



FACILITY COMPLIANCE INSPECTION REPORT

Division of Waste Management

Solid Waste Section

UNIT TYPE:											
Lined MSWLF	X	LCID		YW		Transfer		Compost		SLAS	COUNTY: Guilford PERMIT NO.: 41-04 FILE TYPE: COMPLIANCE
Closed MSWLF		HHW		White goods		Inciner		T&P	X	FIRM	
CDFL		Tire T&P / Collection		Tire Monofill		Industrial Landfill		DEMO		SDTF	

Date of Site Inspection: September 24, 2024

Date of Last Inspection: March 27, 2024

FACILITY NAME AND ADDRESS:

City of High Point Kersey Valley MSW Landfill
3940 E. Kivett Drive
High Point, NC 27261

GPS COORDINATES: Lat.: 35.95416 Long.: -79.93094

FACILITY CONTACT NAME AND PHONE NUMBER:

Mike Spencer, Solid Waste Disposal Superintendent – City of High Point
w. 336-883-3433
c. 336-688-3454
mike.spencer@highpointnc.gov

FACILITY CONTACT ADDRESS:

City of High Point
Mike Spencer, Solid Waste Disposal Superintendent
P.O. Box 230
High Point, NC 27261

PARTICIPANTS:

Chuck Kirchner, Environmental Senior Specialist – Solid Waste Section (SWS)
Mike Spencer, Solid Waste Disposal Superintendent – City of High Point
Charlie Searce, Landfill Supervisor – City of High Point

STATUS OF PERMIT:

Permit to Operate (PTO) issued February 5, 2024 Phase 1-6 - Life of Site Permit
Permit to Construct (PTC) issued same date for Phases 7-10 and Vertical Expansion over Areas 1, 2 & 3

PURPOSE OF SITE VISIT:

Comprehensive Inspection

STATUS OF PAST NOTED VIOLATIONS:

A. Status: In Progress - 15A NCAC 13B .0203(d) states: “By receiving solid waste at a permitted facility, the permittee shall be considered to have accepted the conditions of the permit and shall comply with the conditions of the permit.”

1. Permit to Operate No. 41-04, ATTACHMENT 3, PART I, General Facility Operation Conditions #8 states, “The permittee must develop, and use, a training and screening program at the facility for detecting and preventing unauthorized wastes from being accepted at the facility. At a minimum, the program must include:
 - a. Random inspections of incoming loads or other comparable procedures.
 - b. Records of all inspections.
 - c. Training of personnel to recognize hazardous, liquid and other excluded waste types.
 - d. Development of a contingency plan to properly manage any identified hazardous, liquid, or



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other excluded or unauthorized wastes. The plan must address identification, removal, storage and final disposition of these wastes.”

- B. Status: In Progress - 15A NCAC 13B .1626(1)(f)** states: “Owners or operators of MSWLF units shall develop and implement a waste screening plan as required by G.S. 130A-295.6(g) in accordance with the effective date and applicability requirements of S.L. 2007-550, s. 9.(b). The plan shall comply with 40 CFR 258.20 and shall include screening for the wastes prohibited by Sub-Item (1)(b) of this Rule. Owners and operators of MSWLF units that are not subject to G.S. 130A-295.6(g) shall develop and implement a waste screening plan that shall comply with 40 CFR 258.20 and shall include screening and a contingency plan for the wastes prohibited by Sub-Item (1)(b) of this Rule.”

The City of High Point is in violation of 15A NCAC 13B .0203(d) and 15A NCAC 13B .1626(1)(f) in that random inspections of incoming loads were being conducted and the approved waste screening plan was being implemented, however the frequency of the screenings was not according to the approved Operations Manual. To come into compliance the facility shall conduct waste screenings as described in section 2.3 of the February 2022 Operations Manual.

OBSERVED VIOLATIONS:

None

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 September 24, 2024, Chuck Kirchner met with Mike Spencer and Charlie Searce to conduct a partial inspection of the Kersey Valley MSW Landfill located off E. Kivett Road in High Point, Guilford County.

Facility Information

1. The municipal solid waste (MSW) landfill is located on property owned by the City of High Point. The property also contains a treatment and processing (T&P) operation, a convenience center, and a temporary debris storage and reduction site (TDSR).
2. The landfill is in operation Monday through Friday 7:30 am to 4:30 pm. The convenience center near the entrance is open on Saturday from 7:00 am to 1:00 pm.
3. The MSW landfill consists of two lined fill areas: Area 1, Phases 1 – 3A and Area 2, Phases 4 and 5A and 5B.
4. The MSW landfill has completed construction of Phase 6 and is currently installing the fluff layer and operating in Phase 6.
5. The MSW landfill Area 1 is inactive. It is capped. A partial closure letter, dated December 19, 2016, was issued by the SWS for approximately 23.8 acres (of the approximately 39.1-acre area).
6. The facility is rerouting a portion of Kersey Valley Road that runs between landfill Areas 1 and 2 and will adjoin the landfill areas. The landfill area between the two phases will be Phase 5C.
7. The facility address for landfill Area 1 is 3854 E. Kivett Drive, High Point.
8. The facility address for landfill Area 2 is 3940 E. Kivett Drive, High Point.
9. The facility does not accept scrap tires.
10. White goods are placed in a roll-off container at the convenience center. The white goods are managed by the City of High Point Material Recovery Facility (MRF) and are hauled off once a week.
11. The facility has installed a landfill gas extraction network in Area 1 for expected future use. Landfill gas extraction wellheads have not been installed and a landfill gas collection station has not been constructed.



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12. The facility has installed four candlestick flares atop Area 1. The flares are used for the combustion of passive landfill gas. The flares automatically ignite when needed. If the flares malfunction, landfill gas will vent via the unfinished landfill gas extraction wellhead caps. The wellhead caps are designed to pop off to vent landfill gas.

Records Review

13. Waste Screening logs were observed from March 17, 2024 through September 24, 2024. The frequency of Waste Screenings conducted was observed not to be in accord with the February 2022 Operations Manual, Section 2.3.1, located on pages 14-15 of the manual.
14. **Waste Screening shall be conducted as described in the February 2022 Operations Manual, Section 2.3.1, located on pages 14-15 of the manual. At least one vehicle per week, but not less than 1% by weight of the waste stream entering the facility (based on the previous week's total), will be randomly selected by inspection personnel. See Observed Violation above.**

Site Inspection

15. The facility is currently operating in Phase 6.
16. The facility is permitted to use tarps. Three tarps are commonly used to cover the working face Monday through Thursday and soil cover is used on Friday according to Mr. Spencer.
17. Some exposed waste near the working face observed. This may be from the day's activities. Any exposed waste shall be covered at the end of each working day with a minimum six inches of earthen material or approved alternative daily cover as required in 15A NCAC 13B .1626(2) to control disease vectors, fires, odors, blowing litter, and scavenging.
18. The working face was small and compact.
19. A second working face/fluff layer was being added above the liner in accordance with the approved plan.
20. No unauthorized waste was observed in either working faces.
21. The facility has a leachate pump station that is connected to a pump station located on the south side of the landfill, east of Kersey Valley Road. The municipal sewer system collects leachate from Areas 1 and 2.
22. The facility has a 340,000-gallon leachate storage tank with secondary containment that is no longer used.
23. Phase I has a temporary cap. No eroded rills and a good grass cover were noted in this area. Continue to maintain this area as needed.
24. The facility has white edge of waste markers along Areas 1 and 2.
25. During the inspection, no odor off site was detected.
26. Many inactive areas around the landfill were observed to have a good grass cover. Continue to maintain vegetated areas over the cap per the approved Operations Manual Section 3.0.
27. A convenience center is located near the scale house for residents to drop off waste. Heavy traffic observed this inspection. Traffic appeared to be managed in an orderly manner and minimal waste was observed outside of the containers in this area.
28. No windblown litter observed during this inspection.

General Comments

29. The facility has a wood waste treatment and processing (T&P) operation. Land clearing debris, high carbon to nitrogen ratio material, pallets, treated wood, lumber scraps, engineered wood, and furniture manufacturing waste is ground for use only on the landfill working face access road in lined areas during inclement weather.
30. When the woody material is ground, it is directly off-loaded into roll-off containers or dump trucks and brought to the landfill operations area. Ground treated and engineered wood shall not be stored on the ground outside of the lined landfill and leachate control areas.
31. Ensure to maintain fire access buffers around the T&P stockpile material this inspection.
32. The area allotted for the wood waste T&P operation is ~ 2 acres. The area is also designated as a temporary debris storage and reduction site (TDSR), number DS41-004.



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- 33. The City of High Point Fire Department can be contacted to respond to an emergency at the landfill.
- 34. Access roads are of all-weather construction.
- 35. The facility has proper signage.
- 36. The facility entrance is secured by a locked gate.

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

Chuck Kirchner
Environmental Senior Specialist
Regional Representative

Phone: 336-776-9633

Sent on: September 26, 2024	X	Email		Hand delivery		US Mail	Certified No. []
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Copies: Deb Aja, Western District Supervisor - Solid Waste Section
 Melinda King, Assistant Public Services Director – City of High Point, melinda.king@highpointnc.gov