



# 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

July 31, 2018

*Sent via electronic mail*

Mr. Clarke Gibson  
Region 2000 Service Authority  
361 Livestock Road  
Rustburg, Virginia 24588  
[cgibson@region2000.org](mailto:cgibson@region2000.org)

### **NO DEFICIENCY LETTER**

Re: Region 2000 Livestock Road Regional Landfill - Campbell Co. VA – SWP610  
Unannounced Focused Compliance Inspection

Dear Mr. Gibson:

On July 2, 2018, 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 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](mailto: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

**Permit:** SWP610

**Region:** Blue Ridge

**Inspection Type:** Focused Compliance Inspection

**Facility Staff:** Robert Arthur, Region 2000 Environmental Compliance and Safety Manager, and Licensed Landfill Operator, and Larry "Buzz" Hall, Region 2000 Operations Manager, and Licensed Landfill Operator

**Inspector:** Douglas Foran

**Inspection Date:** 7/2/2018

**Approximate Arrival Time:** 8:00 am

**Inspection Method:** Unannounced

**Exit Interview:** Yes

**Weather Conditions:** Weather conditions at 7 am were: Sunny - Temp. 74 - Humidity 92% - Winds calm - BP 30.06. The temperature climbed to 77 at 8 am and some clouds were drifting in.

**Comments:** As a follow up to Mr. Jon Hardie's odor complaints of June 29 and June 30, Doug Foran, DEQ Solid Waste Inspector, conducted an odor check of the Poplar Ridge sub-division, Calohan Rd. from Foster's Fuels (Rt. 29) to Colonial Hwy., and Colonial Hwy. from its intersection with Calohan Rd. to the Rustburg Ruitan Club just outside Rustburg from 7:10 am to 8 am on July 2, 2018.

Mr. Foran contacted Robert Arthur, Region 2000 Environmental Compliance and Safety Manager, at 8:07 am, and met him at the Region 2000 SLF office a few minutes later. Mr. Arthur was also conducting an odor check on Calohan Rd. at approximately 8 am. Mr. Foran requested and was granted access to the SLF site to view the odor control system and conduct a focused compliance inspection.

Prior to viewing the site Mr. Arthur reported:

- He received Mr. Hardie's emails on Saturday morning and contacted the facility's operations crew at 9:20 am on Saturday to discuss operations and note any issues. He was informed all odor controls were in operation and cover procedures would be followed.
- Friday's daily cover consisted of soil.
- The WWTP sludge produced by COL is still being split between the Amelia SLF (approximately 1/3 of sludge produced), Region 2000 (approximately 1/3 produced), and land application (1/3 produced). Mr. Arthur could not confirm if a load of sludge was delivered on Saturday morning due to Region 2000 phone and Internet being out of service.
- No part of the odor control system was down on Friday or Saturday. The permanent Byers system and active gas extraction system run continuously. The Byers portable system (trailer mounted) and Odor Canon operate when operations staff is onsite.

Following the site visit, Mr. Arthur and Mr. Foran met with Larry "Buzz" Hall, Region 2000 Operations Manager. Mr. Hall explained that he and the operations staff were very aware of the odor issue and impact on the surrounding neighborhoods and that is taken into consideration in planning day to day landfill operation.

Mr. Foran concluded the focused inspection at approximately 9:30 am.

## Sanitary Landfill (Active)

Reference	Description	SL	Result
<b>Compliance Area: Operator Information</b>			
10.1-1408.1	Disclosure Statement	I	
10.1-1408.2	Operator Certification	II	
<b>Compliance Area: Recordkeeping, Reporting &amp; Permit</b>			
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	
<b>Compliance Area: Design, Construction &amp; Operation</b>			
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	
<b>Compliance Area: Closure &amp; Post-Closure Care</b>			
20-81-160	Closure requirements	II	
20-81-170	Post-closure care requirements	II	
<b>Compliance Area: Decomposition Gas Control</b>			
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	✓
<b>Compliance Area: Leachate Control</b>			
20-81-210	Leachate control	II	
<b>Compliance Area: Groundwater Monitoring</b>			
20-81-250	Groundwater monitoring program	II	
20-81-260	Corrective action program	II	
<b>Compliance Area: Landfill Mining</b>			
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.9-13	<p>Hazard and nuisance control - 140.A.10 - Odors - The following ongoing odor control mechanisms and procedures were observed:</p> <ol style="list-style-type: none"> <li>1. Active gas extraction system (Initiated August 2, 2016) - The high capacity blower/flare was in operation at the time of the inspection. LF gases are being drawn from LF gas extraction probes on Phase III and incinerated. No disconnected or broken connections were seen in the wells, connections, or pipeline in the system.</li> <li>2. Odor Boss Canon (Portable misting unit - Initiated March 25, 2016) - The unit was in place along the eastern side of Stage IV at the time of the inspection and was directing a deodorizing spray over the working face area.</li> <li>3. Byers Vapor System (Stationary perimeter system - Initiated March 16, 2016) – Both the original primary system and the portable trailer mounted extension system were in operation. The primary system was operational along the western (Poplar Ridge) and southern (facing Rt. 24 - Colonial Highway) cell slopes along Phase III. The new extension system covers approximately 800 feet of the southern boundary of Phase IV. Discharge of the odor control agent was checked for both systems. Both systems were dispersing the odor control agent.</li> <li>4. 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.</li> <li>5. WWTP Sludge (Initiated June 18, 2015) - WWTP sludge generated by the City of Lynchburg is divided between the Region 2000 SLF, the Amelia SLF, and permitted land applications.</li> </ol>
20-81-140.B	<p>Compaction, cover &amp; 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 eastern section of Phase IV. With the initial lift of Phase IV completed compaction with the Aljohn compactors has resumed.</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. A soil cover was applied over all Phase IV areas except for the daily active working face. A small area of exposed waste was observed at the NE corner of the cell. This waste runs along the edge of the liner system and a setback to avoid damaging the liner system during the placement of the first lift of waste was</p>

	allowed by DEQ.
	140.B.2 – The active working face was reasonably sized for the volume of waste received.
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. DEQ staff will review the entire odor complaint log during the upcoming fourth quarter inspection. DEQ also maintains a complaint log of odor complaints received by DEQ. For the month of June 2018, DEQ received three odor complaints regarding SWP610. The first was sent by Mr. Jon Hardie on June 2, 2018. The second and third were also by Mr. Hardie on June 29th and 30th, respectively.

### 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	11/30/2017
Elliott Inge	4605002580	7/31/2019
Kenneth Jarman	4605002635	11/30/2017
Larry P. Hall	46050020133	12/31/2018
Robert Arthur	4605002613	3/31/2018

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.