

# Division of Waste Management Solid Waste Section

UNIT T	YPE:						
Lined MSWLF	LCID	YW	Transfer	X	Compost	SLAS	COUNTY: Guilford
Closed MSWLF	HHW	White goods	Incin		T&P	FIRM	PERMIT NO.: 41-20
CDLF	Tire T&P / Collection	Tire Monofill	Industrial Landfill		DEMO	SDTF	FILE TYPE: COMPLIANCE

Date of Site Inspection: April 27, 2021

Date of Last Inspection: February 26, 2020

#### **FACILITY NAME AND ADDRESS:**

City of Greensboro Transfer Station 6310 Burnt Poplar Road Greensboro, NC 27409

#### **GPS COORDINATES:**

N: 36.07400 W: -79.92108

## **FACILITY CONTACT NAME AND PHONE NUMBER:**

Mark Hennis, Transfer Station Operations Supervisor - City of Greensboro Field Operations Department w. 336-373-3864

mark.hennis@greensboro-nc.gov

#### FACILITY CONTACT ADDRESS:

City of Greensboro Field Operations Department David Deel, Solid Waste Disposal Manager 2503 White Street Greensboro, NC 27405

#### **PARTICIPANTS:**

Chuck Kirchner, Environmental Senior Specialist - Solid Waste Section (SWS) Mark Hennis, Transfer Station Operations Supervisor - City of Greensboro Field Operations Department

#### STATUS OF PERMIT:

Permit To Operate (PTO) issued November 28, 2016

PTO expiration date: Life-of-Site

#### **PURPOSE OF SITE VISIT:**

Comprehensive Inspection

#### STATUS OF PAST NOTED VIOLATIONS:

None

#### **OBSERVED VIOLATIONS:**

A. 15A NCAC 13B .0203(d) states: "By receiving solid waste at a permitted facility, the permittee(s) shall be considered to have accepted the conditions of the permit and shall comply with the conditions of the permit." Permit to Operate – Part I, Number 6 states "Operation of this solid waste management facility shall be in accordance with the North Carolina Solid Waste Management Rules, 15A NCAC 13B; Article 9 of the Chapter 130A of the North Carolina General Statutes (N.C.G.S. 130A-290, et seq.); the conditions contained in this permit; and the approved plan. Should the approved plan and the rules conflict, the Solid Waste Management Rules shall take precedence unless specifically addressed by permit condition. Failure to comply may result in compliance action or permit revocation." Permit to Operate - Attachment 3, Part II, Number 8 states "All water that comes in contact with solid waste, including vehicle wash-down water, is leachate and must be captured and properly treated before release to the environment." Permit to Operate Operations Plan dated November 28, 2018 (DIN 27044) Section 4.2 states in part "Leaking trailers will

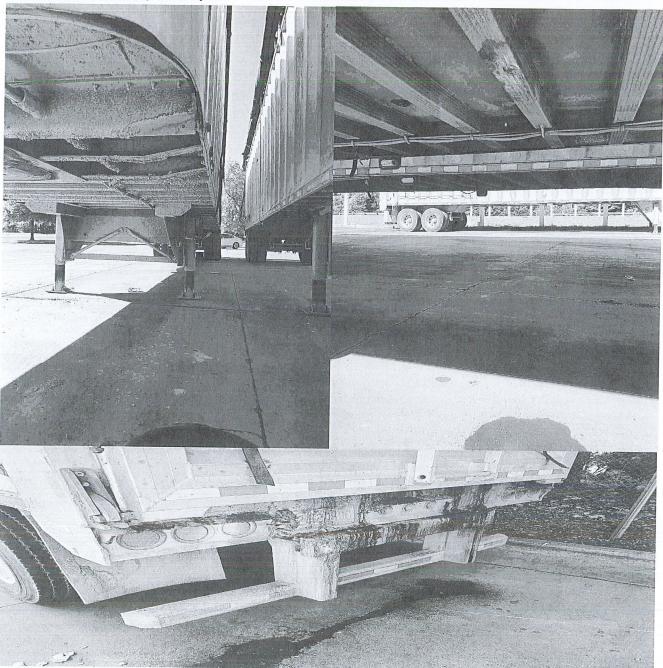


# Division of Waste Management Solid Waste Section

have drip pans placed beneath the trailer to contain leaks. Leachate, collected in the drip pans, is disposed through the sanitary sewer system."

The City of Greensboro is in violation of 15A NCAC 13B .0203(d) in that leachate was leaking from a transfer trailer onto the ground. There were no drip pans in place to capture the leachate leaking from the transfer trailers. Insufficient drip pans to capture leachate were observed on site.

To resolve this violation any leachate that is observed on site shall be collected in drip pans and disposed through the sanitary sewer system.



Photographs of Trailers 701-T & 706-T taken by Chuck Kirchner during the April 27, 2021 facility inspection.

# DE 3

# FACILITY COMPLIANCE INSPECTION REPORT

# Division of Waste Management Solid Waste Section

The item(s) listed above were observed by Section staff and require action on behalf of the facility in order to come into or maintain compliance with the Statutes, Rules, and/or other regulatory requirements applicable to this facility. Be 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 Laws, Regulations, Conditions of a Permit, or Order under Article 9 of Chapter 130A of the N.C. General Statutes. Further, the facility and/or all responsible parties may also 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.

#### **ADDITIONAL COMMENTS**

On April 27, 2021, Chuck Kirchner met with Mark Hennis to conduct a comprehensive inspection of the City of Greensboro Transfer Station on Burnt Poplar Road in Greensboro, Guilford County.

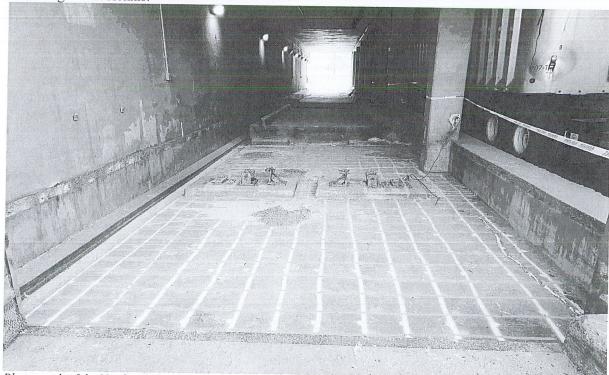
- 1. The facility is a municipal solid waste (MSW) transfer station owned by the City of Greensboro.
- 2. The facility is operated by City of Greensboro personnel.
- 3. Hilco Transport, Inc. hauls MSW from the transfer station to the disposal facility.
- 4. The facility is open Monday through Friday 6:00 am to 5:00 pm and Saturday 7:00 am to 1:00 pm. Reduced hours were performed during Covid Pandemic.
- 5. The facility permit, site plan, and operations plan were discussed.
- 6. The facility receives solid waste generated in Alamance, Caswell, Chatham, Davidson, Davie, Forsyth, Guilford, Montgomery, Randolph, Rockingham, and Stokes Counties.
- 7. The following are facility certified Transfer Station Operations Specialist personnel:
  - a. Mark Hennis, certification number TS-2018003, exp. 02/23/24
  - b. E. Ray Davis, certification number TS-2009146, exp. 06/16/24
  - c. Eric Rodgers, certification number TS-2018004, exp. 02/24/24
  - d. Andrew Picone, certification number TS-2019050, exp. 4/17/2022
  - e. Donald Kearns, certification number TS-2019046, exp. 4/17/2022
  - f. John Coldsnow, certification number TS-2019040, exp. 4/17/2022
  - g. Gregory Winstead, certification number TS-2019074, exp. 08/21/2022
  - h. Tracy Sidden, certification number TS-2020083, exp. 12/09/2023
  - i. Kenae Stokes, certification number TS-2020082, exp. 12/09/2023
  - j. Marvin Smith, certification number TS-2006092, exp. 12/09/2023
  - k. Sean Young, certification number TS-2015041, exp. 03/25/2024
- 8. The facility maintains records of the amount of MSW received. Records were observed for January 2021 through March 2021. The facility received 37,121.08 tons or an average of ~ 17,000 tons/month during this period.
- 9. Municipal solid waste is hauled to the Great Oak Landfill (76-07) in Randleman, Randolph County. Per the facility permit, the facility must haul solid waste to an MSW landfill permitted to accept the waste type and whose service area includes the origin of the solid waste.
- 10. If the facility or disposal landfill is not able to accept MSW, the operations plan states that solid waste may be hauled to the City of Greensboro MSW Landfill White Street Landfill (41-12) for disposal with approval from City of Greensboro City Councel and NCDEQ Solid Waste Section.
- 11. The facility annual report (FAR) was received by the SWS dated July 23, 2020. Tonnage received July 2019 through June 2020 was 207,733.39 tons. The MSW was hauled to Great Oak Landfill.
- 12. During the inspection, there were three empty transfer trailers on site, one transfer trailer in the open load out bay, one in line for the load out bay and seven tarped full transfer trailers. Full transfer trailers were being actively hauled off site.
- 13. Hilco Transport, Inc. had provided new transfer trailers to this facility at the start of the contract with the City of Greensboro in October of 2019. Mr. Hennis stated that Hilco Transport, Inc. had replaced the new transfer trailers with older models in the last year. City of Greensboro is responsible to make sure transfer trailers are properly maintained or removed from service.
- 14. Transfer trailers are commonly stored on site overnight and on weekends.



# Division of Waste Management Solid Waste Section

- 15. The facility is required to conduct a waste screening on approximately 1 percent of commercial and industrial loads received. Records from January 2020 through March 2021 were observed.
- 16. The facility tipping floor is starting to show wear.
- 17. The transfer station building appeared to be in good condition.
- 18. The facility has two load-out bays.

19. The bay on the north side is currently having the outbound transfer trailer scale replaced. Mr. Hennis stated that new scales should be able to be lifted using the 320 Backhoe/Tamper and a chain sling. Lifting the scale will enable City of Greensboro to clean out any solids that get under scales. Previously this was very difficult to do according to Mr. Hennis.



Photograph of the North side load out bay taken by Chuck Kirchner during the April 27, 2021 facility inspection.



Photograph of the North side load out bay leachate line taken by Chuck Kirchner during the April 27, 2021 facility inspection.

# Division of Waste Management Solid Waste Section

- 20. The facility operates two tamping machines. The tamping machines compact solid waste in the transfer trailers prior to the trailers being removed from the building. Only one tamping machine was being used since only one load out bay was open.
- 21. The transfer station building has a tipping floor leachate trench drain that runs along the truck egress bay (trucks enter through a side bay door, unload onto the tipping floor, and exit through a second [larger] bay door) and leachate drains located at the entrance and exit of the two load out bays (total of four drains) and along the scale area of each load out bay.
- 22. Positive drainage to the leachate system from the tipping floor is not as obvious from the transfer station floor. Mr. Hennis stated that the City of Greensboro has a plan to add an additional french drain at the east side door where trucks come in to dump on the tipping floor and is currently looking for contractors for this work. To ensure no leachate can leave the tipping floor area this french drain shall be installed or another means of ensuring positive drainage shall be provided on the east side of the transfer station building. All leachate from the tipping floor shall be directed to the leachate system as discussed in the field.
- 23. The leachate drains observed appeared operational.
- 24. The leachate settling tank/oil-water separator was pumped out by EVO Corporation on January 29, 2021. Mr. Hennis stated that the leachate settling tank/oil-water separator is pumped out ~ quarterly or more frequent if needed.
- 25. There are convenience recycling dumpsters kept by the resident drop off area. A City of Greensboro truck comes out weekly to empty glass dumpsters and daily for every morning for single stream recycling.
- 26. Leachate from the facility flows into a settling tank and discharges to the City of Greensboro sanitary sewer.
- 27. The facility has an off-load area adjoining the tipping floor for resident drop-off. The resident off-load area is an extension of the building and tipping floor. It is covered and adjacent to the tipping floor leachate trench drain.
- 28. Facility grounds were in good condition. Continue to ensure windblown material shall be collected by the end of each workday.
- 29. The facility operations plan states that recyclables may be temporarily managed on up to 50 percent of the tipping floor if the City's current recycling collection service is interrupted. Currently cardboard and glass are being accepted at the transfer station. Two dumpsters for cardboard and two residential recycling cans for glass.
- 30. The facility does not accept scrap tires or whitegoods. Any scrap tires or white goods are separated they are picked up by City of Greensboro to Bishop Road Recycling Center.
- 31. The City of Greensboro Fire Department can be contacted to address an emergency at the facility.
- 32. The facility is secured by a locked gate. Personnel are on site during operating hours.
- 33. The facility has signage.
- 34. Access roads are of all-weather construction.

Please contact me if you have any questions or of Digitally signed by Chuck Kirchner Date: 2021.04.30 10:37:53	concerns regarding this inspection report.
Date: 2021.04.30 10:37:53 -04'00'	Phone:336-776-9633
Chuck Kirchner Environmental Senior Specialist Regional Representative	

Sent on: April 30, 2021	Email	Hand delivery	US Mail	Certified No. [_]

Copies:

Deb Aja, Western District Supervisor - Solid Waste Section



# Division of Waste Management Solid Waste Section

<b>UNIT T</b>	YPE:			STEED STATE		P0200042033 (000000)	Part de	
Lined MSWLF	LCID	YW	Transfer	X	Compost	SLAS		COUNTY: Guilford
Closed MSWLF	HHW	White goods	Incin		T&P	FIRM		PERMIT NO.: 41-20
CDLF	Tire T&P / Collection	Tire Monofill	Industrial Landfill		DEMO	SDTF		FILE TYPE: COMPLIANCE

Date of Site Inspection: May 04, 2022

Date of Last Inspection: April 13, 2022

#### **FACILITY NAME AND ADDRESS:**

City of Greensboro Transfer Station 6310 Burnt Poplar Road Greensboro, NC 27409

#### **GPS COORDINATES:**

N: 36.07400 W: -79.92108

## **FACILITY CONTACT NAME AND PHONE NUMBER:**

Mark Hennis, Transfer Station Operations Supervisor - City of Greensboro Field Operations Department w. 336-373-3864

mark.hennis@greensboro-nc.gov

#### **FACILITY CONTACT ADDRESS:**

City of Greensboro Field Operations Department David Deel, Solid Waste Disposal Manager 2503 White Street Greensboro, NC 27405

#### **PARTICIPANTS:**

Chuck Kirchner, Environmental Senior Specialist - Solid Waste Section (SWS)

Mark Hennis, Transfer Station Operations Supervisor - City of Greensboro Field Operations Department (via email)

#### STATUS OF PERMIT:

Permit To Operate (PTO) issued November 28, 2016

PTO expiration date: Life-of-Site

#### **PURPOSE OF SITE VISIT:**

Comprehensive Inspection

#### **STATUS OF PAST NOTED VIOLATIONS:**

A. Resolved: 15A NCAC 13B .0203(d): Water that had come in contact with solid waste in transfer trailers and then leaked out onto the ground was not captured and properly treated before release to the environment.

#### **OBSERVED VIOLATIONS:**

None



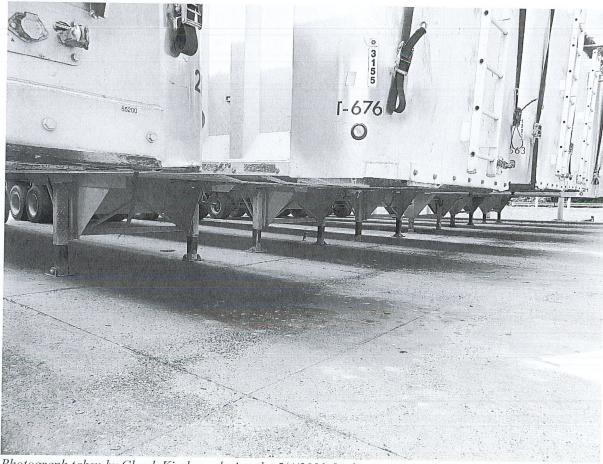
# Division of Waste Management Solid Waste Section

The item(s) listed above were observed by Section staff and require action on behalf of the facility in order to come into or maintain compliance with the Statutes, Rules, and/or other regulatory requirements applicable to this facility. Be 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 Laws, Regulations, Conditions of a Permit, or Order under Article 9 of Chapter 130A of the N.C. General Statutes. Further, the facility and/or all responsible parties may also 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.

#### **ADDITIONAL COMMENTS**

On May 04, 2022, Chuck Kirchner conducted a compliance inspection of the City of Greensboro Transfer Station on Burnt Poplar Road in Greensboro, Guilford County per the Notice of Deficiency issued to the city on April 22, 2022.

- 1. The Notice of Deficiency was issued for violations of 15A NCAC 13B .0203(d) & 15A NCAC 13B .0405(c) in that transfer trailers were not maintained to be leak resistant and water that had come in contact with solid waste in transfer trailers and then leaked out onto the ground was not captured and properly treated before release to the environment.
- 2. The transfer trailers and their staging areas were the focus of this inspection.
- 3. During the inspection there were eight full transfer trailers in the main staging area and one transfer trailer located near the entrance on the north side of the facility. In addition, there were two empty transfer trailers in the staging area and two transfer trailers in the loading bays.
- 4. Transfer trailers observed on site appeared to be well maintained. No leachate was observed leaking from the full transfer trailers.



Photograph taken by Chuck Kirchner during the 5/4/2022 facility inspection.



Division of Waste Management Solid Waste Section

5. There were several drip pans observed on site.



Photograph taken by Chuck Kirchner during the 5/4/2022 facility inspection.

- 6. Ensure any leachate leaking from trailers is captured with drip pans and properly treated before being released to the environment.
- 7. Mr. Hennis submitted "Daily Transfer Station Truck Staging Area Inspection" forms for review per NCDEQ request. Inspection forms from April 29, 2022 through May 8, 2022. No leaking trailers were recorded during that time.
- 8. The Transfer Station Assessment Report response dated April 13, 2022, from the NCDEQ Solid Waste Section Permitting Branch (Guilford. 4120T\_CORR\_20220413. TS Assessment Report DEQ Response) states: "Leachate seeped or released from waste-laden vehicles which parked at the vehicle staging area were observed and reported in the Facility Compliance Inspection Reports dated May 14, 2019 and April 27, 2021. The Section proposes to use dripping pans to collect leachate underneath the vehicle is NOT a permanent solution and violating the requirements of Rule 15A NCAC 13B .0405(c) which states "All vehicles and containers being used for the temporary storage of solid waste shall be maintained to be leak resistant in accordance with Rule .0105 of this Subchapter, or shall be stored so that any leachate from the vehicles or containers will be collected to prevent the release of leachate to the environment." Please provide Ming-Tai Chao, Permitting Engineer, with the requested information regarding leachate management at the facility.
- 9. Mr. Lovett with the City of Greensboro responded to the above correspondence via email on April 26, 2022 (Guilford. 4120T\_CORR\_20220426. City of Greensboro Response Letter) detailing some of the corrective measures the City of Greensboro is doing at this facility. Please continue to provide additional information as requested.



# Division of Waste Management Solid Waste Section

10. No windblown litter was observed this inspection.

11. This was a partial inspection and did not include an inspection of the inside of the transfer station.

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

Chuck

Digitally signed by Chuck Kirchner

Kirchner

Date: 2022.05.11 16:26:34

-04'00'

Phone: <u>336-776-9633</u>

Chuck Kirchner Environmental Senior Specialist *Regional Representative* 

|--|

Copies:

Deb Aja, Western District Supervisor - Solid Waste Section Ming-Tai Chao, Permitting Engineer - Solid Waste Section

Richard Lovett, Environmental Compliance Support Manager - City of Greensboro,

richard.lovett@greensboro-nc.gov

ROY COOPER

ELIZABETH S. BISER Secretary

MICHAEL SCOTT



April 22, 2022

CERTIFIED MAIL 7020 1810 0001 2074 5057 RETURN RECEIPT REQUESTED

City of Greensboro Transfer Station 6310 Burnt Poplar Road Greensboro, NC 27409

SUBJECT:

Notice of Deficiency

Compliance Inspection Report City of Greensboro Transfer Station

41-20T

**Guilford County** 

Dear Mr. Hennis:

On April 13, 2022, Chuck Kirchner, representing the State of North Carolina, Division of Waste Management Solid Waste Section (Section), inspected the above referenced facility for compliance with North Carolina solid waste statutes and rules. Mark Hennis was present and represented the City of Greensboro during this inspection. The following violations were noted:

- A. 15A NCAC 13B .0203(d)states: "By receiving solid waste at a permitted facility, the permittee(s) shall be considered to have accepted the conditions of the permit and shall comply with the conditions of the permit." Permit to Operate Part I, Number 6 states "Operation of this solid waste management facility shall be in accordance with the North Carolina Solid Waste Management Rules, 15A NCAC 13B; Article 9 of the Chapter 130A of the North Carolina General Statutes (N.C.G.S. 130A-290, et seq.); the conditions contained in this permit; and the approved plan. Should the approved plan and the rules conflict, the Solid Waste Management Rules shall take precedence unless specifically addressed by permit condition. Failure to comply may result in compliance action or permit revocation." Permit to Operate Attachment 3, Part II, Number 8 states "All water that comes in contact with solid waste, including vehicle wash-down water, is leachate and must be captured and properly treated before release to the environment." Permit to Operate Operations Plan dated November 28, 2018 (DIN 27044) Section 4.2 states in part "Leaking trailers will have drip pans placed beneath the trailer to contain leaks. Leachate, collected in the drip pans, is disposed through the sanitary sewer system."
- **B.** 15A NCAC 13B .0405(c) states: "All vehicles and containers being used for the temporary storage of solid waste shall be maintained to be leak resistant in accordance with Rule .0105 of this Subchapter, or shall be stored so that any leachate from the vehicles or containers will be collected to prevent the release of leachate to the environment."

On April 13, 2022, leachate was observed leaking from two transfer trailers onto the ground at the City of Greensboro Transfer Station. There were no drip pans in place to capture the leachate leaking from the transfer trailers. Any leachate that leaked out of the trailers was not captured or properly treated before being released to the environment. The vehicles were not maintained to be leak resistant or stored so that any leachate from the vehicles or containers were collected to prevent the release of leachate to the environment.



City of Greensboro Notice of Deficiency Page 2 of 2 April 22, 2022

The above violations may have or can compromise the facility's ability to ensure protection of the public health and the environment and thus require remedial action on behalf of the facility in order to maintain compliance with 15A NCAC 13B .0203(d) and 15A NCAC 13B .0405(c). Based upon the foregoing, the City of Greensboro shall come into compliance immediately with all requirements of the regulations in 15A NCAC 13B .0203(d) and 15A NCAC 13B .0405(c) by completing the following at the City of Greensboro Transfer Station:

- 1. Leachate must be captured or properly treated before being released to the environment.
- 2. Vehicles must be maintained to be leak resistant or stored so that any leachate from the vehicles or containers will be collected to prevent the release of leachate to the environment.

The violations listed above were observed by Section staff and require action on behalf of the facility in order to come into or maintain compliance with the Statutes, Rules, and/or other regulatory requirements applicable to this facility. Be 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 Laws, Regulations, Conditions of a Permit, or Order under Article 9 of Chapter 130A of the N.C. General Statutes. Further, the facility and/or all responsible parties may also 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.

Please keep me informed of your progress in this matter. Solid Waste Section staff will conduct a follow-up inspection to verify that the operator has completed the requirements of this Notice of Deficiency.

If you have any questions, please contact me at 336-776-9633 or e-mail Chuck.Kirchner@ncdenr.gov.

Sincerely,

Chuck Kirchner Kirchner

Digitally signed by Chuck Kirchner Date: 2022.04.22 13:11:30 -04'00'

Chuck Kirchner
Environmental Senior Specialist
Division of Waste Management - Solid Waste Section

copies: Jason Watkins, Field Operations Branch Head Deb Aja, Western District Supervisor Chris Hollinger, Compliance Officer





WATER RESOURCES

August 27, 2021

Richard Lovett The City of Greensboro 6310 Burnt Poplar Road Greensboro, NC 27401

RE: Inspection of Sand Filter

Dear Mr. Lovett:

On August 10, 2021, the City of Greensboro Stormwater Management Division conducted an inspection of the Stormwater Control Measures (SCMs) in your control or ownership located at 6310 Burnt Poplar Rd. State and local regulations require routine inspections of all structural Stormwater Control Measures to ensure the proper functioning of these structures. This inspection focused on key structural components, sediment capacity, and maintenance practices of the SCM(s).

The inspection found that the following item(s) are required to restore and/or enhance the effectiveness of the SCM(s) on your property. The City of Greensboro allows the following items to be completed within 90 days from the date of this letter prior to commencement of enforcement action. Please complete the items before November 29, 2021. Please contact me when the items have been completed, after which an additional inspection will occur.

## City of Greensboro Transfer Station [S0107]

- Remove all vegetation and debris from inside the sediment chamber.
- Remove all sediment that has accumulated in the sediment chamber and dispose of it in accordance with the City of Greensboro's policy. Restore this area to its original dimensions.
- Remove sediment that has accumulated in the inlet(s).
- Remove vegetation and other debris from the top of the filter bed and restore this area to its original dimensions. After vegetation and debris is removed, use a hand rake to loosen up the top layer of the sand to promote filtration and replenish the area with sand as needed.

Proper operation and routine maintenance are a vital part of ensuring the effectiveness of your SCM(s) and is the sole responsibility of the owner. The City of Greensboro accepts no liability in the event of failure of the SCM(s). If you should have any questions or comments concerning the required items or the time frame, please feel free to contact me at (336) 373-7665, or at Blake.Strumbel@greensboro-nc.gov.

Sincerely,

Blake Strumbel,

BUTT

Stormwater Management Division

cc: Peter Schneider, Water Quality Supervisor

Watershed file