



COMMONWEALTH of VIRGINIA

Matthew J. Strickler
Secretary of Natural Resources

DEPARTMENT OF ENVIRONMENTAL QUALITY
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David K. Paylor
Director

Robert J. Weld
Regional Director

March 16, 2020

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

Re: Region 2000 Landfill - Livestock Road Facility – Solid Waste Permit (SWP) 610
Announced Compliance Inspection – February 11, 2020

Dear Mr. Gibson:

On February 11, 2020, 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 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) 562-6740 or nicole.tilley@deq.virginia.gov.

Sincerely,

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

Nicole Tilley
Solid and Hazardous Waste Compliance Inspector

cc: Mr. Robert Arthur, Region 2000 Environmental Compliance Coordinator
DEQ 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: Mr. Robert Arthur, Environmental Compliance Coordinator

Mr. Jamie Jarman, Field Service

Inspector: Nicole Tilley

Inspection Date: 2/11/2020

Approximate Arrival Time: 8:45 a.m.

Inspection Method: Announced

Exit Interview: Yes

Weather Conditions: The weather was cloudy with slight rain. Temperatures averaging 50 degrees F. Ground conditions were muddy. The facility experienced several storm events prior to the inspection. Rain totals for February leading up to the inspection are as followed:

February 4: 0.01 inches; February 5: 0.29 inches; February 6: 2.43 inches; February 10: 0.49 inches; February 11: 0.59 inches; February 12: 0.03 inches; February 13: 0.53 inches.

Comments: On February 11, 2020, 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. Mr. Arthur assisted in the site tours, records review, and exit interview. Mr. Jarman assisted during the site tour of Livestock Road Facility. DEQ departed at approximately 2:00 p.m.

The facility has completed the closure construction of the western portion of the Phase III Landfill. The side slopes are seeded and the liner boundaries are marked.

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.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	N/A
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
20-81-100.B	<p>Compliance with the facility's permit - - The facility has a daily disposal limit of 2,580 tons per day. The facility operates below the daily disposal limit. Monthly totals August 2019 to January 2020 are provided below.</p> <p>Period: Total Tonnage August 2019: 17,441.24 tons September 2019: 16,344.43 tons October 2019: 17,760.31 tons November 2019: 16,041.07 tons December 2019: 16,782.91 tons January 2020: 15,750.69 tons</p>
20-81-100.E	<p>Unauthorized waste program and inspection - - The facility has an unauthorized waste plan in place, consisting of signs, employee training, and random load inspections. Random load inspections were conducted with the following frequency:</p> <p>August 2019: 51 inspections for 3,876 loads September 2019: 50 inspections for 3,642 loads October 2019: 51 inspections for 3,849 loads November 2019: 48 inspections for 3,587 loads December 2019: 47 inspections for 3,506 loads January 2020: 48 inspections for 3,548 loads</p> <p>No unauthorized waste was reported since the previous inspection.</p>
20-81-140.A.16	<p>Facility self inspections - - The facility conducted monthly self-inspections August 23, September 26, October 30, November 26, December 18, 2019 and January 24, 2020. No major issues were noted in self-inspection and records were complete.</p>
20-81-140.A.17	<p>Record maintained of waste received and processed - - The facility maintains a record of all waste received and processed.</p>
20-81-485	<p>Operations Manual - - The facility's Operations Manual was reviewed and re-certified on December 17, 2019.</p>
20-81-530	<p>Permittee recordkeeping and reporting - - B. All required records were made available to DEQ upon request.</p> <p>C. On Tuesday, December 24, 2019, the landfill gas flare shut down due to a drop in electrical current. The network warning and notification system failed and the facility did not receive notice that the flare was not operating. The landfill was closed on Wednesday, December 25, 2020. On Thursday, December 26, 2019, facility personnel discovered the flare was not operating when they arrived to work that morning and restarted the flare. Facility personnel provided a 24-hour verbal notification on December 27, 2019 and a 5-day written notification on January 3, 2020.</p>
20-81-130	<p>Facility design / construction - - Ponding water was observed near the working face and on the daily cover of the southwest Phase IV waste cell within the liner boundary. The facility personnel should maintain the drainage structures to minimize infiltration of water into the solid waste cells and make repairs as necessary. See attached photos.</p>

20-81-140.A.1,4	<p>Safety and fire control - - 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.A.6	<p>Pollutant discharge - - Ponding water and blown litter were observed in the southwestern stormwater channels around Phase IV. The blown litter needs to be removed from the stormwater channel to prevent solid waste from entering surface water or wetlands. Facility personnel were observed cleaning up the blown litter during the inspection.</p>
20-81-140.A.7	<p>Stormwater control system maintenance - - Ponding water was observed on the intermediate cover of the northwest corner of the Phase IV waste cell and on the daily cover and working face of the southwest corner of the Phase IV waste cell. Mr. Arthur stated the facility would evenly grade the area when the ground dried out. The ponding water on the northwest corner is considered contact stormwater and can be drained into the stormwater channels. The ponding water on the southwest slope had areas of black liquid and made contact with waste. The ponding water should be managed as leachate. See comments in 9VAC20-81-130.</p> <p>Ponding water and blown litter were observed in the southwest stormwater channels around Phase IV. The channel should be reworked to allow the stormwater to flow to the sediment basin. See attached photos.</p>
20-81-140.A.8,14-15	<p>Facility operation, maintenance, and training - - 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.A.9-13	<p>Hazard and nuisance control - - A.9. The portable litter fencing was in place near the working face. Some blown litter was observed on the northwest and southwest side slopes and stormwater ditches of the Phase IV landfill. Blown litter was also observed in the wetlands. The facility picks up blown litter on a weekly basis and stated they would have the area cleaned up by the end of the week. Facility personnel were observed cleaning up the blown litter during the inspection.</p> <p>A.10. The following ongoing odor control mechanisms and procedures were observed:</p> <ul style="list-style-type: none"> - Active gas extraction system (Initiated August 2, 2016) – The high capacity blower/flare was in operation. Landfill gases are being drawn from gas extraction probes on Phase III and flared. - Posi-Shell/Interim Odor Control/ Daily Cover (Initial application June 16, 2016). The facility had sufficient daily cover. - Odor Boss Canon (Portable roll-off mounted misting unit – Initiated March 25, 2016). The odor cannon went back into operation on April 23, 2019. The odor cannon was operating near the working face at the time of the inspection. The vapor cannon has been winterized and is not currently in use. The facility plans to bring the unit back in operation during the warmer months. - Byers Vapor System (Primary perimeter system – Initiated March 16, 2016). Both the original primary system and the portable system were in operation. The primary system was operational along the western (Poplar Ridge) and southern (facing Rt. 24 – Colonial Highway) cell slopes. The portable system (Initiated March 2018) is a self-contained system mounted on a utility trailer. This extension covers approximately 800 feet of the southern boundary of Phase IV. The trailer carries the power generator, Byers tank, mixing chamber, and blower unit, and vapor distribution pipeline. -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. <p>A.11. No issues regarding salvaging were observed.</p> <p>A.12. No issues regarding dust or mud on main off-site roads and access roads were observed.</p> <p>A.13. Ponding water and shallow ruts were observed on the internal roads around southwest area of Phase IV. It was still passable by ordinary vehicles; however, DEQ recommends regarding the road before deep ruts form and the road becomes impassable. Mr. Arthur stated that the facility would address this area during dry weather conditions. See attached photos.</p>

20-81-140.B	<p>Compaction, cover & working face - - At the time of the inspection, the facility was operating a working face at the southwestern area of Phase IV. The working face was observed to be confined to an area appropriate for the amount of incoming waste. Adequate cover soil was being applied with good compaction. Soil is stockpiled near the working face.</p> <p>Erosion was observed on the intermediate cover of the southern side slopes of Phase III. Waste was not exposed. DEQ recommends regrading the area to prevent further erosion.</p>
20-81-610-660	<p>Special Waste - - 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>
20-81-200.A,B,E	<p>Decomposition gas concentrations, monitoring & recordkeeping - - A. The quarterly landfill gas monitoring events were conducted on November 15, 2019 and January 27, 2020. No exceedances of the compliance level for methane or the action level for methane were reported at the gas boundary probes. No exceedances of the 25% compliance levels for methane were reported at the building monitoring locations.</p> <p>B. Facility conducts quarterly landfill gas monitoring.</p> <p>E. The fourth quarter 2019 monitoring event and the first quarter 2020 monitoring event reports were provided for review. All required information was recorded.</p>
20-81-200.C	<p>Decomposition gas-remediation - - The facility has an active gas extraction system. The blower and flare system were in 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 dated June 17, 2016. The plan is reviewed yearly for minor changes. Odor control strategies are given in Section 3.0 through 3.9 – Strategies for Controlling Odors.</p> <p>D.2. Section 5.0 of the updated plan states that documentation of odor complaints will be maintained and will be available for authorized officials. During the inspection, DEQ and the facility reviewed and discussed recent odor complaints. During the inspection, DEQ staff reviewed the facility's odor complaint log.</p> <p>The facility continues to follow up on odor complaints.</p>
20-81-210	<p>Leachate control - - 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>Leachate seeps were observed on the daily cover on the southern active area. Leachate seeps were contained within the liner boundary and had not reached stormwater channels. The facility should address the leachate seep promptly.</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.</p> <p>Monitoring: The facility monitors quarterly in a detection monitoring program. Groundwater monitoring events occurred on March 5, June 5 and September 3, 2019.</p> <p>Reporting: DEQ received the 2018 Annual Groundwater Monitoring Report on May 10, 2019. DEQ's technical review of the report is covered under separate correspondence.</p>

Disclosure Statement Details

Key Personnel

Title

Clarke W. Gibson	Director of Solid Waste
Elliott L. Inge	Environmental Technician

Felicia D. West	Region 2000
Gary Christie	Region 2000
Kenneth Jarman	Working Field Supervisor
Larry P. Hall	Operations Manager
Robert Arthur	Environmental Compliance and Safety Manager

Disclosure Statement Last Updated: 1/12/2018

Waste Management Facility Operators

Licensed Operator	License #	Expiration Date
Clarke Gibson	4605003027	11/30/2019
Elliott Inge	4605002580	7/31/2019
Kenneth Jarman	4605002635	11/30/2019
Larry P. Hall	4605002033	12/31/2020
Robert Arthur	4605002613	3/31/2020

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.