

FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

| UNIT TYPE: | | | | | | | | | | | |
|-------------------|-------------------------------------|-----------------------|-------------------------------------|---------------|-------------------------------------|---------------------|-------------------------------------|---------|--|------|--|
| Closed CDLF | <input checked="" type="checkbox"/> | LCID | | YW | | Transfer | <input checked="" type="checkbox"/> | Compost | | SLAS | COUNTY: MADISON PERMIT NO.: 58-03 FILE TYPE: COMPLIANCE |
| Closed MSWLF | <input checked="" type="checkbox"/> | HHW | <input checked="" type="checkbox"/> | White goods | <input checked="" type="checkbox"/> | Incin | | T&P | | FIRM | |
| CDLF | <input checked="" type="checkbox"/> | Tire T&P / Collection | <input checked="" type="checkbox"/> | Tire Monofill | | Industrial Landfill | | DEMO | | SDTF | |

Date of Audit: 09/17/10, 03/25/10

Date of Last Site Inspection: 03/25/10

FACILITY NAME AND ADDRESS:

MADISON COUNTY SOLID WASTE FACILITY
 271 Craig Rudisill Road
 Marshall, NC 28753

GPS COORDINATES: N: 35.80890 E: -82.71680

FACILITY CONTACT NAME AND PHONE NUMBER:

Jim Huff, Madison County Solid Waste Director
 Telephone: 828-649-2311

AUDIT PARTICIPANTS:

Andrea Keller, DENR – Solid Waste Section
 Susan Wilson, DENR – DWQ (03/25/10)
 Starr Silvis, DENR – Division of LQ (03/25/10)
 Jim Huff, Madison Co. Solid Waste Director
 Cheryl Chandler, Madison Co. SW Dept.
 Larry Wright, Madison Co. SW Dept.

STATUS OF PERMIT:

C&DLF Unit 2 – PTO issued October 19, 2006
 Transfer Facility Permit Modification issued March 20, 2007
 MSWLF Unit – Closed
 C&DLF Unit 1 - Closed

PURPOSE OF AUDIT:

COMPREHENSIVE AUDIT

NOTICE OF VIOLATIONS:

NONE

AREAS OF CONCERN AND COMMENTS:

Transfer Station:

1. The waste is being transferred to the Lakeway Recycling and Sanitation Landfill, Lowland, TN/DEC Number SNL32-0280 and the service area for this facility is Madison County.
2. The Permit to Operate was on site and reviewed (03/20/07).

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3. Household Hazardous Waste area: All waste types labeled and contained/locked (10/05/09). No issues noted.
4. The waste screening records were reviewed. Unacceptable waste types are being noted on the screening forms and removed from the waste stream. Records reviewed: 07/15/09-03/25/10.
5. The transfer facility floors and drains were in good sanitary condition. The floor shows signs of wear/cracking and the facility should prepare for resurfacing the floor within the next year or two. The leachate collection tank was half full on 03/23/10.
6. It is recommended that the transfer trailer loading area walls be pressure washed on a six month schedule, or on an as needed basis depending on the waste streams and other factors that would affect the cleanliness of the facility.
7. Minimal wind blown litter was observed. Some windblown had collected on the back, tree-lined slope below the HHW collection area – operator notified during the 03/25/10 inspection. No windblown issues noted during the 09/17/10 inspection.
8. Training Records reviewed:

| Operator | Training Certification | Expiration Date |
|-----------------|-------------------------------|---------------------------|
| Douglas Payne | Transfer Station | 02/27/2012 |
| Larry Wright | Transfer Station | 08/14/2012 |
| Jerry Rector | Transfer Station | 02/27/2012 |
| Richard Roberts | Transfer Station | 08/21/2010 |
| Norman Roberts | Transfer Station | 01/01/2012 |
| James Ensley | Transfer Station | 07/22/2011 |
| Charles Metcalf | Transfer Station | 04/15/2011 |
| James Huff | Transfer Station/LF Manager | 08/14/2012 and 05/06/2011 |

9. Fire extinguishers were present. Ensure that they have met certification standards (annual checks).
10. Tire records were reviewed and in order (03/25/10). The tire storage area, the two trailer trucks backed up to the covered loading dock, was managed and all tires were under cover.
11. The oil filter, used oil, and antifreeze area was covered/controlled. See general note below regarding updating Operation Plans to include all on-site activities.
12. Waste tonnages were reviewed and in order (03/25/10). Waste average for July '09 through Feb '10 was 722 tons.

Active C&DLF (Unit 2):

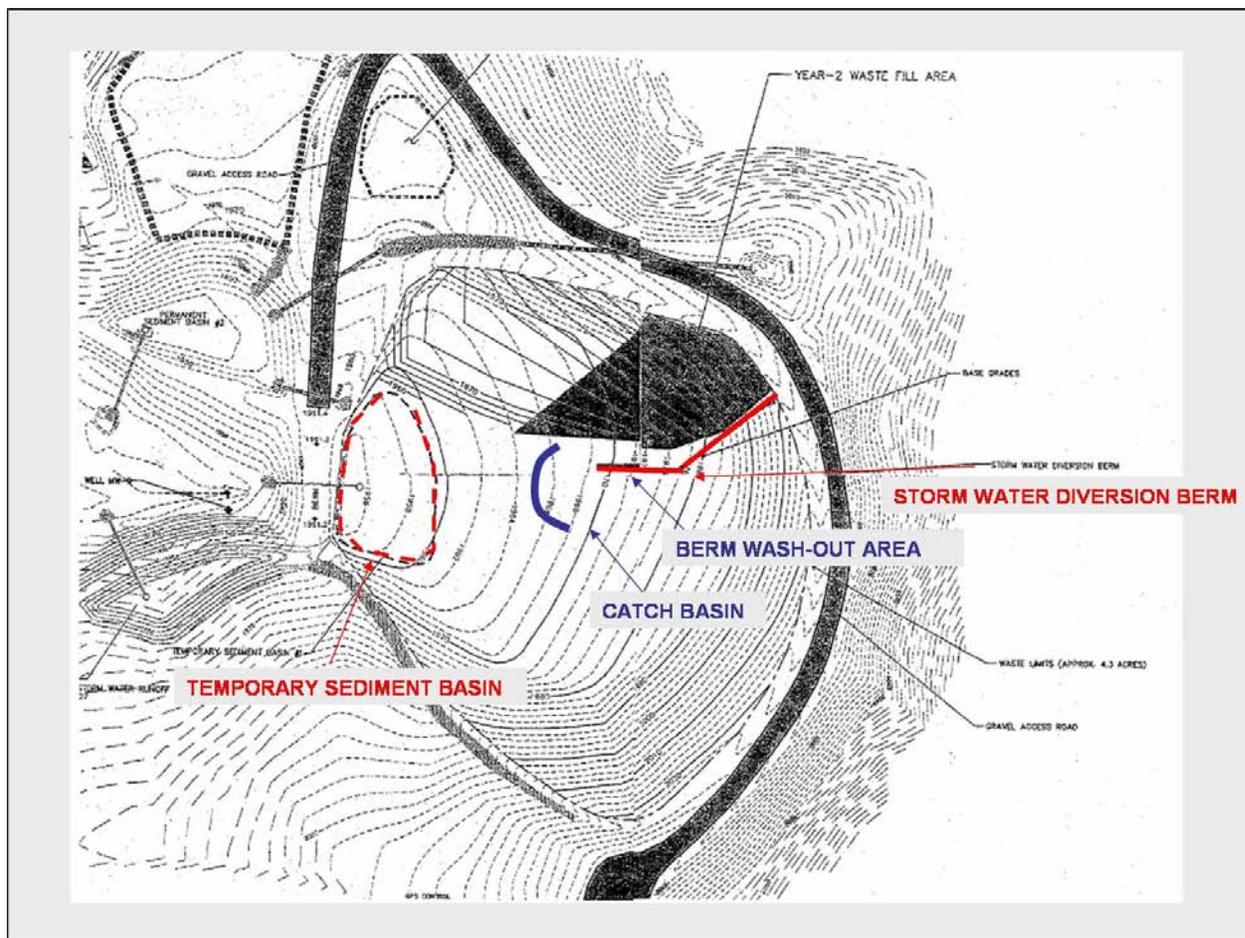
1. Minor windblown was noted at the C&DLF Unit 2 during the 03/25/10 inspection, primarily within the unused portion of unit 2. Minimal windblown noted during the 09/17/10 inspection.
2. The permitted edge-of-waste boundary stakes were maintained and visible.
3. The waste types disposed of in the C&D was reviewed and is according to permit. No unacceptable waste streams were noted.
4. The active working face of the C&DLF was kept to a controlled area, and the recently applied cover was adequate. The facility has been maintaining the areas of the C&DLF which were less recently active (toward

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the sediment basin region) which had experienced some erosion over the winter months. These areas require continual maintenance.

- The Operations Plan for the C&DLF Unit 2 (October 2006) and associated fill pattern figures located in the Permit to Operate (PTO) submittal indicate that the fill sequence at the landfill matches the "Year 2 Waste Fill Area" from Sheet FILL-2. Note that this figure and fill sequence is an approved document (*CQA Report and Operations Plan, C&DLF Unit 2, Madison County, NC*, prepared by McGill Associates October 12, 2006) per the approved permit. Note that the storm water diversion berm must be maintained at all times and that the temporary sediment basin must be protected from any leachate leaving the C&D disposal area.



- As indicated in the figure in item #5, the required storm water diversion berm had an area of wash-out during the site inspection of 03/25/10. During the 09/17/10 inspection, the berm appeared to be intact. As the temporary sediment basin discharges outside the permitted waste fill area of Unit 2, the facility must ensure stormwater contacting C&D waste (leachate) and leachate seeps from the active fill area do not reach the sediment basin. During the 09/17/10 inspection, leachate seeps were visible at the working face. This condition was discussed with the operator (L. Wright).

Closed MSWLF and Closed CDLF (Unit 1) (03/25/10)

- Adequate ground cover/vegetation was observed on the closed MSWLF cell and the closed CDLF cells. Continue to maintain adequate groundcover on all closed/inactive slopes. Vents and wells (landfill gas and groundwater) were visible, labeled, locked, and accessible.
- Edge of Waste (EOW) markers were in place. Facility is in the process of painting all EOW markers (orange)

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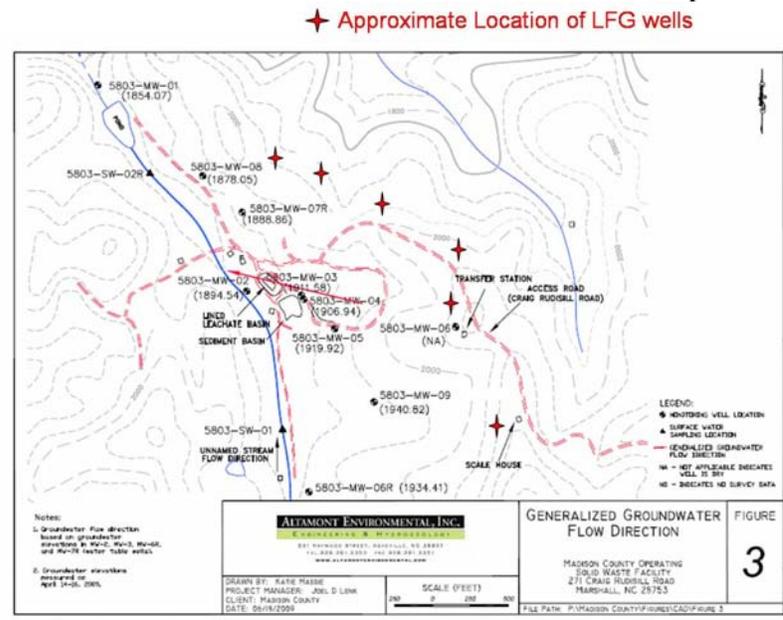
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for visibility.

3. The leachate pond was managed/maintained. Level of pond was approximately 1/2 full (during 03/25/10 and 09/17/10). Leachate is pumped and hauled for treatment/disposal.

General Comments:

1. **During the current permit modification for continued operation of the CDLF Unit 2, submit an updated Operation Plan which captures all site activities (tire collection, used oil collection, gun range, etc.).** (Submit Plan to Allen Gaither, SWS 828-296-4703)
2. Land Quality reviewed all permit files for the 58-03 location (03/25/10). Five open permits were reviewed. However, only one of the five LQ permits is considered active at this time (active Unit 2 CDLF). The permits to be considered inactive (soon to be closed) by LQ are for: the closed original Unit 1 CDLF, the closed Unit 1 CDLF Expansion, the Closed MSWLF, and an access road construction project.
3. Division of Water Quality reviewed the existing discharge permit (03/25/10). Stormwater basins DA-1 through DA-4 (corresponding to outfall sample locations OF-1 through OF-4) were viewed. No issues noted.
4. Groundwater monitoring wells were checked (MW-1, MW-2, MW-3, MW-4, MW-5, MW-6 (dry), MW-7R, MW-8, MW-9). The newly installed MW to replace MW-6 as a background well was not verified in this audit but will be inspected on future site visits. All wells were labeled, locked, accessible, and maintained. Groundwater records were available for review.
5. Landfill Gas Monitoring records were reviewed. Calibration is done at the facility and once-a-year by Altamont Environmental. LFG wells (six) were inspected (locked, no labels). An approved Landfill Gas Monitoring Plan was unavailable at the time of the audit, as well as a site map indicating LFG wells.



A random check of the LFG well nearest to MW-6 revealed the lack of a pvc cap on the well. **Please check all wells for proper caps** – this issue will be reviewed during a follow-up audit to the facility – **and have a copy of the approved LFG plan present for review.**

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



Phone: 828-296-4700.

Andrea Keller
Environmental Senior Specialist
Regional Representative

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| Mailed on : <u>09/23/10</u> by | | Hand delivery | | US Mail | | Certified No. [] |
|--------------------------------|--|---------------|--|----------------|--|-------------------|

cc: Mark Poindexter, Field Operations Branch Supervisor
Deb Aja, Western District Supervisor
Donald Herndon, Compliance Officer
Allen Gaither, Permit Engineer