



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

November 19, 2018

Sent via electronic mail

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

NO DEFICIENCY LETTER

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

Dear Mr. Gibson:

On October 31, 2018, 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) 524 - 8221 or Douglas.Foran@deq.virginia.gov.

Sincerely,

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

Doug Foran
BRRO Solid Waste Inspector

Copy: Robert Arthur, Region 2000
ECM – SWP610



Compliance Inspection Report

Inspection Summary

Facility: Region 2000 Regional Landfill - Livestock Rd Fac

Inspector: Douglas Foran

Permit: SWP610

Inspection Date: 10/31/2018

Region: Blue Ridge

Approximate Arrival Time: 8:50 am

Inspection Type: Compliance Evaluation Inspection

Inspection Method: Unannounced

Facility Staff: Larry "Buzz" Hall, Operations Coordinator and Licensed Landfill Operator, Kenneth Jarman, Field Supervisor and Licensed Landfill Operator, Robert Arthur, Environmental Compliance Coordinator and Licensed Landfill Operator

Exit Interview: Yes

Weather Conditions: Sunny - 45 F

Comments: The inspector was greeted by Larry "Buzz" Hall, Operations Coordinator, and Licensed Landfill Operator. Mr. Hall assigned Kenneth Jarman, Field Supervisor, and Licensed Landfill Operator to conduct the field portion of the inspection with the inspector. Robert Arthur, Environmental Compliance Coordinator, and Licensed Landfill Operator conducted the records review for both the SWP610 SLF and the SWP558 CSLF following the field inspection of SWP610. The onsite inspection for SWP558, which is located a few miles away from SWP610, was conducted with Mr. Arthur following completion of the records review.

The inspector departed the site at 4:00 pm.

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									
20-81-100.B	<p>Compliance with the facility's permit - Permit Module II, Section II.C states that the landfill is limited to a daily disposal limit of 2,580 tons/day. The facility provided the following total monthly tonnages and daily average tonnages for August and September 2018.</p> <table border="0" style="width: 100%;"> <tr> <td>Month.....</td> <td>Daily Average.....</td> <td>Monthly Total</td> </tr> <tr> <td>Aug.</td> <td>725.77.....</td> <td>19,595.80</td> </tr> <tr> <td>Sept.</td> <td>704.22.....</td> <td>15,844.89</td> </tr> </table>	Month.....	Daily Average.....	Monthly Total	Aug.	725.77.....	19,595.80	Sept.	704.22.....	15,844.89
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Sept.	704.22.....	15,844.89								
20-81-100.E	<p>Unauthorized waste program and inspection - 100.E.1 - The facility's operating hours are posted at the front gate. A sign identifying unauthorized wastes is posted prior to the scale house.</p> <p>100.E.1 - Annual retraining for unauthorized waste recognition was conducted on January 23, 2018. Additional training for recognizing asbestos containing materials was provided on April 26, and May 3, 2018.</p> <p>100.E.5 - Sufficient random load inspections were documented to meet the 1% requirement for May, June and July 2018. The facility does not receive out of state waste.</p> <table border="0" style="width: 100%;"> <tr> <td>Month.....</td> <td>Inspections conducted.....</td> <td>Loads received</td> </tr> <tr> <td>Aug.</td> <td>56.....</td> <td>3330</td> </tr> <tr> <td>Sept.</td> <td>44.....</td> <td>4254</td> </tr> </table>	Month.....	Inspections conducted.....	Loads received	Aug.	56.....	3330	Sept.	44.....	4254
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20-81-140.A.16	Facility self inspections - The facility performed monthly self-inspections on August 30, September 28 and October 24, 2018. Inspection reports were reviewed and were complete.									
20-81-140.A.17	Record maintained of waste received and processed - The facility creates tickets for individual waste loads and maintains monthly records of waste types and tonnages.									
20-81-485	Operations Manual - During the inspection, Mr. Arthur was reminded that the Operations Manual must be reviewed, updated (if necessary) and certified annually. The current certification statement is dated December 15, 2017, and signed by Clarke Gibson, P.E.									
20-81-530	<p>Permittee recordkeeping and reporting - 530.B - All required records were maintained at the facility and available to DEQ staff.</p> <p>530.C.3 – No 24-hour or 5-day notifications were required since the previous inspection on August 7, 2018.</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 - 530.B - All required records were maintained at the facility and available to DEQ staff.</p> <p>530.C.3 – No 24-hour or 5-day notifications were required since the previous inspection on August 7, 2018.</p>									
20-81-140.A.6	Pollutant discharge - No indication of solid waste from SWP610 impacting the unnamed tributary of Tussocky Creek located between the SWP610 Livestock Rd. SLF, owned by Region 2000, and SWP285 Campbell Co. Closed SLF, owned by Campbell County, VA, was found. No surface monitoring of the tributary is made in regard to the operation of SWP610. Surface water sampling is conducted for SWP285.									
20-81-140.A.7	<p>Stormwater control system maintenance - Facility equipment operators were engaged in ditch line maintenance along the base of Phase III. Sediment was being removed from the ditch line and existing rip rap check dams were being cleared of sediment and re-established on the south side of the waste cell's haul road. Ditch lines around the western and northern slopes of Phase III had marginal sediment buildup, but were open. No indication of stormwater overflow of the ditch lines onto the haul roads was found.</p> <p>Phase IV ditch lines were open.</p> <p>Other stormwater controls, including other facility ditch lines, check dams, the underdrain and run-on, run-off controls for the waste cells were in place and in good repair. The facility's two sediment basins were retaining stormwater to the level of their</p>									

	<p>dewatering pipe. The pre-basin for sediment basin on the north side of Phase III and IV should be cleared of sediment when conditions allow.</p> <p>No indication of stormwater flow bypassing the stormwater system was found.</p>
20-81-140.A.8,14-15	<p>Facility operation, maintenance, and training - 140.A.15 – Sufficient equipment and trained operators were present. A Cat 963 track loader and an Aljohn compactor were in operation at the active working face on Phase IV. A second Aljohn compactor the facility's full sized excavator, off-road dump truck, water truck and Cat scraper pan were available for use. The Cat D-6 dozer was in use preparing the southern slope of Phase III for seeding and the facility's small excavator was in use repairing stormwater ditch lines on Phase III. At the facility's shop, a new Cat 963 track loader was being prepared to go into service and the facility's Cat 973 track loader was down for repairs.</p>
20-81-140.A.9-13	<p>Hazard and nuisance control - 140.A.9 - Weekly litter cleanup was documented for August and September 2018. The portable litter fencing was in place near the working face. Two employees were picking up litter at the time of the inspector's arrival.</p> <p>140.A.10 - Odors and vectors – No vector issues noted.</p> <p>The following ongoing odor control mechanisms and procedures were observed:</p> <ol style="list-style-type: none"> 1. - Active gas extraction system (Initiated August 2, 2016) - The high capacity blower/flare was in operation. LF gases are being drawn from LF gas extraction probes on Phase III and incinerated. 2. - Posi-Shell/Interim odor control/ Daily Cover (Initial application June 16, 2016) –The facility has ceased applying the Posi-Shell cover to the northern and western side slopes of the Phase III waste cell to assist in odor control due to the plan to place final cover over this area this fall. The facility continues to maintain this area. Areas where the Posi-Shell degraded or eroded are regraded and seeded. 3. - Odor Boss Canon (Portable roll-off mounted misting unit - Initiated March 25, 2016) - The unit was in place at the active Phase IV working face and discharging the deodorizing spray toward the working face. 4. - 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 6x12 (approx.) 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. 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 practice of elevating the pH level of WWTP sludge received by the facility has continued. WWTP sludge generated by the City of Lynchburg is divided between the Region 2000 SLF, the Amelia SLF, and permitted land applications. The facility discontinued spraying the sludge with the water based deodorizing spray when off loaded at the working face due to the spray only contacting the outer surface of the deposited sludge. In place of this practice, the odor canon, positioned at the active working face, applies deodorizing spray to all waste and activities at the working face. This practice was initiated following the July 2, 2018 focused compliance inspection. <p>140.A.12 – The facility has installed an automatic truck wash system to clear mud from trucks. The facility's water truck is used to wet down roadways.</p> <p>140.A.13 - Internal roads were well maintained and allowed access to all active areas of the facility and monitoring locations.</p>
20-81-140.B	<p>Compaction, cover & working face - The facility continues to maintain a three day soil stock pile near, or easily accessible to, the active working face for daily cover and for after-hours fire control.</p> <p>140.B.1.a – The working face was located along the southern edge of Phase IV. Compaction resumed with the completion of the initial lift of Phase IV.</p> <p>140.B.1.b – The lift appeared to be approximately 10 feet thick.</p> <p>140.B.1.c – Soil and Posi-Shell are used for daily cover during the work week. Daily cover appeared to be sufficient. Soil only daily cover continues to be applied over the weekends.</p> <p>140.B.1.d – Repairs to Phase III intermediate cover, run-off controls and sideslopes from the August 2, 2018 flash flood were completed. Grading and seeding work were continuing on the upper southern slope of Phase III</p>

	140.B.2 – The active working face at Phase IV was reasonably sized for the volume of waste received. 140.B.4-5 - No unauthorized waste or white goods were observed in the working face.
20-81-610-660	Special Waste - Special waste forms – Special waste disposal forms were reviewed for July and August 2018. Tires – Two loads of tires were hauled to Emanuel Tire on August 30, 2018. The loads contained a cumulative total of 8.66 tons. Whitegoods/Metals – Two loads of whitegoods and scrap metal were hauled to a recycler on August 21, 2018. The loads contained a cumulative total of 7.61 tons.
20-81-160	Closure requirements - The process for the partial closure of Phase III is continuing. The facility held a pre-bid meeting on October 31, 2018 (the same day as this inspection). Closure construction is anticipated to begin in December 2018.
20-81-200.A,B,E	Decomposition gas concentrations, monitoring & recordkeeping - 200.A – The fourth quarter gas monitoring event for 2018 was conducted on October 16, 2018. No exceedances of the lower explosive limit (LEL) or levels reaching the 80% action level for methane were reported at gas boundary probes. No methane gas levels were reported requiring action in facility structures. 200.E – The quarter monitoring report was reviewed at Mr. Arthur'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. 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 August and September 2018. There was one complaint received in August and one complaint received in September related to odors. The facility continues to follow up on odor complaints.
20-81-210	Leachate control - The facility provided the Leachate Flow Meter Readings chart for December 2017 through September 2018. No leachate outbreaks were observed at the active waste cell or at the leachate tank and pump station. 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.

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	46050020133	12/31/2018
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.