



COMMONWEALTH of VIRGINIA

Molly Joseph Ward
Secretary of Natural Resources

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March 10, 2017

Mr. Clarke Gibson
Region 2000 Service Authority
361 Livestock Road
Rustburg, Virginia 24588

INSPECTION REPORT – NO DEFICIENCY

Re: Region 2000 Livestock Road Regional Landfill - Campbell Co. VA
SWP610 - Unannounced CEI

Dear Mr. Gibson:

On February 17, 2017, staff from the Virginia Department of Environmental Quality's Blue Ridge Regional Office 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 Law (1950 Code of Virginia, as amended, §10.1-1400 *et seq.*), the Virginia Solid Waste Management Regulations (VSWMR, 9VAC20-81-10 *et seq.*) and SWP610.

During the inspection, no apparent violations of your permit or the Virginia Waste Management Law and Regulations were observed. A copy of the inspection checklist is enclosed.

If you have any questions, please contact me at douglas.foran@deq.virginia.gov or (434) 5821-6226.

Sincerely,

A handwritten signature in blue ink, appearing to read "Doug Foran".

Doug Foran
BRRO Solid Waste Compliance Inspector

Copy: Robert Arthur, Region 2000
DEQ - BRRO ECM Solid Waste Files



Compliance Inspection Report

Inspection Summary

Facility: Region 2000 Regional Landfill - Livestock Rd Fac

Inspector: Douglas Foran

Permit: SWP610

Inspection Date: 2/17/2017

Region: Blue Ridge

Approximate Arrival Time: 8:30 am

Inspection Type: Compliance Evaluation Inspection

Inspection Method: Unannounced

Facility Staff: Robert Arthur, Environmental Compliance Coordinator and Licensed Landfill Operator

Exit Interview: Yes

Weather Conditions: Sunny - 34 F - Wind SSW at 4 mph - Humidity 59% - BP 29.99

Comments: Departed site at 11:00 am.

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	I	✓
20-81-100.B	Compliance with the facility's permit	II	✓
20-81-100.E	Unauthorized waste program and inspection	II	✓
20-81-140.A.16	Facility self inspections	I	✓
20-81-140.A.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.A.1,4	Safety and fire control	II	✓
20-81-140.A.6	Pollutant discharge	III	✓
20-81-140.A.7	Stormwater control system maintenance	II	✓
20-81-140.A.8,14-15	Facility operation, maintenance, and training	II	✓
20-81-140.A.9-13	Hazard and nuisance control	I	✓
20-81-140.B	Compaction, cover & working face	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	
Compliance Area: Landfill Mining			

20-81-385 & 395	Landfill Mining	II	
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SL = Severity Level ✓ = In Compliance X = Alleged Violation N/A = Not Applicable Blank = Not Inspected

General Comments

Reference	Comments									
20-81-80	Waste Assessment Program - The Solid Waste Information and Assessment (SWIA) Report is due to the Department on or before March 31, 2017. For on-line submittal go to http://www.deq.virginia.gov/SWIAWebApp/login.jsp . Questions may be directed to Daniel Patton at Daniel.Patton@deq.virginia.gov .									
20-81-100.B	<p>Compliance with the facility's permit - Item 1 - Extension of the initial demonstration period for Posi-Shell application as an interim odor control – On April 8, 2016, DEQ approved a 180 day demonstration period for the use of Posi-Shell as an interim odor control measure on the north and west slopes of active Cell 3. On or about December 6, 2016, the 180 day demonstration period concluded. Due to weather conditions and discussions between the facility and the Posi-Shell vendor, on December 13, 2016, the facility requested, and was granted, an additional 120 days to evaluate the effectiveness of the Posi-Shell. DEQ approved the 120 day extension on January 11, 2017. (See additional comments regarding the material under 20-81-140.A.9 - Hazard and nuisance control.)</p> <p>Item 2 - Section II.C of Permit Module II states that the landfill is limited to a daily disposal limit of 2,580 tons/day. The facility provided the following total monthly tonnage and daily average tonnages for December 2016 and January 2017.</p> <table border="0"> <tr> <td>Month.....</td> <td>Daily average tonnage.....</td> <td>Total monthly tonnage</td> </tr> <tr> <td>December</td> <td>580.49</td> <td>15,673.07</td> </tr> <tr> <td>January</td> <td>567.68</td> <td>14,759.54</td> </tr> </table>	Month.....	Daily average tonnage.....	Total monthly tonnage	December	580.49	15,673.07	January	567.68	14,759.54
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December	580.49	15,673.07								
January	567.68	14,759.54								
20-81-100.E	<p>Unauthorized waste program and inspection - The facility has its operating hours posted at the front gate. A sign identifying unauthorized wastes is posted prior to the scale house.</p> <p>Sufficient random load inspections were documented to meet the 1% requirement for December 2016 and January 2017.</p> <table border="0"> <tr> <td>Month.....</td> <td>Inspections conducted.....</td> <td>Loads received</td> </tr> <tr> <td>December.....</td> <td>40.....</td> <td>3065</td> </tr> <tr> <td>January</td> <td>40</td> <td>2958</td> </tr> </table>	Month.....	Inspections conducted.....	Loads received	December.....	40.....	3065	January	40	2958
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December.....	40.....	3065								
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20-81-140.A.16	Facility self inspections - Facility staff performed monthly self-inspections on December 15, 2016 and January 30, 2017.									
20-81-140.A.17	Record maintained of waste received and processed - Facility staff created tickets for individual waste loads and maintained monthly records of waste types and tonnages for monthly and annual reporting.									
20-81-485	Operations Manual - Facility staff provided an Operations Manual Certification statement, dated December 15, 2016, and signed by Clarke Gibson, P.E., Region 2000, Director of Solid Waste. The certification meets the requirements of this section.									
20-81-530	<p>Permittee recordkeeping and reporting - All required records were maintained at the facility and available to the DEQ staff at the time of the inspection.</p> <p>As previously requested by DEQ on September 29, 2016, the facility provides 24 hour and 5 day notifications to DEQ for significant breakdowns of the odor management system when necessary. No breakdowns were reported since the previous inspection conducted on December 2, 2016.</p>									
20-81-130	Facility design / construction - 130.B – Unauthorized after-hours access to the facility is prevented by a gate (equipped with an electric motor and keypad), fencing and natural barriers.									
20-81-140.A.1,4	<p>Safety and fire control - 140.A.1 – Safety meeting minutes for December 1, 2016 through February 16, 2017 were reviewed. Materials presented and sign-in sheets listing subject, date, instructor, location and attendees were provided.</p> <p>140.A.4 – No indication of open burning of waste was found.</p>									
20-81-140.A.6	Pollutant discharge - No leachate, pollutants or other solid waste as described under subsections 140.A.6.a through 140.A.6.d were observed entering surface waters or wetlands at the facility.									
20-81-140.A.7	<p>Stormwater control system maintenance - The stormwater ditch lines were clear without obstructions.</p> <p>The corrugated pipe slope drains and diversionary ditch lines were in place along the north slope of Cell 3 and appeared to be conveying stormwater down the slope without creating erosion rills.</p> <p>The sediment basins appeared to have sufficient wet storage capacity remaining.</p>									
20-81-140.A.8,14-15	Facility operation, maintenance, and training - Sufficient equipment and trained operators were present at the working face. A 963 Cat track loader and an Aljohn compactor were in operation. Additional equipment available for use included a second compactor, a second Cat 963 track loader, an off-road dump truck, an excavator and a water truck.									
20-81-140.A.9-13	Hazard and nuisance control - 140.A.9 - Weekly litter cleanup was documented for December 2016 and January 2017. The facility had two employees picking up litter at the time of the inspection. A significant amount of blowing litter had accumulated on the southern slope of Cell 3 and along the southern perimeter chain link litter fence. Mr. Arthur explained the litter came from heavy winds late in the week prior to the inspection. The facility uses temporary service employees for litter pickup and a work group of up to 8 temporary employees was scheduled for the upcoming week. Mr. Arthur notified DEQ by email on									

progress on litter pickup for February 21 through February 28. Pictures accompanying the February 24 and 28 email showed all the litter picked up.

140.A.10 - Odors and vectors – No vector issues were noted.

In addition to the odor management systems and practices in place, the facility continued to operate the daily working face in the north-east portion of Cell 3. This moves the LF operation as far as possible from the Poplar Ridge sub-division and Calohan Rd during the winter season. (See additional comments under 20-81-140.B.1.a - Compaction, cover & working face.)

The facility issued two odor management systems reports, dated November 23 and December 6, 2016.

The following ongoing odor control mechanisms and procedures were observed:

1. Active gas extraction system (Initiated August 2, 2016) - The high capacity blower/flare was in operation. The facility notified DEQ by email on November 21, 2016, that the new system began operation. This system collects gases through a series of gas collection wells drilled into the waste cell on the northern and southern slopes and collects gas through the Leachate Cleanout Landfill Gas System. Pumps to extract water from the gas extraction wells were also installed.

2. Posi-Shell/Interim odor control (Initial application June 16, 2016) – The reapplication of Posi-Shell to the north and west slopes of Cell 3, that was completed on November 22, 2016, appeared to be holding up better than the previous initial application. Facility employees have taken over maintenance and reapplication of the material as needed. A work crew, consisting of facility employees, was reapplying the material to areas damaged by recent storms at the time of the inspection. (See additional inspection report comments regarding the demonstration period under 20-81-100.B - Compliance with facility's permit.)

3. Portable misting canon (Initiated March 25, 2016) - The large portable unit was not service at the time of the inspection due to colder weather conditions. The unit was stored at the facility's equipment shop and will be placed back in service when temperatures are consistently above freezing.

4. Perimeter vapor system (Initiated March 16, 2016) - The system was operational along the west (Poplar Ridge) and south (Rt. 24 - Colonial Highway) cell slopes. The inspector checked for vapor discharge at both ends of the pipeline. The vapor was discharging at both ends. The housing containing the reservoir for the liquid vapor agent and the blower system are to be replaced spring 2017.

5. Leachate Cleanout Landfill Gas System/Flare (Initiated June 15, 2015) - The system, which draws LF gases from the leachate collection system and burns them off through the facility's updated blower/flare system, was in operation. Piping and connections to the leachate collection system were intact.

6. WWTP Sludge (Initiated June 18, 2015) - The pH level of WWTP sludge received by the facility from the City of Lynchburg Regional WWTP continued to be increased to help control odor. Received sludge loads are sprayed with a deodorizer before being placed in the active working face. The total quantity of the WWTP sludge generated has been divided between the Region 2000 SLF, the Amelia SLF, and permitted land applications.

140.A.13 - Internal roads were maintained and allowed access to all active areas of the facility.

20-81-140.B

Compaction, cover & working face - 140.B.1.a – The working face was located on the top lift of the north east portion of Cell 3. While additional waste will be placed in the western portion in the spring to bring that section to its final elevation, the facility shifted working face operations to the east to increase the distance from the working face to the Poplar Ridge sub-division and Calohan Rd. during the winter.

Waste was spread into a thin layer over the active working face and compacted into place.

140.B.1.b – Lifts appeared to be approximately 10 feet in height.

140.B.1.c – Soil and Posi-Shell are used for daily cover. A soil only daily cover is applied over the weekend. Posi-Shell has a deodorizing agent included.

140.B.1.d – Intermediate cover had been applied to slopes of the waste cell. Intermediate soil cover of all outer slopes was intact. Seeding of slopes had been completed and grass seed was germinating. Application of intermediate cover over a recently used wet weather area was ongoing at the time of the inspection.

140.B.2 – The active working face appeared to be reasonably sized for the volume of waste received.

140.B.4 – No unauthorized waste was observed in the working face.

140.B.5 – No white goods were observed in the working face.

20-81-610-660

Special Waste - 620 - Asbestos containing material (ACM) - Region 2000 Special Waste Disposal Request forms for receiving ACMs and other special waste were reviewed for December 2016 and January 2017.

640 - Tire management - As noted in previous inspection reports, tires are being used on Cell 4 as anchors for the rain covering over the newly constructed cell. At the time of the current inspection, these tires remain in placed in a grid pattern on the Cell 4 rain cover for that purpose.

	No tires had been hauled to Emanuel Tire since October 27, 2016. Three open top bins were on-site which will be hauled. 650 - White goods management – No metals were hauled for recycling since October 5, 2016.
20-81-200.A,B,E	Decomposition gas concentrations, monitoring & recordkeeping - 200.A – First quarter 2017 landfill gas (LFG) monitoring was conducted on February 7, 2017. No exceedances of the lower explosive limit (LEL) or levels reaching the 80% action level for methane were reported at gas boundary probes BP-05 through BP-319. No methane gas levels were reported requiring action in the facility's scale house or maintenance building. 200.E – The first quarter monitoring report was reviewed at the facility's office. All required information was included.
20-81-200.D	Decomposition gas-odor management - 200.D.1 – The facility follows the updated Odor Management and Control Plan (OMCP), dated June 17, 2016. The updated OCMCP replaced the previous November 10, 2011 plan. Odor control strategies are given in Section 3.0 through 3.9 – Strategies for Controlling Odors. 200.D.2 – Section 5.0 of the updated OMCP states that documentation of odor complaints will be maintained and will be available for authorized officials. During the inspection, DEQ staff reviewed the facility's odor complaint log for December 2016 and January 2017. Month Number of complaints December 15 January 12 The facility continues to follow up on odor complaints. The complaints documented by the facility closely match the complaints received and logged by DEQ.
20-81-210	Leachate control - The facility provided the Leachate Flow Meter Readings chart for December 31, 2016 to January 31, 2017. 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. No leachate outbreaks were observed at the active waste cell or in the area around the leachate tank and pumping station.

Disclosure Statement Details

Key Personnel	Title
Clarke W. Gibson	Director of Solid Waste
Dianne D. Dodd	Region 2000
Elliott L. Inge	Operator
Felicia D. West	Region 2000
Gary Christie	Region 2000
Kenneth Jarman	Operator
Larry P. Hall	Operations Manager
Robert Arthur	Environmental Compliance and Safety Manager
Troy F. Manuel	Operator

Waste Management Facility Operators

Licensed Operator	License #	Expiration Date
Clarke Gibson	4605003027	11/30/2017
Diane Dodd	4605002034	8/31/2018
Elliott Inge	4605002580	7/31/2017
Kenneth Jarman	4605002635	11/30/2017
Larry P. Hall	46050020133	12/31/2016
Robert Arthur	4605002613	3/31/2018
Troy Manuel	4605002580	7/31/2017

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.