



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		HHW		White goods		Incineration		T&P		FIRM	
CDFL		Tire T&P / Collection		Tire Monofill		Industrial Landfill	X	DEMO		SDTF	

Date of Audit: October 8, 2009

Date of Last Audit: April 30, 2009

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
 f: 336-696-3443
 billy.thompson@lpcorp.com

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
 Roger Latterell, Engineering Manager

STATUS OF PERMIT:

Permit To Operate (PTO) issued November 4, 2002
 PTO was scheduled to expire November 1, 2007
 PTO renewal is currently under review by the SWS
 Zinc borate sludge waste acceptance in landfill, SWS approval letter dated November 15, 2007
 Beneficial Use of Ash – EPA Ore Knob Site, SWS approval letter dated April 13, 2009

PURPOSE OF AUDIT:

Comprehensive 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.

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STATUS OF PAST NOTED VIOLATIONS:

None

AREAS OF CONCERN AND COMMENTS:

On October 8, 2009, John Patrone met with Billy Thompson and Roger Latterell to conduct a comprehensive audit of the LP Building Products Industrial Solid Waste (ash) Landfill in Roaring River, Wilkes County.

1. LP Building Products wood ash landfill is located adjacent to the facility's manufacturing processes. The manufacturing process was in operation during the inspection however, the landfill was not.
2. LP Building Products purchases low-end mixed wood chip from chip facilities and contract haulers to burn in its boilers. The low-end mixed wood chip is stored outside and ground prior to burning. LP Building Products chips hardwood and pine logs. This high-end chipped wood is sold to paper manufacturers and the bark, from its debarking process, is sold as bark chip. The high-end chipped wood is stored in silos.
3. LP Building Products has three boilers, two of which operate on wood waste and No. 6 fuel oil (boiler Nos. 2 and 3) and one boiler that burns No. 6 fuel oil only (boiler No. 1). LP Building Products manufactures hardboard (construction) siding.
4. The facility (industrial ash landfill) began operation in 1981.
5. The facility site plan was reviewed and its operations plan verified.
6. The facility is permitted to accept wood ash from the LP Building Products' wood-fired boilers. And has been given permission (by SWS) to accept zinc borate sludge, a byproduct of the manufacturing process used as an anti-mildew and termiticide, which is collected via its wastewater treatment plant and dried prior to disposal. The zinc borate sludge is mixed with ash, by front end loader, and is required to be mixed per maximum 3:1 ratio sludge to ash with an average of 2:1 ratio sludge to ash.
7. Ash received at the landfill is quenched by sprinkler and left to cool then mixed with zinc borate sludge, spread-out, and compacted.
8. The facility is not required to apply daily cover. One-foot of soil cover is required in areas which will not have additional waste placed for 12-months or more.
9. 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. Mr. Thompson stated that the facility will do its next ground water samples in November 2009.
10. Erosion and sedimentation controls appeared to be in good order. Slope grade and ground cover appeared adequate. However, a small area of the slope adjacent to the working face has eroded. Mr. Thompson stated that heavy rain may have contributed to the erosion and that it will be repaired immediately.
11. The facility is required to maintain a record of the amount of solid waste received, compiled monthly. Monthly records were verified for April through September 2009. During this time period, LP Building Products received 3,479,768 lbs of ash and 3,710,850 lbs of zinc borate sludge.
12. As per the Facility Annual Report, from July 1, 2008 through June 30, 2009, the facility received 5,035.51 tons of ash and zinc borate sludge.
13. Mr. Thompson was told to ensure that all slopes of the landfill are routinely mowed.
14. Mr. Thompson was told to ensure that monitoring wells are accessible by four-wheel drive vehicle.
15. 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 ash has been removed from the landfill during September 2009. To-date, 534,420 lbs has been removed by Dobson Trucking, Inc. which is a sub-contractor for Environmental Restoration Company, Inc. which is contracted by the EPA to conduct the mitigation operation.
16. Mr. Thompson understands that he is required to maintain records of the amount of ash removed and that after 12-months he must request an extension of the ash removal program.

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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>October 12, 2009</u> by		Hand delivery	<input checked="" type="checkbox"/>	US Mail		Certified No. []
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cc: Mark Poindexter, Field Operations Branch Supervisor
Jason Watkins, Central Regional Supervisor
Donald Herndon, Compliance Officer
Allen Gaither, Environmental Engineer