



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

September 18, 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 – Solid Waste Permit (SWP) 610
Announced Compliance Inspection – August 15, 2019

Dear Mr. Gibson:

On August 15, 2019, 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, 9VAC20-81-10 *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
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: Compliance Evaluation Inspection

Facility Staff: Mr. Robert Arthur, Environmental Compliance Coordinator

Inspector: Nicole Tilley

Inspection Date: 8/15/2019

Approximate Arrival Time: 9:00 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 dry.

Comments: On August 15, 2019, 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. DEQ departed at approximately 2:30 p.m.

The facility has completed the closure construction of the western portion of the Phase III Landfill. The facility plans on seeding the area next month.

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 | 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. Monthly totals for June and July are provided below.</p> <p>Period: Daily Average: Total Tonnage June: 743.28 tons: 16,723.71 tons July: 728.47 tons: 17,483.30 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>June: 49 inspections for 3,761 loads July: 52 inspections for 3,839 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 March 28, April 30, May 30, June 25, July 15, 2019. No major issues were noted in the self-inspection reports 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 14, 2018.</p> |
| 20-81-530 | <p>Permittee recordkeeping and reporting - - B. All required records were made available to DEQ upon request.</p> <p>C. On June 11, 2019, facility personnel observed significant rill erosion on the western and northern side slopes of Phase III landfill where closure construction activities had been taking place. Soil had migrated from the slopes and discharged into a wetlands preservation area due to severe storm the prior evening. The sediment-affected area is estimated to cover approximately 0.04 acres of wetlands with a maximum depth of 3 inches of soil. The facility provided a 24-hour notification by email to DEQ the same day it was discovered. A written 5-day notification was received June 14, 2019. DEQ's water division conducted a follow up site visit on June 18, 2019.</p> <p>On August 2, 2019, facility personnel observed another discharge of sediment from the Phase III landfill into wetlands. Soil had migrated from the slopes and discharged into two wetlands preservation areas due to severe storm the prior evening. The first affected area is located on the northwest corner of Phase III and estimated to cover approximately 8,000 to 10,000 square feet of wetlands with sediment depths ranging from trace to a maximum depth of 3 inches of soil. The second affected area is located on the corner of Phase III and Phase IV (north side of the landfill) and estimated to cover approximately 6,200 square feet of wetlands with sediment depths ranging from trace to a maximum depth of 2 inches of soil with some paper and plastic litter. The facility provided a 24-hour notification by email to DEQ the same day it was discovered. A written 5-day notification was received August 7, 2019. The facility removed the litter from the second affected wetlands area and is working with DEQ's water division for further instructions and guidance.</p> <p>Please see additional comments under 9VAC20-81-140.A.7.</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 - - No leachate or solid waste was observed entering surface waters or wetlands.</p> |

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|---------------------|--|
| 20-81-140.A.7 | <p>Stormwater control system maintenance - - The stormwater control features appeared to be in good condition and working as intended. The stormwater conveyance system was free of obstructions with no signs of erosion or ponding water. The sediment basins had sufficient wet storage capacity.</p> <p>The facility has put additional stormwater controls in place to divert stormwater and capture sediment and run-off from the Phase III landfill where closure construction activities had been occurring. The facility is working with the DEQ water division for further instructions and guidance.</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. No issues regarding blown litter were observed.</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. - 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 road ways were observed.</p> <p>A.13. Internal roads were well maintained and allowed access to all areas of the facility.</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 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 with good compaction. Soil is stockpiled near the working face and intermediate cover appeared to be in good condition.</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. Gas Concentrations - The second and third quarter 2019 landfill gas monitoring events were conducted on April 11, 2019 and August 9, 2019. No exceedances of the 100% compliance level for methane or the 80% 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. Gas Monitoring - Facility conducts quarterly landfill gas monitoring.</p> <p>E. Record keeping - The second and third quarter 2019 monitoring event reports were provided for review. All required information was recorded.</p> |

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| 20-81-200.D | <p>Decomposition gas-odor management - -</p> <p>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.</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. The facility continues to follow up on odor complaints.</p> |
| 20-81-210 | <p>Leachate control - -</p> <p>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>No leachate seeps were observed on the side slopes of the active cells or cells under intermediate cover.</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.