



COMMONWEALTH of VIRGINIA

Molly Joseph Ward
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

October 6, 2017

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
Unannounced Focused Compliance Inspection

Dear Mr. Gibson:

On September 26, 2017, 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.

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

Inspection Type: FCI - Complaint Received

Facility Staff: Facility personnel – Clarke Gibson, Director of Solid Waste and Licensed Landfill Operator, Robert Arthur, Environmental Compliance Coordinator and Licensed Landfill Operator

Other DEQ Staff: Lauren Pillow (Hazardous Waste Inspector)

Inspector: Douglas Foran

Inspection Date: 9/26/2017

Approximate Arrival Time: 8:00 am

Inspection Method: Unannounced

Exit Interview: Yes

Weather Conditions: Partly cloudy – Winds NNE at 7 mph – BP 29.97 – Ground conditions Dry

Comments: Doug Foran, Solid Waste Inspector, was accompanied by Lauren Pillow, Hazardous Waste Inspector, to the Region 2000 Livestock Road SLF and the surrounding area to follow up on an odor complaint received on September 23, 2017 (Saturday) at 8:11 am. DEQ staff arrived in the area at approximately 7:00 am on Tuesday, September 26, 2017, and conducted checks on Calohan Rd., from Rt.29 to Colonial Highway (Rt. 24), Colonial Highway, from its intersection with Calohan Rd. to Rustburg, and the Poplar Ridge sub-division. No LF related odors were noticed by DEQ staff. A site visit was conducted at the landfill following the check of the surrounding area.

DEQ staff departed the facility at 10:00 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	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.9-13	<p>Hazard and nuisance control - 140.A.10 - Odors</p> <p>In addition to the odor management systems and practices in place, the facility is nearing completion on the final lift on Phase III. The western section of the Phase III cell, nearest Poplar Ridge sub-division, is complete and at final elevation. The facility constructed the final waste lift east across the Phase III waste cell working away from the sub-division. (See additional comments under 20-81-140.B.1.a - Compaction, cover & working face.)</p> <p>The following ongoing odor control mechanisms and procedures were observed:</p> <p>Active gas extraction system (Initiated August 2, 2016) - The high capacity blower/flare was in operation.</p> <p>Posi-Shell/Interim odor control/ Daily Cover (Initial application June 16, 2016) –Facility employees have taken over maintenance and reapplication of the material as needed. The Posi-Shell cover over the intermediate cover was intact.</p> <p>Odor Boss Canon (Portable misting unit - Initiated March 25, 2016) - The portable unit was not operation at the time DEQ staff arrived. Mr. Arthur reported it had broken down the prior afternoon. A local repair crew was onsite and completed the repair before DEQ left the site at 10:00 am. The Odor Canon was located at the active working face in Phase IV along the southern edge of the waste cell.</p> <p>Byers Vapor System (Stationary perimeter system - Initiated March 16, 2016) - The system was operational along the western (Poplar Ridge) and southern (facing Rt. 24 - Colonial Highway) cell slopes.</p> <p>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>
20-81-140.B	<p>Compaction, cover & working face - 140.B.1.a – The working face was located along the southern edge of Phase IV. Phase III is near completion and there is limited space left in that phase. Available area remaining in Phase III is on the eastern section, which is the greatest distance from the Poplar Ridge sub-division. Waste, in the Phase IV active cell, was spread into a thin layer and lightly compacted into place with track equipment. Compaction was minimal due to this being the first lift of waste placed in the cell (fluff layer) to protect the leachate collection system and liner.</p> <p>140.B.1.b – The Phase IV fluff layer 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 the entire area where waste was placed in Phase IV, with the exception of the active working face. Soil only daily cover continues to be applied over the weekend. The waste in Phase III has a soil cover applied.</p> <p>140.B.1.d – Intermediate cover was in process of being applied to Phase III. Seeding is planned for this fall after intermediate cover is applied.</p> <p>140.B.2 – The active working face was reasonably sized for the volume of waste received.</p> <p>140.B.4 – No unauthorized waste was observed in the working face.</p> <p>140.B.5 – No white goods were observed in the working face.</p>
20-81-200.D	<p>Decomposition gas-odor management - 200.D.1 – The facility follows the updated Odor Management and Control Plan (OMCP), dated June 17, 2016. The updated OCMP replaces the previous November 10, 2011 plan. Odor control strategies are given in Section 3.0 through 3.9 – Strategies for Controlling Odors.</p> <p>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 September 2017. To date, for September 2017, the facility documented 8 odor complaints. All the odor complaints on file at the facility were from the Calohan Rd. area. The facility continues to follow up on odor complaints. The complaints documented by the facility closely match the complaints received and logged by DEQ. To date, DEQ also logged 8 odor complaints, which were all from Calohan Rd.</p>

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

Disclosure Statement Last Updated: 3/31/2017

Waste Management Facility Operators

Licensed Operator	License #	Expiration Date
Clarke Gibson	4605003027	11/30/2017
Diane Dodd	4605002034	8/31/2018
Elliott Inge	4605002580	7/31/2019
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.