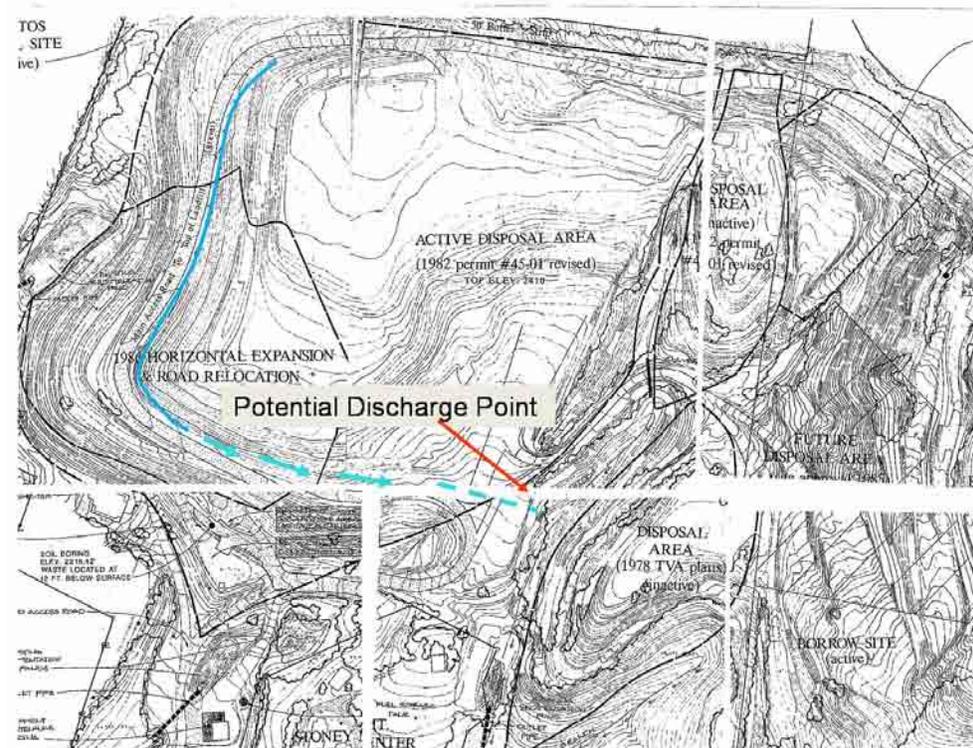
1. Met on site to review the Landfill Gas (LFG) monitoring, data, and plans, and to review the actions the County has taken since the 03/10/10 audit.
2. Work has been started on the closed MSWLF leachate seeps. Other areas that need continued improvement are:
 - Above extraction well #17;
 - Along the western side of the closed MSWLF (between MP-3 and MP-4, past the sedimentation pond);
 - The low spot exhibiting ponding on the east side of the LF (as viewed from the top of the most recently closed cell); and
 - At the access road (south side of LF toward the Enerdyne collection system) over waste which exhibited some ponding water. This road is in need of repair.
3. Improvements have been made along the drainage/creek along the TVA area (waste has been removed). (Item #4 in the General Comment section of the previous audit report). Both LFG monitoring wells MP-5 and MP-6 had PVC caps in place during follow-up audit.
4. Documents were located which indicated that six additional LFG monitoring wells had been installed on the adjacent (north side) Trace property. As late as 2000, three of the LFG wells remained (former wells #1, 2, and 5 appear to be destroyed/abandoned). Currently, LFG wells TR1, TR2, and TR3 (formerly #6, #4, and #3 respectively) are part of the ongoing monitoring at the LF along with monitoring probes MP-1 through MP-6. According to site representatives, MP-2 was accidentally destroyed since the previous audit.
5. The Transition Plan, approved in 1996, contains an Operations Plan section which discussed LFG monitoring. The Operations Plan restates the Rule requirement that LFG monitoring is required in all facility structures. While LFG monitoring occurred in the site structures during time of the assessment and LFG mitigation process, no recent data was available for review.
6. Structures on site include the: activity center, landfill office, scale house, landfill shop, transfer station structure, the Trace barn (along with shed and shop), and the Revis house. None of these structures are specifically cited in approved documents as requiring LFG monitoring, although the Trace properties are referenced in correspondence between the Section and the County as requiring monitoring. **During the upcoming permit renewal process, an updated Landfill Gas Monitoring Plan which includes all LFG monitoring points and all site structures which require monitoring should be submitted to the Section.** Questions regarding this plan should be directed to the permitting engineer, Larry Frost (828-296-4704). **In the interim, all structures which are occupied or utilized in any form (activity building, landfill office, scale house, landfill shop,**

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transfer station structure, and the Trace barn) should be immediately included as part of ongoing LFG monitoring.

7. While LFG MP-2 has recently been destroyed, this area is slated for construction as part of the new transfer station access road. Include discussion for replacement of this well in permit renewal submittals.
8. **It is recommended that all LFG monitoring wells (6 MP approved wells and the 3 remaining Trace property wells) be fitted with a port system (similar to that of the extraction wells) in order to improve confidence in the monitoring data.**
9. Continue to maintain access to all wells (groundwater, LFG probes, Trace property probes, extraction wells, etc).
10. Please discuss the possible on-site usage of the existing, un-composted Type I yard waste materials/mulch with the permitting engineer, Larry Frost.
11. During the site walk-through, Mr. Pasko noted that the area north of the westernmost sedimentation pond (between LFG probes MP-3 and PM-4) could potentially be an asbestos disposal area. During the permit renewal phase, please insure that all facility maps indicating fill locations have correctly identified the former asbestos fill area(s).
12. Conversations with the County and with Mr. Pasko indicated that the drainage ditch (detailed in comment #4 of the Closed MSWLF Comment section in the previous audit report) follows the inside of the LF access road until it reaches a point at which it can potentially discharge into surface water.



As this drainage ditch has exhibited exposed waste and potential leachate seeps, the County must contact the Section hydrogeologist (Jackie Drummond, 919-508-8500) to discuss assessment activities in order to determine if leachate has left the MSWLF site.

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



_____ (signature) Phone: (828) 296-4700

Andrea Keller
Environmental Senior Specialist
Regional Representative

Mailed on : <u>05/04/2010</u> by		hand delivery		US Mail X		Certified No. []
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- ec: Mark Poindexter, Field Operations Branch Supervisor
Deb Aja, Western District Supervisor
Donald Herndon, Compliance Officer
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