revised 4/13/2010 10:38:00 AM

FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

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

Date of Audit: April 9, 2010 **Date of Last Audit:** October 8, 2009

FACILITY NAME AND ADDRESS:
Louisiana-Pacific Corporation
Industrial Ash Landfill
PO Box 98
Roaring River, NC 28669

GPS COORDINATES: **N**: 36.2010 **E**: -80.0389

FACILITY CONTACT NAME AND PHONE NUMBER:
Billy M. Thompson, Jr., Plant Environmental Manager
w. 336-696-3410
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f. 336-696-3443
Billy.Thompson@LPCorp.com

FACILITY CONTACT ADDRESS:
Louisiana-Pacific Corporation
Billy Thompson, Plant Environmental Manager
PO Box 98
Roaring River, NC 28669

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

STATUS OF PERMIT:
Permit To Operate (PTO) existing landfill issued December 28, 2009
Permit To Construct (PTC) horizontal expansion issued in conjunction with PTO
PTO expires December 28, 2014

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.

STATUS OF PAST NOTED VIOLATION(S):
None

AREAS OF CONCERN AND COMMENTS:
On April 9, 2010, John Patrone met with Billy Thompson to conduct a comprehensive audit of the Louisiana-Pacific Corporation Industrial Solid Waste (ash) Landfill in Roaring River, Wilkes County.

1. Louisiana-Pacific Corporation manufactures hardboard (construction) siding and operates a wood ash landfill located adjacent to the manufacturing facility. The manufacturing process was in operation during the inspection however, the landfill was not.
2. The facility purchases low-end mixed wood chip from chip facilities and contract haulers to burn in boilers used to provide steam/power for the manufacturing process. Louisiana-Pacific Corporation 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).
3. Low-end mixed wood chip is stored outside and reground prior to burning. The facility also chips hardwood and pine logs. The high-end chipped wood is sold to paper manufacturers and the bark, from its de-barking process, is sold as bark chip. The high-end chipped wood is stored in silos.
4. The facility site plan and operations plan were discussed.
5. Construction of the horizontal expansion of the landfill has begun. Mr. Thompson was reminded that prior to waste acceptance a PTO for the newly constructed horizontal expansion must be obtained, Construction Quality Assurance (CQA) documentation and certification by the project engineer regarding landfill construction must be submitted, SWS personnel must be contacted for a pre-operative meeting, the edge of waste footprint must be identified with permanent markers, the permit activity fee paid, and financial assurance approved.
6. The facility is permitted to accept wood ash from its wood-fired boilers.
7. Louisiana-Pacific Corporation 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 in the facility's wastewater treatment plant and dried prior to disposal. The zinc borate sludge is mixed with ash, at the landfill, by front end loader. The ash to sludge ratio is required to be an average of 2:1 with a maximum 3:1.
8. The facility has a contractor operate the landfill. Hot ash is quenched by sprinkler and left to cool then mixed with zinc borate sludge and consolidated into small mounds. The mounds are then spread and compacted. The facility should ensure that the mounds are frequently spread, compacted, and graded.
9. 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.
10. The facility conducts in-house training for its personnel regarding wood ash and zinc borate sludge. It is suggested that the in-house training include contractor personnel and be expanded to include specific landfill operations.
11. Semi-annual groundwater and surface water monitoring records were verified. Facility records were verified for groundwater and surface water tests conducted on 10/13/09 and 02/23/10. <u>Semi-annual groundwater and surface water monitoring results shall be mailed to SWS c/o Ervin Lane, Compliance Hydrogeologist (919-508-8516). Ensure that groundwater and surface water is sampled for all Appendix I constituents.</u>
12. Areas of the landfill that have a cap appeared to be in good condition and are mowed twice a year.
13. Erosion and sedimentation controls appeared to be in good order. The facility repaired the area of side slope that had eroded due to heavy rain.
14. The facility is required to maintain a record of the amount of solid waste received, compiled monthly. Monthly records were verified for October 2009 through March 2010. Louisiana-Pacific Corporation received 1,874.98 tons of wood ash and 2,600.45 tons of zinc borate sludge.
15. Facility throughput for wood ash and zinc borate sludge for July 1, 2008 through June 30, 2009 is 5,035.51 tons.
16. Monitoring wells were observed and are accessible by four-wheel drive vehicle.
17. The facility has been given permission (by the SWS) to provide ash for beneficial use for the EPA – Ore Knob Environmental Mitigation Site. Ash is removed from the landfill by Dobson Trucking, Inc. which is a sub-contractor for the Environmental Restoration Company, Inc.

The Environmental Restoration Company is contracted by the EPA to conduct the mitigation operation. The amount of ash hauled-off from the landfill (09/10/09 through 01/05/10) is 552 tons, constituting 42 truckloads.

18. The facility is required to maintain records of the amount of ash removed from the landfill and must request an extension of the beneficial use of ash from SWS every 12-months. The most recent request was approved by SWS via letter dated 04/07/10.
19. Mr. Thompson stated that edge of waste markers will be installed by June 1, 2010. Mr. Thompson was asked to develop a statement or illustration that documents the distance of markers from edge of waste.
20. The site is secured by a gate and entrance granted via scale house.

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

John Patrone
Environmental Senior Specialist
Regional Representative

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Delivered on : April 13, 2010 **by**		Hand delivery	**X**	US Mail		Certified No. [ ]

cc: Mark Poindexter, Field Operations Branch Supervisor
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Ervin Land, Compliance Hydrogeologist
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