



FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

UNIT TYPE: (check all that apply to this audit with same Permit number)

Lined MSWLF	<input checked="" type="checkbox"/>	LCID		YW		Transfer		Compost		SLAS		COUNTY: Wilkes PERMIT NO.: 97-04 FILE TYPE: COMPLIANCE
Closed MSWLF		HHW		White goods	<input checked="" type="checkbox"/>	Incin		T&P		FIRM		
CDLF		Tire T&P / Collection	<input checked="" type="checkbox"/>	Tire Monofill		Industrial Landfill		DEMO		SDTF		

Date of Audit: 4-17-07

Date of Last Audit: 3-1-07

GPS COORDINATES: (Decimal Degrees) **N:** 36.20761 **W:** 80.98981

FACILITY NAME AND ADDRESS:

Wilkes County MSWLF
 NC Highway 268 East
 Roaring River, NC 28669

FACILITY CONTACT NAME AND PHONE NUMBER:

Thomas D. Livingston, Director-Solid Waste
 (336) 696-3867

FACILITY CONTACT ADDRESS (IF DIFFERENT):

Department of Solid Waste
 P.O. Box 389
 9219 Elkin Highway
 Roaring River, NC 28669

AUDIT PARTICIPANTS:

Jason Watkins, NCDENR-Solid Waste Section
 Deborah Aja, NCDENR-Solid Waste Section
 Mark Poindexter, NCDENR-Solid Waste Section
 Amy Annechino, NCDENR-Solid Waste Section
 Ervin Lane, NCDENR-Solid Waste Section
 Tommy Livingston, Director- Wilkes County Solid Waste
 Phil Greene, Landfill Supervisor
 Melissa White, Office Manager

STATUS OF PERMIT:

Permit to Operate Phase II expired April 20, 2005
 Permit to construct Phase III was issued on June 17, 2005
 Permit to Operate Phase III was issued June 30, 2006

PURPOSE OF AUDIT:

Comprehensive Facility Audit

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NOTICE OF VIOLATION(S) (citation and explanation):

1. 15A NCAC 13B .1626(11)(c) states “Appropriate methods such as fencing and diking shall be provided within the area to confine solid waste subject to be blown by the wind. At the conclusion of each day of operation, all windblown material resulting from the operation shall be collected and returned to the area by the owner or operator.”

As discussed on site, this facility must develop and implement a plan, whether it consists of a single fence or multiple fences, change in operational strategies, etc. to prevent further episodes of the amount of windblown material that had occurred prior to and was occurring during the audit.

It is essential that as much material as physically and/or mechanically possible be collected and returned to the working face for disposal.

You are hereby advised that, pursuant to N.C.G.S. 130A-22, an administrative penalty of up to \$5,000 per day may be assessed for each violation of the Solid Waste Statute or Regulations. If the violation(s) noted here continue, 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 (List all noted last audit):

1. 15A NCAC 13B .1626(2)(a) states that “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.”

Cover on the top of phase 2 and on the slope leading into phase 3 was much better. The daily cover in phase 3 is better but needs work. At no time, should waste be visible except on the working face for that particular day.

2. 15A NCAC 13B .1626(11)(c) states “Appropriate methods such as fencing and diking shall be provided within the area to confine solid waste subject to be blown by the wind. At the conclusion of each day of operation, all windblown material resulting from the operation shall be collected and returned to the area by the owner or operator.”

Material that has been caught in trees has not been retrieved.

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AREAS OF CONCERN AND COMMENTS:

1. This audit was conducted as part of the Comprehensive Facility Audit program. The permit, monitoring records, and operations plans were reviewed.
2. Wilkes County MSW Landfill is permitted to accept waste from Wilkes County only.
3. Facility received around 2 inches of rain and has sustained high winds over the last 2 days leading up to the audit inspection.
4. The facility averages around 175-200 tons of waste per day.
5. Operations are currently on-going in Phase 3, however permitted airspace in Phase 2 still exists and operations will shift to completing phase 2 in the near future.
6. The certified personnel at this facility are:
 - Tommy Livingston – MOLO – expires 2008**
 - Phil Greene – Landfill Ops Spec – expires August 2007**
 - Randy Johnson - Landfill Ops Spec – expires February 2009**
 - Olen Nester – Landfill Ops Spec – expires February 2009**
7. The facility's financial assurance test was granted approval on February 15, 2007.
8. The on-site convenience center, as well as the tire and white goods area, was clean and well maintained.
9. Ensure that both groundwater and methane monitoring reports, dating back at least 2 years, are always available on-site for review. Records for methane monitoring for 1st and 2nd Quarter of 2006 were not on site.
10. There were no groundwater or methane level exceedances in the records that were reviewed.
11. Groundwater monitoring well # 5, 7, 8, 10, and both wells labeled 12 were not properly tagged and labeled. Well # 8 was not locked.
12. An up-to-date site map showing all existing wells needs to be maintained on site at all times.
13. Ensure that all scrap tire certification forms are properly completed. Several of those reviewed lacked signatures.
14. The White Goods Management plan for this facility is being followed properly. All records for Freon extraction are well maintained as is all equipment used for this program. Currently the facility utilizes a split gravel and concrete pad to process materials after they are removed from the open top container at the on-site convenience center. Facility should consider moving to a full concrete area to cut down on cost of maintenance of gravel area due to heavy equipment usage.
15. The edge of liner markers in Phase 3 were well marked.
16. Changes to the leachate management plan need to be made including the location of sampling, maintenance of lines, and maintaining adequate freeboard in the leachate pond. All of these items should be addressed as part of a revised Operations plan.
17. The actual top of the liner of the leachate pond is not visible near the pump house. This area needs to be cleaned of any dirt or other debris so the edge of liner is visible in relation to the level of leachate in the pond.
18. The daily cover in phase 3 needs to be improved. At no time should waste be visible unless it is part of that particular day's working face. Adequate cover is a key component to managing windblown material.
19. There was a manhole that was missing its cover in the area adjacent to the leachate cleanout for Phase 3.

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20. Throughout the site, there are minor sediment and erosion control items that need to be addressed. They include maintenance of sediment ponds, repair of silt fence, and the providing of permanent groundcover of all slopes and other areas that are not part of the daily activities of the landfill.
21. Facility is planning to start grinding tires for disposal as a cost cutting measure. This activity does not necessarily require a treatment and processing permit, but it should be included, both in written and map form, in the revised Operations plan.
22. The grinding of pallets and other wood waste as discussed to meet the requirements of the future ban on pallets in MSW landfills will require a treatment and processing permit. This should be requested along with the submittal of the revised Operations plan.
23. The county recently approved a new Solid Waste Ordinance that will be submitted along with the revised Operations plan.
24. All permit (including operations plan) modification submittals should be made to Jim Coffey in the Asheville Regional Office, 2090 US Highway 70, Swannanoa, NC 28778. He can be reached at 828-296-4500.

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

_____ (signature) Phone: 336-771-5092
Jason M. Watkins
Regional Representative

Distribution: original signed copy to facility -- signed copy to compliance officer – e-mail or copy to super

Delivered on : <u>4-23-07</u> by		hand delivery	X	US Mail	X	Certified No. 7007 0220 0004 0732 6325
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- cc: Deb Aja, Western Region Supervisor
Mark Poindexter, Field Operations Supervisor
Amy Annechino, Compliance Officer
Ervin Lane, Field Operations Hydrogeologist
Jim Coffey, Permit Engineer
Gary Page, Wilkes County Manager