



FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

UNIT TYPE:											
Lined MSWLF		LCID		YW		Transfer		Compost		SLAS	COUNTY: Wilkes PERMIT NO.: 97-03 FILE TYPE: COMPLIANCE
Closed MSWLF		HIIW		White goods		Incin		T&P		FIRM	
CDLF		Tire T&P / Collection		Tire Monofill		Industrial Landfill	X	DEMO		SDTF	

Date of Audit: April 30, 2009

Date of Last Audit: February 15, 2007

FACILITY NAME AND ADDRESS:

LP Building Products
 PO Box 98
 Roaring River, NC 28669

GPS COORDINATES: N: 36.2010 E: -80.0389

FACILITY CONTACT NAME AND PHONE NUMBER:

Billy Thompson, Jr., Plant Environmental Manager

w: 336-696-3410

c: 336-452-1674

FACILITY CONTACT ADDRESS:

PO Box 98
 Roaring River, NC 28669

AUDIT PARTICIPANTS:

John Patrone, NCDENR – Solid Waste Section (SWS)
 Billy Thompson, Jr., Plant Environmental Manager

STATUS OF PERMIT:

Permit To Operate (PTO) issued November 4, 2002
 PTO expired November 1, 2007

Landfill expansion application (from 5 to 7 acres) received by the SWS on July 17, 2007
 Addition of zinc borate sludge (to landfill), Division Approval letter dated November 15, 2007
 Modified permit application and additional information response received by the SWS on February 21, 2008
 Modified permit application and additional information response received by the SWS on May 20, 2008
 Landfill expansion modification review letter issued by the SWS on July 22, 2008
 Beneficial Use of Ash – EPA Ore Knob Site, SWS approval letter dated April 13, 2009

PURPOSE OF AUDIT:

Comprehensive Audit

FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

Page 2 of 3

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:

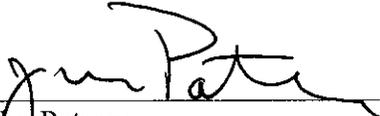
On April 30, 2009, John Patrone met with Billy Thompson to conduct a comprehensive audit of the LP Building Products ash landfill in Roaring River, Wilkes County.

1. The LP Building Products wood (fly) ash landfill is located adjacent to the facility's manufacturing processes. The facility is no longer known as ABTco, a LP Company but is referred to as LP Building Products. The manufacturing process and ash landfill were not in operation during the inspection.
2. LP Building Products chips hardwoods and pine logs. The chipped material is piled on-site and sold to paper manufacturers (due to the "high-end" chip material). LP Building Products purchases a "low-end" mixed-wood chip from sawmills and collects the bark from its de-barking process (associated with the high-end wood chips) and stores them in silos. LP Building Products has three boilers, two of which operate on wood waste. One boiler can burn No. 2 fuel oil and bark and the other can burn bark and wood dust. LP Building Products primarily manufactures hardboard (construction) siding.
3. The facility (ash landfill) began operation in 1981.
4. The facility site plan and operations plan were verified.
5. The facility is permitted to accept ash from the LP building products manufacturing processes. And has been given permission (by SWS) to accept zinc borate sludge, a byproduct of the manufacturing process. The zinc borate sludge is mixed with ash, by front end loader, and is required to be maximum 3:1 ratio sludge to ash with an average of 2:1 ratio sludge to ash.
6. Ash received at the landfill is quenched by sprinkler, mixed with zinc borate sludge, spread-out, and compacted.
7. The facility is not required to apply daily or routine soil cover. One-foot of soil cover is required in areas which will not have additional waste placed for 12-months or more.
8. Semi-annual ground water monitoring records were verified. Facility records were verified for ground water tests conducted on 02/13/07, 08/07/07, 02/20/08, 08/12/08, and 02/09/09.
9. Erosion and sedimentation controls appear to be in good order. Slope grade and ground cover appeared adequate. No evidence of runoff or erosion was detected.
10. The facility is required to maintain a record of the amount of solid waste (ash) received, compiled monthly. Monthly records were verified for 2008 through March 2009. At normal operation, LP Building Products receives ~ 1,000,000 lbs (~500 tons) of ash/month and ~ 600,000 lbs (~ 300 tons) of zinc borate sludge/month. Mr. Thompson stated that a cubic yard of (wood) ash is ~ 1,100 lbs.
11. Mr. Thompson was told to ensure that all slopes of the landfill are routinely mowed.
12. The facility has been given permission (by the SWS) to provide ash as beneficial use for the EPA – Ore Knob (environmental mitigation) Site. Mr. Thompson stated that no ash has been removed from the landfill to-date and that he understands that he is required to maintain records of the amount of ash removed and that after 12-months he must request an extension.

FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

Page 3 of 3

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


John Patrone
Environmental Senior Specialist
Regional Representative

Phone: 336-771-5095 Fax: 336-771-4631

Delivered on : <u>May 6, 2009</u> by		Hand delivery	<input checked="" type="checkbox"/>	US Mail		Certified No. []
--------------------------------------	--	---------------	-------------------------------------	---------	--	-------------------

cc: Mark Poindexter, Field Operations Branch Supervisor
Jason Watkins, Central Regional Supervisor
Donald Herndon, Compliance Officer
Allen Gaither, Environmental Engineer