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

NCDENR
NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES

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

COUNTY: Iredell
PERMIT NO.: 49-03
FILE TYPE: COMPLIANCE

**Date of Audit:** August 27, 2010 **Date of Last Audit:** August 10, 2010 and August 11, 2010

**FACILITY NAME AND ADDRESS:**
Iredell County Landfill
354 Twin Oaks Road
Statesville, North Carolina 28625

**GPS COORDINATES:** N: 35.77114 W: 80.82346

**FACILITY CONTACT NAME AND PHONE NUMBER:**
David Lambert, Solid Waste Director (704) 878-5430

**FACILITY CONTACT ADDRESS:**
Same

**AUDIT PARTICIPANTS:**
David Lambert, Solid Waste Director
Terry Church, Landfill Supervisor
Charles Gerstell, NCDENR-Solid Waste Section

**STATUS OF PERMIT:**
The Permit to Operate a Municipal Solid Waste Landfill Unit Phase 4 was issued on July 30, 2008 and shall expire on July 30, 2013.

**PURPOSE OF AUDIT:**
Follow-up Audit

**NOTICE OF VIOLATION(S):**
No new violations

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:**

**15A North Carolina Administrative Code 13B .1626(8)(d) states:** *Leachate shall be contained on site or properly treated prior to discharge. An NPDES permit may be required prior to the discharge of leachate to surface waters.*

During an inspection performed on August 10, 2010, a leachate outbreak was observed on the southern portion of Phase 4 near the transition from the inactive Phase 3. Leachate from this outbreak was observed flowing beyond the edge of liner marker. Therefore, leachate was not properly treated prior to discharge. Iredell County was found in violation of 15A NCAC 13B .1626(8)(d)

To achieve compliance, Iredell County was directed to complete the following actions.

1. Monitor to assure leachate is contained on site or properly treated prior to discharge in accordance with 15A NCAC 13B .1626(8)(d).

2. To assess the impact of the leachate release outside the waste cell, Iredell County shall acquire the services of a N.C. licensed geologist with experience in assessment and remediation of ground water contamination and submit a phased assessment plan to the Division. The professional geologist shall consult with the Solid Waste Section Hydrogeologist about the site prior to developing the plan. The Section will review the submitted plan, approve, or request more information or amendments before implementation. The plan shall be implemented as approved. Within 30 days, submit this plan to:

   Ervin Lane, Compliance Hydrogeologist
   NCDENR-Division of Waste Management
   Solid Waste Section
   410 Oberlin Road, Suite 150
   1646 Mail Service Center
   Raleigh, North Carolina 27699-1646

3. Within 30 days, submit a revised leachate management plan to detail procedures to identify and repair any future leachate seeps and to prevent a leachate release beyond the liner system. Submit the revised plan to:

   Larry Frost, Regional Engineer
   NCDENR-Division of Waste Management
   Solid Waste Section
   2090 US Highway 7
   Swannanoa, NC 28778

The follow-up inspection performed on August 27, 2010 found no additional leachate outbreaks. A *Proposed Sample and Analysis Plan* was received by the Division on August 23, 2010 and approved on August 27, 2010. Please refer to the letter issued by Ervin Lane, Compliance Hydrogeologist, dated August 27, 2010. Therefore, items 1 and 2 have been addressed. The 30-day deadline for submittal of a revised leachate management plan is September 20, 2010. No plan had been received by the Division as of September 2, 2010. **This violation will remain unresolved until all of the above items have been addressed.**

**15A North Carolina Administrative Code 13B .1626(2)(a) states:** *Except as provided in (2)(b) of this Paragraph, the owners or operators of all MSWLF units must cover disposed solid waste with six inches of earthen material at the end of each operating day, or at more frequent intervals if necessary, to control disease vectors, fires, odors, blowing litter, and scavenging.*

Operational cover was inadequate on inactive areas south of the working face of the MSWLF unit during both inspections performed on August 10, 2010 and August 11, 2010. Therefore, Iredell County was found in violation of 15A NCAC 13B .1626(2)(a).

To achieve compliance, Iredell County was directed to cover all inactive areas with a minimum of six inches of earthen material within 5 days of issuance of the audit report with Notice of Violation(s).

During the follow-up inspection performed on August 27, 2010 the following was observed: All eroded gullies with exposed waste previously observed on August 10th and August 11th had been repaired. Good operational cover was observed on the slopes. Additional soil was also placed on inactive areas throughout the southern portion of the MSWLF. However, a significant amount plastic and other waste such as plastic bottles were observed on the surface of the soil. Mr. Lambert and Mr. Church explained that this waste had worked its way to the surface of the soil as a result of equipment traversing the inactive portions of the landfill to apply soil. **Therefore, within 5 days from the issuance of this audit report, Iredell County must cover all remaining exposed waste with a minimum of six inches of earthen material or remove the remaining exposed waste to the working face.**

**AREAS OF CONCERN AND COMMENTS**:

1. This inspection was a follow-up audit to evaluate efforts to comply with the Notice of Violation(s) issued on August 18, 2010. Please see the above comments for details

Operations Inspection of the MSW Landfill Unit:

2. Waste was being placed in Phase 4 at the time of inspection.
3. The active working face was small and compact.
4. No unacceptable waste streams were observed.
5. Windblown waste was managed at the time of inspection.
6. Missing edge of liner markers along the southern portion of the inactive Phase 3 had been reinstalled.
7. All mattresses observed on the southern portion of the MSWLF on August 10th and August 11th had been removed and properly disposed.
8. An inactive working face was observed east of the active working face during the inspection and was properly covered with Posi-Shell. Landfill staff began covering the inactive working face with soil during the inspection.

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

Charles T. Gerstell
Environmental Senior Specialist
*Regional Representative*

Phone: (704) 235-2144.

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| **Delivered on : 9/2/10 by** | | Hand delivery | X | Electronic Correspondence | | Certified No. |

cc: Mark Poindexter, Field Operations Branch Supervisor
Deb Aja, Western District Supervisor