



FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

UNIT TYPE:											
Lined MSWLF		LCID		YW		Transfer		Compost		SLAS	COUNTY: Guilford PERMIT NO.: 41-16 FILE TYPE: COMPLIANCE
Closed MSWLF		HHW		White goods		Incineration		T&P	<input checked="" type="checkbox"/>	FIRM	
CDLF	<input checked="" type="checkbox"/>	Tire T&P / Collection		Tire Monofill		Industrial Landfill		DEMO		SDTF	

Date of Audit: 01/28/09

Date of Last Audit: 04/30/08

FACILITY NAME AND ADDRESS:

WCA of High Point, LLC
 5830 Riverdale Drive
 Jamestown, N.C. 27282

GPS COORDINATES: N: 35.95144 E: 79.92173

FACILITY CONTACT NAME AND PHONE NUMBER:

Mike McFeeley, General Manager
 Office: 336-886-3560
 Mobile: 336-669-2086
 e-mail: mmcfeeley@wcamerica.com

FACILITY CONTACT ADDRESS:

Same

AUDIT PARTICIPANTS:

Mike McFeeley, WCA of High Point
 Angela Smith, WCA of High Point
 Hugh Jernigan, N.C. Solid Waste Section
 Lee Hill, Guilford County Environmental Inspections

STATUS OF PERMIT:

Permit to Construct (Reclamation Pad): March 13, 2003
 Permit to Construct (Phase 1 Construction and Demolition Landfill): May 14, 2003
 Permit to Operate (Phase 1 Cell A C&D Landfill and Reclamation Pad): February 10, 2004
 Permit to Operate (Operational Plans, Service Area Change, Cells 2&3 C&D Landfill): December 9, 2004
 Permit to Operate (Ownership Change, Cells 4&5): December 28, 2007
 Permit Expiration Date: **February 10, 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:

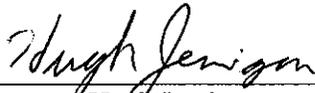
1. The facility consists of a Construction & Demolition Waste Treatment & Processing Operation and a Construction & Demolition Landfill.
2. The facility began operations on February 15, 2004.
3. Service area for the facility is Guilford, Davidson, Forsyth, and Randolph Counties.
4. Franchise agreement with the City of High Point, including name change clarification, is current with an effective date of December 12, 2006.
5. Reviewed Permit and Operational Plans for the facility.
6. The facility has submitted closure/post closure plan and financial responsibility requirements in accordance with 15A NCAC 13B .0547, which was required to be submitted to the Solid Waste Section by July 1, 2008. The submittal has been approved by the Solid Waste Section.
7. The facility has submitted an application for construction of the 12.5 acre Phase 2 area (May 2008). Revisions to the facility plan were submitted August 2008, revisions to the operational plans were submitted September 2008 and a response to comments letter has been submitted to the Solid Waste Section. The Permit to Construct permit application and revisions for Phase 2 has been reviewed by Solid Waste Permitting and the issuance of a permit is expected shortly. The facility has approximately 6-8 months space remaining in the Phase 1 area at current disposal rates.
8. The facility is also preparing an application for a Storm Water Permit to be submitted to the Water Quality, Surface Water Protection Branch.
9. Reviewed operational records for the facility including tonnage reports (incoming and outgoing materials from the reclamation operations, landfill disposal).
10. The facility receives approximately 300-325 tons per day. Reviewed of tonnage reports. Totals of incoming and outgoing materials for the past three months were as follows: October 2008 - 9389 tons incoming, 3961 tons outgoing; November 2008 - 5259 tons incoming, 1997 tons outgoing; December 2008 - 6687 tons incoming, 746 tons outgoing. Most prevalent outgoing materials from the treatment and processing operations consist of crushed concrete, mulch, wood chips for boiler fuels, metals and cardboard.
11. Reviewed training/operator certification records. The landfill operator certifications on file: Mike McFeeley- Certified Landfill Manager, expiration 02/22/11; James Swaney- Landfill Operators Certification, expiration 10/08/10; Clyde Herrin- Landfill Operators Certification, expiration 10/08/10; Joe Richardson- Landfill Operators Certification, expiration 10/08/10; Andy Tucker- Landfill Operators Certification, expiration 02/28/09.
12. Reviewed the random inspection program, contingency plans, and random inspection reports.
13. The facility typically conducts random inspections at both the landfill and treatment and processing operation locations. Currently all incoming waste is taken to the treatment and processing area (excepting incoming loads consisting exclusively of non-recyclable materials such as roofing shingles) and there is no direct haul to the landfill for incoming waste. One random inspection per day is being conducted at the treatment and processing pad.
14. The facility also maintains "Load Refusal Records" for incoming loads of waste, which were turned away from the site. Reviewed recent load refusal records.
15. Reviewed the most recent groundwater/surface water semiannual monitoring report on file for the sampling event conducted July 17-18 2008. The last groundwater/surface water semiannual monitoring event occurred January 15-16, 2009
16. Reviewed methane monitoring program. Five methane monitoring wells, scale house, break room, and maintenance area are being monitored. The last quarterly methane monitoring event occurred on January 15, 2009 and no measurable amounts of methane were detected.

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17. Observed Construction and Demolition landfill operations.
18. Currently operating in the Phase 1, Cell 5 area.
19. Windblown materials effectively controlled and collected.
20. Working face observed to be small, well controlled, and well compacted.
21. Excellent soil cover observed from recent daily operations. Fines generated by the treatment and processing operations are utilized as initial cover prior to application of soil cover. Intermediate soil cover and seeding has been conducted on landfill areas not currently being utilized.
22. Erosion control measures and sedimentation basins well maintained, no off-site erosion noted.
23. Facility staff periodically inspects side slopes for weak areas and potential leachate seeps. Repairs on the side slopes on the south facing area of the landfill have been conducted since the last inspection of the facility.
24. Roadways well maintained throughout the facility.
25. Monitoring wells observed to be locked and accessible.
26. Observed Treatment and Processing operations.
27. Amount of waste to be processed on the incoming waste tipping pad was observed to be well controlled and amount of waste on the tipping pad equated to approximately 1-2 hours of processing. The facility has fabricated a tarping system to cover waste and the end of the operating day Note: Permit Condition #28 requires " Only an amount of waste sufficient to begin sorting operations the next day may be left on the tipping pad" and all waste on the tipping pad must be covered by a tarp at the end of the day
28. The picking line was in operation during part of the inspection. Reclaimed materials were being sorted to stockpiles during the inspection.
29. Waste and fines generated by the treatment and processing operations were being hauled to the landfill during the inspection
30. Materials are being sorted, processed, and stored as per approved operational plans.
31. A dumpster is located at the reclamation pad and on the landfill for disposal of any incidental unacceptable materials found in incoming loads.
32. Windblown materials effectively controlled by utilization of fences at the treatment and processing area, no fugitive dust problems were observed.
33. Observed incoming loads of waste. All incoming waste appeared to be consistent with requirements of the permit

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



 Hugh Jernigan

Phone: 336-771-5093

Environmental Senior Specialist
Regional Representative

Delivered on : <u>01/29/09</u> by	X	e-mail		US Mail		Certified No. []
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- cc: Mark Poindexter, Field Operations Branch Supervisor
 Jason Watkins, Central District Supervisor
 Donald Herndon, Compliance Officer
 Lee Hill, Guilford County Environmental Inspection
 Pat Backus, Solid Waste Permitting