



# 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		Incin		T&P	<input checked="" type="checkbox"/>	FIRM		
CDFL	<input checked="" type="checkbox"/>	Tire T&P / Collection		Tire Monofill		Industrial Landfill		DEMO		SDTF		

**Date of Audit:** 05/20/10**Date of Last Audit:** 07/15/09**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:**

John Walker, General Manager  
 Office: 336-886-3560  
 Mobile: 336-669-2086  
 e-mail: jawalker@wcamerica.com

**FACILITY CONTACT ADDRESS:**

Same

**AUDIT PARTICIPANTS:**

John Walker, WCA of High Point  
 Angela Smith, WCA of High Point  
 Hugh Jernigan, N.C. Solid Waste Section

**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 to Operate (Phase 1; Cells 1,2,3,4,5 C&DLF and Reclamation Pad) Issued: February 20, 2009  
 Permit to Construct (Phase 2 Landfill) Issued: February 20, 2009  
 Permit Expiration Date: **February 14, 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.

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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 is currently being revised, including a change in service area.
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
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. Reviewed operational records for the facility including tonnage reports (inbound and outbound materials from the landfill and reclamation operations). The facility receives approximately 300 tons per day. Reviewed inbound/outbound tonnage reports . Totals of incoming and outgoing materials for March and April 2010 were 11,533.6 tons (inbound)and 3,698.16 tons (outbound). Most prevalent outgoing materials from the treatment and processing operations consist of crushed concrete and shingles.
9. Reviewed training/operator certification records. The landfill operator certifications on file: John Walker- Certified Landfill Manager, expiration 03/08/13; James Swaney- Landfill Operators Certification, expiration 10/08/10; Clyde Herrin- Landfill Operators Certification, expiration 08/13/13; Joe Richardson- Landfill Operators Certification, expiration 10/08/10; Andy Tucker- Landfill Operators Certification, expiration 04/14/12; Angela Smith- Landfill Operators Certification, expiration 04/14/12 .
10. Reviewed the random inspection program, contingency plans, and random inspection reports.
11. 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.
12. The facility also maintains "Load Refusal Records" for incoming loads of waste, which were turned away from the site. Reviewed recent load refusal records.
13. Reviewed the most recent groundwater/surface water semiannual monitoring report on file for the sampling event conducted January 4-5 2010.
14. 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 April 22, 2010 and no measurable amounts of methane were detected.
15. Observed Construction and Demolition landfill operations.
16. Currently operating in the Phase 1, Cell 5 area.
17. Windblown materials effectively controlled and collected.
18. Working face observed to be small, well controlled, and well compacted.
19. 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.

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20. Erosion control measures and sedimentation basins well maintained, no off-site erosion noted.
21. 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.
22. Roadways well maintained throughout the facility.
23. Monitoring wells observed to be locked and accessible.
24. Observed Treatment and Processing operations.
25. 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
26. The picking line was in operation during part of the inspection. Reclaimed materials were being sorted to stockpiles during the inspection.
27. Waste and fines generated by the treatment and processing operations were being hauled to the landfill during the inspection
28. Materials are being sorted, processed, and stored as per approved operational plans.
29. A dumpster is located at the reclamation pad and on the landfill for disposal of any incidental unacceptable materials found in incoming loads.
30. Windblown materials effectively controlled by utilization of fences at the treatment and processing area, no fugitive dust problems were observed.
31. 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.



Phone: 336-771-5093

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 Hugh Jernigan  
 Environmental Senior Specialist  
*Regional Representative*

Delivered on : <u>05/29/09</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