



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

BLUE RIDGE REGIONAL OFFICE

901 Russell Drive, Salem, Virginia 24153

(540) 562-6700

www.deq.virginia.gov

Travis A. Voyles
Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus
Director
(804) 698-4020

Robert J. Weld
Regional Director

December 14, 2023

VIA ELECTRONIC MAIL

Mr. Clarke Gibson
Director of Solid Waste
Region 2000 Service Authority
361 Livestock Road
Rustburg, Virginia 24588
cgibson@region2000.org

NO DEFICIENCY LETTER

Subject: Region 2000 Landfill – Livestock Road Facility – 361 Livestock Road, Rustburg, VA
Solid Waste Permit (SWP) 610

Dear Mr. Gibson,

On November 30, 2023, the Virginia Department of Environmental Quality Blue Ridge Regional Office staff conducted a compliance inspection of the solid waste management facility operating under SWP610. During this inspection, the facility was evaluated for compliance with the Virginia Waste Management Act, Va. Code § 10.1-1400 *et seq.* (Act), the Virginia Solid Waste Management Regulations, 9 VAC 20-81-10 *et seq.* (Regulations), and SWP610.

During the inspection, no apparent violations of the Act, Regulations, or SWP610 were observed. A copy of the inspection checklist is enclosed.

If you have any questions, please contact me at (540) 597-6585 or nicole.tilley@deq.virginia.gov.

Sincerely,

A handwritten signature in black ink that reads "Nicole Tilley".

Nicole Tilley
BRRO Solid Waste Compliance Inspector

Attachments: Compliance Inspection Report

Region 2000 Landfill – Livestock Road Facility – SWP610

December 14, 2023

Page 2 of 2

CC: *(via email)*

Elliott Inge, Environmental Compliance and Safety Manager, einge@region2000.org

Nichole Herschler, DEQ BRRO Land Protection Program Manager,

nichole.herschler@deq.virginia.gov

ECM – SWP610



Compliance Inspection Report

Inspection Summary

Facility: Region 2000 Regional Landfill - Livestock Rd Fac

Permit: SWP610

Region: Blue Ridge

Inspection Type: Compliance Evaluation Inspection

Facility Staff: Elliot Inge, Environmental Compliance and Safety Manager
Caleb Arrington, Operator

Inspector: Nicole Tilley

Inspection Date: 11/30/2023

Approximate Arrival Time: 9:00 a.m.

Inspection Method: Announced

Exit Interview: Yes

Weather Conditions: The weather was mostly sunny with scattered clouds and temperatures averaging 45 F.

Comments: On November 30, 2023, Nicole Tilley conducted an announced compliance inspection of Region 2000 Landfill - Livestock Road Facility, Campbell County Closed Sanitary Landfill, and Concord Turnpike Closed Sanitary Landfill. The inspection consisted of a tour of the facility, a records review, and exit interview. DEQ departed at approximately 3:00 p.m.

Sanitary Landfill (Active)

| Reference | Description | SL | Result |
|---|--|-----|--------|
| Compliance Area: Operator Information | | | |
| 10.1-1408.1 | Disclosure Statement | I | ✓ |
| 10.1-1408.2 | Operator Certification | II | ✓ |
| Compliance Area: Recordkeeping, Reporting & Permit | | | |
| 20-81-80 | Waste Assessment Program | II | ✓ |
| 20-81-100.B | Compliance with the facility's permit | II | ✓ |
| 20-81-100.E | Unauthorized waste program and inspection | II | ✓ |
| 20-81-140.B.16 | Facility self-inspections | I | ✓ |
| 20-81-140.B.17 | Record maintained of waste received and processed | I | ✓ |
| 20-81-485 | Operations Manual | II | ✓ |
| 20-81-530 | Permittee recordkeeping and reporting | II | ✓ |
| Compliance Area: Design, Construction & Operation | | | |
| 20-81-130 | Facility design / construction | I | ✓ |
| 20-81-140.B.1.4 | Safety and fire control | II | ✓ |
| 20-81-140.B.6 | Pollutant discharge | III | ✓ |
| 20-81-140.B.7 | Stormwater control system maintenance | II | ✓ |
| 20-81-140.B.8,14-15 | Facility operation, maintenance, and training | II | ✓ |
| 20-81-140.B.9-13 | Hazard and nuisance control | I | ✓ |
| 20-81-140.C | Compaction and cover | I | ✓ |
| 20-81-610-660 | Special Waste | II | ✓ |
| Compliance Area: Closure & Post-Closure Care | | | |
| 20-81-160 | Closure requirements | II | ✓ |
| 20-81-170 | Post-closure care requirements | II | ✓ |
| Compliance Area: Decomposition Gas Control | | | |
| 20-81-200.A,B,E | Decomposition gas concentrations, monitoring & recordkeeping | II | ✓ |
| 20-81-200.C | Decomposition gas-remediation | III | ✓ |
| 20-81-200.D | Decomposition gas-odor management | I | ✓ |
| Compliance Area: Leachate Control | | | |
| 20-81-210 | Leachate control | II | ✓ |
| Compliance Area: Groundwater Monitoring | | | |
| 20-81-250 | Groundwater monitoring program | II | ✓ |

| | | | |
|---|---------------------------|----|-----|
| 20-81-260 | Corrective action program | II | N/A |
| Compliance Area: Landfill Mining | | | |
| 20-81-385 & 395 | Landfill Mining | II | N/A |

SL = Severity Level ✓ = In Compliance X = Alleged Violation N/A = Not Applicable Blank = Not Inspected

General Comments

| Reference | Comments |
|----------------|---|
| 10.1-1408.1 | Disclosure Statement - - The disclosure statement is up-to-date with no necessary changes needed. |
| 10.1-1408.2 | Operator Certification - - The facility has operators with valid licenses. |
| 20-81-80 | Waste Assessment Program - - The 2022 SWIA report was received on March 29, 2023. |
| 20-81-100.B | Compliance with the facility's permit - - Permit Module II: Conditions of Operations II.A. The facility operated during normal operating hours. II.B. No unauthorized waste was accepted. II.C. The facility has a daily disposal limit of 2,580 tons per day. The facility operates below the daily disposal limit. II.D. The facility is approved to use posi-shell as alternate daily cover. The facility will apply posi-shell on the work face when waste will be placed in the same area the next operating day. Facility operators will place daily soil cover on the working face at the end of the operating week. |
| 20-81-100.E | Unauthorized waste program and inspection - - E.1. The facility has an unauthorized waste plan, consisting of signs, employee training, and random load inspections. The sign at the front of the entrance lists the hours of operation and the types of solid waste accepted and not accepted. E.2. Facility personnel also screen loads for unauthorized waste when vehicles are unloading at the working face. No unauthorized waste was reported since the previous inspection. E.5. Random load inspections were conducted with the following frequency: August: 61 inspections for 4,846 loads September: 51 inspections for 3,909 loads October: 55 inspections for 4,168 loads The facility is randomly inspecting a minimum of one-percent of the loads accepted at the facility. |
| 20-81-140.B.16 | Facility self-inspections - - The facility conducted monthly self-inspections. The self-inspections for June to October 2023 were reviewed. Minor issues with erosion were noted on the self-inspections and records were complete. |
| 20-81-140.B.17 | Record maintained of waste received and processed - - The facility maintains a record of all waste received and processed. Records include date, quantity, and origin of waste received. Monthly totals are provided below. Month: Total Tonnage: August: 20,758.73 tons September: 15,841.81 tons October: 16,598.18 tons |
| 20-81-485 | Operations Manual - - The facility's Operations Manual was reviewed and re-certified on August 24, 2023 by Clarke Gibson, Director of Solid Waste. |
| 20-81-530 | Permittee recordkeeping and reporting - - B. All required records were made available to DEQ upon request. C. No events requiring 24-hour or 5-day notification to DEQ occurred since the previous inspection. |
| 20-81-130 | Facility design / construction - - A. The landfill has a daily disposal limit of 2,580 tons of solid waste. |

| | |
|---------------------|---|
| | <p>B. The site is screened on all sides by woods and natural barriers. Access roads are gated and portions of the facility are fenced.</p> <p>C. Internal roads are accessible and capable of withstanding heavy loads.</p> <p>D. The facility has a lighted and heated shelter for operating personnel with sanitation facilities.</p> <p>F. The landfill operators have radio communications available.</p> <p>H. The stormwater conveyance system is maintained to control run-on and run-off at the landfill. The stormwater conveyance system was functioning as designed.</p> <p>I. Fire breaks of 50 feet are maintained between the limits of waste and all tree lines.</p> |
| 20-81-140.B.1,4 | <p>Safety and fire control - -</p> <p>A.1. The facility conducts weekly safety trainings.</p> <p>A.4. No evidence of open burning on or near the waste cells was observed.</p> |
| 20-81-140.B.6 | <p>Pollutant discharge - -</p> <p>No leachate or solid waste was observed entering surface waters or wetlands.</p> |
| 20-81-140.B.7 | <p>Stormwater control system maintenance - -</p> <p>The stormwater perimeter ditches appeared to be in good condition and working as intended. The stormwater conveyance system was free of obstructions with no signs of erosion or ponding water. The sediment basin had sufficient wet storage capacity.</p> |
| 20-81-140.B.8,14-15 | <p>Facility operation, maintenance, and training - -</p> <p>A.8. Waste is placed directly into the landfill by vehicles equipped with mechanical unloading. Campbell County and Lynchburg City residents unload by hand at the convenience center. Access is restricted after operating hours by a locked gate at the entrance.</p> <p>A.14. All landfill appurtenances appeared to be properly maintained and operating as designed.</p> <p>A.15. Adequate numbers and types of properly maintained equipment were available for operations. During the inspection, the facility had a loader and compactor operating at the working face.</p> |
| 20-81-140.B.9-13 | <p>Hazard and nuisance control - -</p> <p>No issues regarding blown litter, odors, vectors, salvaging, mud on roadways or access to unauthorized areas of the facility were noted.</p> |
| 20-81-140.C | <p>Compaction and cover - -</p> <p>The facility is now operating in the eastern area of Phase V landfill. The facility is applying a fluff layer over the drainage layer. The working face was observed to be confined to an area appropriate for the amount of incoming waste. Adequate daily soil cover was being applied. The intermediate soil cover on Phase IV landfill was in good condition with no erosion or exposed waste. Soil is stockpiled near the working face.</p> |
| 20-81-610-660 | <p>Special Waste - -</p> <p>Waste tires are being stored in roll-off containers before being sent to Emanuel Tire for disposal.</p> <p>The facility receives white goods, which are processed with other scrap metals, and are stored in roll-offs.</p> |
| 20-81-160 | <p>Closure requirements - -</p> <p>The facility is not seeking closure at this time.</p> |
| 20-81-170 | <p>Post-closure care requirements - -</p> <p>The facility is currently an active landfill and not in post-closure care.</p> |
| 20-81-200.A,B,E | <p>Decomposition gas concentrations, monitoring & recordkeeping - -</p> <p>A. The third 2023 quarterly landfill gas monitoring event was conducted on September 21, 2023. No exceedances of the action level (80% LEL for methane) or compliance level (100% LEL for methane) were reported at the gas boundary probes. No exceedances of the 25% LEL for methane were reported at the building monitoring locations.</p> <p>B. The entire gas monitoring network was inspected. Gas probes were in good condition.</p> <p>E. The second 2023 quarterly monitoring event report was provided for review. All required information was recorded.</p> |
| 20-81-200.C | <p>Decomposition gas-remediation - -</p> <p>The facility has an active gas extraction system with blower and flare system. The blower and flare system were operating during the inspection.</p> |

| | |
|-----------------|---|
| 20-81-200.D | <p>Decomposition gas-odor management - - D.1. The facility follows the most updated Odor Management and Control Plan.</p> <p>D.2. The facility continues to follow up on odor complaints when a complaint is received.</p> <p>D.3. The most recent review and recertification of the Odor Management Plan was conducted on September 15, 2022. The odor management plan is to be reviewed and recertified on an annual basis. Please review and recertify the odor management plan.</p> |
| 20-81-210 | <p>Leachate control - - D. Leachate is hard piped through a pumping station from the leachate holding tank to the Campbell County Utility Service Authority sewer system to the City of Lynchburg Regional WWTP.</p> <p>F. No leachate seeps were observed on the side slopes of the active cells or cells under intermediate cover.</p> |
| 20-81-250 | <p>Groundwater monitoring program - - Groundwater Network: Background Monitoring Wells: MW-7 and MW-12 Down-gradient wells: MW-5B, MW-8, MW-9A, MW-13, MW-19, and MW-22</p> <p>Wells were in good condition with locked well caps. The concrete aprons were in good condition with no cracks and no erosion around the concrete pad. All wells were labeled.</p> <p>Underdrains: Two underdrains are associated with the Phase IV/V expansion that flow out into the north sediment basin. The underdrains were not flowing during the inspection.</p> <p>Monitoring: The facility monitors quarterly in a detection monitoring program due to the close proximity of wetlands.</p> |
| 20-81-260 | <p>Corrective action program - - The facility is not in corrective action.</p> |
| 20-81-385 & 395 | <p>Landfill Mining - - Landfill mining is not occurring at the facility.</p> |

Disclosure Statement Details

| Key Personnel | Title |
|-------------------|--------------------------|
| Alexander Brebner | Executive Director |
| Clarke W. Gibson | Director of Solid Waste |
| Elliott L. Inge | Environmental Technician |
| Larry P. Hall | Operations Manager |

Disclosure Statement Last Updated: 9/1/2022

Waste Management Facility Operators

| Licensed Operator | License # | Expiration Date |
|---------------------|------------|-----------------|
| Clarke Gibson | 4605003027 | 11/30/2023 |
| Elliott Inge | 4605002579 | 7/31/2025 |
| Larry P. Hall | 4605002033 | 12/31/2024 |
| Shain R. Greenawalt | 4605003764 | 7/31/2024 |

PLEASE advise the Regional Office within 10 calendar days if any information noted in this report is incorrect, if you have taken appropriate action to meet compliance, or if there is other information that the department should consider regarding any alleged violations.

PLEASE be advised that this report is not an agency proceeding or determination which may be considered a case decision under the Administrative Process Act (VA Code 2.2-4000 et seq). If informal discussions do not lead to a satisfactory conclusion on the contents of this report, you may request in writing that DEQ take all necessary steps to issue a final decision or fact finding under the APA on whether or not a violation has occurred.