



COMMONWEALTH of VIRGINIA

Matthew J. Strickler
Secretary of Natural Resources

DEPARTMENT OF ENVIRONMENTAL QUALITY
Blue Ridge Regional Office
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David K. Paylor
Director

Robert J. Weld
Regional Director

May 30, 2019

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 – SWP 610
Announced Focused Compliance Inspection – May 8, 2019

Dear Mr. Gibson:

On May 8, 2019, staff from the Virginia Department of Environmental Quality's Blue Ridge Regional Office conducted a focused compliance inspection of the solid waste management facility operating under SWP 610. 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 SWP 610.

During the inspection, no apparent violations of the Act, Regulations, or SWP 610 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
Hazardous and Solid 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: Focused Compliance Inspection

Facility Staff: Mr. Robert Arthur, Environmental Compliance Coordinator

Other DEQ Staff: Daniel Patton (Solid Waste Inspector), Jenny Poland (Solid Waste Permit Writer)

Comments: On May 8, 2019, Daniel Patton, Jenny Poland, and Nicole Tilley conducted an announced focused compliance inspection of Region 2000 Landfill - Livestock Road Facility. The inspection consisted of a tour of the facility focusing on the construction for closure of Phase III. Mr. Arthur assisted in the site tour. DEQ departed at approximately 11:30 a.m.

Inspector: Nicole Tilley

Inspection Date: 5/8/2019

Approximate Arrival Time: 9:20 a.m.

Inspection Method: Announced

Exit Interview: Yes

Weather Conditions: The weather was sunny with slight winds from the northeast. Temperatures averaging 70 degrees F. Ground conditions were mostly dry.

The facility has begun construction for the partial closure of Phase III. The facility has completed ditch line work along the base of Phase III and adding extensions on the leachate clean outs. The facility has also completed grading and compacting the clay liner on the western side slopes. Contractors were placing and welding the liner system over the western area of Phase III landfill.

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	
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	

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

General Comments

Reference	Comments
20-81-140.A.6	Pollutant discharge - - No leachate or solid waste was observed entering surface waters or wetlands.
20-81-140.A.7	Stormwater control system maintenance - - During the previous inspection, DEQ observed ponding water on the top of the Phase III waste cell. Facility personnel have evenly graded the area and DEQ did not observe ponding water.
20-81-140.A.9-13	Hazard and nuisance control - - A.9. During the previous inspection, DEQ observed blown litter on the northwest side slopes and stormwater ditches of the landfill. Facility personnel have cleaned up the areas and DEQ did not observe issues regarding blown litter. A.10. The following ongoing odor control mechanisms and procedures were observed: - 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 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. A.11. No issues regarding salvaging were observed. A.12. No issues regarding dust or mud on road ways were observed. A.13. Internal roads were well maintained and allowed access to all areas of the facility.
20-81-140.B	Compaction, cover & working face - - At the time of the inspection, the facility was operating a working face at the northwestern 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 and soil is stockpiled near the working face. Intermediate cover appeared to be in good condition.
20-81-200.D	Decomposition gas-odor management - - D.1. The facility follows the updated Odor Management and Control Plan dated June 17, 2016. Odor control strategies are given in Section 3.0 through 3.9 – Strategies for Controlling Odors. 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 staff reviewed the facility's odor complaint log. The facility continues to follow up on odor complaints.

20-81-210

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.

No leachate seeps were observed on the side slopes of the active cells or cells under intermediate cover.

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.