



COMMONWEALTH of VIRGINIA

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January 14, 2016

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

NO DEFICIENCY LETTER

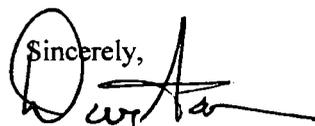
Re: Livestock Road Regional Landfill – SWP610 Campbell Co.
Unannounced Compliance Inspection – December 9, 2015

Dear Mr. Gibson:

On December 9, 2015, staff from the Virginia Department of Environmental Quality's Blue Ridge Regional Office and Central Office conducted an 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, Virginia Solid Waste Management Regulations (VSWMR, 9VAC20-81-10, et seq) and SWP610.

During the inspection, no apparent violations of your permit, or the VSWMR were observed. A copy of the inspection checklist is enclosed.

If you have any questions, please contact me at (434) 582 - 6226 or Douglas.Foran@deq.virginia.gov.

Sincerely,

Doug Foran
Solid Waste Inspector

Copy: Robert Arthur, Region 2000
DEQ - BRRO ECM Solid Waste Files

Sanitary Landfill [SW]
Inspection Report

Facility Name: Region 2000 Regional Landfill - Livestock Rd Fac
Region: South Central Regional Office
Inspected By: Foran, Douglas A

Permit No.: SWP610
Inspection Date: 09-DEC-15

Reference	Description	S	I	A	V	O
10.1-1408.1	Disclosure Statement	I	X			0
10.1-1408.2	Operator Certification	II	X			0
20-70-10 et seq.	Financial Assurance	II				0
20-90-10 et seq.	Permit Action Fees	II				0
20-81-80	Waste Assessment Program	I				0
20-81-100.B	Compliance with the facility's permit	II	X			0
20-81-100.E	Unauthorized waste program and inspection	II	X			0
20-81-130	Facility design / construction	I				0
20-81-140.A.1,4	Safety and fire control	II	X			0
20-81-140.A.6	Pollutant discharge	III	X			0
20-81-140.A.7	Stormwater control system maintenance	II	X			0
20-81-140.A.8,14-15	Facility operation, maintenance, and training	II	X			0
20-81-140.A.9-13	Hazard and nuisance control	I	X			0
20-81-140.A.16	Facility self inspections	I	X			0
20-81-140.A.17	Record maintained of waste received and processed	I	X			0
20-81-140.B	Compaction, cover & working face	I	X			0
20-81-160	Closure requirements	II				0
20-81-170	Post-closure care requirements	II				0
20-81-200.A,B,E	Decomposition gas concentrations, monitoring & recordkeeping	II	X			0
20-81-200.C	Decomposition gas-remediation	III				0
20-81-200.D	Decomposition gas-odor management	I	X			0
20-81-210	Leachate control	II	X			0
20-81-250	Groundwater monitoring program	II				0
20-81-260	Corrective action program	II				0
20-81-485	Operations Manual	II	X			0
20-81-530	Permittee recordkeeping and reporting	II				0
20-81-610-660	Special Waste	II	X			0

S = Severity Level I = Inspected A = Area of concern V = Alleged violation O = Occurrences

**Sanitary Landfill [SW]
General Comments**

Reference	Comments															
10.1-1408.1	Disclosure Statement (DS) - The key personnel list was confirmed by facility staff.															
10.1-1408.2	Operator Certification - The Region 2000 Service Authority has 9 licensed operators on staff. All operator's licenses, with the exception of Clark Gibson's license, were current.															
20-81-100.B	<p>Compliance with the facility's permit - The facility provided the following total monthly tonnages and daily average tonnages for August through November 2015.</p> <table border="0" style="margin-left: 40px;"> <thead> <tr> <th></th> <th align="right">Total tonnage</th> <th align="right">Daily average tonnage</th> </tr> </thead> <tbody> <tr> <td>August.....</td> <td align="right">19,130.58.....</td> <td align="right">735.80</td> </tr> <tr> <td>September.....</td> <td align="right">17,500.66.....</td> <td align="right">673.11</td> </tr> <tr> <td>October.....</td> <td align="right">18,933.79.....</td> <td align="right">701.26</td> </tr> <tr> <td>November.....</td> <td align="right">16,318.19.....</td> <td align="right">679.93</td> </tr> </tbody> </table> <p>Section II.C of Permit Module II - Conditions of Operation - states that the landfill is limited to a daily disposal limit of 2580 tons/day.</p>		Total tonnage	Daily average tonnage	August.....	19,130.58.....	735.80	September.....	17,500.66.....	673.11	October.....	18,933.79.....	701.26	November.....	16,318.19.....	679.93
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20-81-100.E	<p>Unauthorized waste program and inspection - The facility has its operating hours posted at the front gate. A sign identifying unauthorized wastes is posted prior to the scalehouse. Sufficient random load inspections were documented to meet the 1% requirement for August, September, October and November 2015.</p> <table border="0" style="margin-left: 40px;"> <thead> <tr> <th>Month.....</th> <th>Inspections conducted.....</th> <th>Loads received</th> </tr> </thead> <tbody> <tr> <td>August.....</td> <td align="right">49.....</td> <td align="right">3708</td> </tr> <tr> <td>September.....</td> <td align="right">47.....</td> <td align="right">3463</td> </tr> <tr> <td>October.....</td> <td align="right">49.....</td> <td align="right">3605</td> </tr> <tr> <td>November.....</td> <td align="right">42.....</td> <td align="right">3110</td> </tr> </tbody> </table> <p>The annual unauthorized waste screening training was conducted on January 21 and 22, 2015.</p>	Month.....	Inspections conducted.....	Loads received	August.....	49.....	3708	September.....	47.....	3463	October.....	49.....	3605	November.....	42.....	3110
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20-81-140.A.1,4	<p>Safety and fire control</p> <p>140.A.1 - Safety meeting minutes for August 13, through December 3, 2015 were reviewed. Materials presented and sign-in sheets listing subject, date, instructor, location and attendees were provided.</p> <p>140.A.4 - No indication of open burning of waste was found.</p>															
20-81-140.A.6	<p>Pollutant discharge - No leachate, pollutants or other solid waste as described under subsections 140.A.6.a through 140.A.6.d were observed entering surface waters or wetlands at the facility.</p>															
20-81-140.A.7	<p>Stormwater control system - The facility's sediment basin was retaining stormwater. Stormwater ditch lines were open. Stormwater ditch lines along the eastern toe of the landfill cell slope were being cleared of sediment.</p>															
20-81-140.A.8,14-15	<p>Facility operation, maintenance, and training</p> <p>140.A.8 - Access to the facility is controlled by the main gate, fencing and natural barriers.</p> <p>140.A.15 - Sufficient equipment and trained operators were onsite operating the landfill. The facility had an Aljohn compactor, a Cat 973 track loader, a 963 track loader and a Cat scraper pan in operation at the landfill placing and compacting waste and applying intermediate cover to the northern cell slope. The facility had additional equipment available for use.</p>															
20-81-140.A.9-13	<p>Hazard and nuisance control</p> <p>140.A.9 - Weekly litter cleanup was documented for August through November 2015. Blowing litter was observed on the southeast slope of the waste cell. Three people were picking up litter.</p> <p>140.A.10 - The facility's odor complaint log for August through November 2015 was reviewed. The facility documented 29 odor complaints in August, 37 complaints in September, 57 complaints in October and 113 complaints in November. Mr. Arthur continues to follow up on odor complaints.</p> <p>The facility provided a written summary of odor control measures to DEQ, dated August 11, 2015. Measures were reviewed with Mr. Arthur.</p> <p>The Leachate Cleanout Landfill Gas System/Flare - The system was in operation. The facility stated operation of this system began on June 15, 2015. The inspector observed the blower and gas flare to be in operation burning off collected gases.</p> <p>Misting system - The trial misting system continues to be in limited operation and was only in place along the western slope of the landfill and part of the southern slope of the landfill. Mist nozzles were emitting a</p>															

**Sanitary Landfill [SW]
General Comments**

Reference	Comments
	<p>deodorizing spray on 1 1/2 minute intervals. The facility states this system began operation on July 17, 2015.</p> <p>Portable misting "canon" - One of two units was in operation. This unit discharges deodorizing spray at localized areas such as the working face.</p> <p>Posi-Shell/Alternate Daily Cover - The misting system deodorizer is mixed with the Posi-Shell to attempt to control odors from the daily working face.</p> <p>Water Truck Dust Control - The deodorizing agent used in the mist spray is added to the facility's water truck which is used to wet down facility roads.</p> <p>PH Level of WWTP Sludge - The pH level of WWTP sludge received by the facility has been increased effective June 18, 2015.</p> <p>Seagulls were at the working face.</p>
20-81-140.A.16	<p>140.A.13 - Internal roads were well maintained and allowed access to all active areas of the facility.</p>
	<p>Facility self inspections - The facility performed monthly self inspections on August 28, September 23, October 30, and November 25, 2015. Reports were complete.</p>
20-81-140.A.17	<p>Record maintained of waste received and processed - The facility creates tickets for individual waste loads and maintains records of waste type and tonnage.</p>
20-81-140.B	<p>Compaction, cover & working face</p> <p>140.B.1.a - Waste was being spread into a thin layer over the active working face and being compacted into place.</p> <p>140.B.1.b - Lifts appeared to be approximately 10-12 feet in height.</p> <p>140.B.1.c - The facility was placing waste on the southwest end of Phase III moving toward Poplar Ridge sub-division. Posi-Shell and soil had been used for daily cover. Daily cover appeared sufficient.</p> <p>140.B.1.d - Intermediate cover was being applied to recent working faces on the northern face of the waste cell at the time of the inspection. Soil cover of all outer slopes was intact with no waste penetrating. Seeding had been conducted on areas that had previously received intermediate cover and grass seed had germinated.</p> <p>140.B.2 - The active working face appeared to be reasonably sized for the volume of waste received.</p> <p>140.B.4 - One load of WWTP sludge was stockpiled at the working face before being worked into the active working face.</p> <p>140.B.5 - No white goods were observed in the working face.</p>
20-81-200.A,B,E	<p>Decomposition gas concentrations, monitoring & recordkeeping</p> <p>200.A - Fourth quarter 2015 landfill gas (LFG) monitoring was conducted on November 6, 2015. No exceedances of the lower explosive limit (LEL) or levels reaching the 80% action level for methane were reported at gas boundary probes BP-01 through BP-319. No methane gas levels were reported requiring action in the facility's scale house or maintenance building.</p> <p>200.E - The fourth quarter monitoring report was reviewed at the facility's office/scale house. All information required on the report was complete.</p>
20-81-200.D	<p>Decomposition gas-odor management</p> <p>200.D.1 - The BRRO continues to receive odor complaints from residents of the Poplar Ridge sub-division and Calohan Rd. The facility and their consultant have reviewed the facility's Odor Management and Control Plan (OMCP), dated November 10, 2011, as stated in Section 5.1 of the OMCP and have enacted the measures described to attempt to address odors from the landfill site.</p> <p>200.D.2 - The OMCP (Section 4.4) identifies the Environmental Compliance and Safety Manager or the Operations Manager as facility contacts for odor complaints. Complaints received at the BRRO continue to be forwarded to the appropriate facility staff and complainants have been provided contact information for the facility and informed to notify the facility directly as well as contacting the BRRO.</p>
20-81-210	<p>Leachate control - The facility provided the Leachate Flow Meter Readings chart for January through November 30, 2015.</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>

**Sanitary Landfill [SW]
General Comments**

Reference	Comments
	No leachate outbreaks were observed at the active Livestock Road facility or in the area around the leachate tank and pumping station.
20-81-485	Operations Manual - The facility was reminded during the inspection that it must review, update, and certify its Operations Manual annually. The 2014 certification statement was dated December 17, 2014 and signed by Clarke Gibson, P.E.
20-81-610-660	Special Waste - 20-81-610-660 640 - Tire management - Two loads of tires were hauled to Emanuel Tire in Appomattox on October 27 and October 28, 2015. Cumulative tonnage of the two loads was 11.81 tons. 650 - White goods management - One load of white goods/metals was hauled to CA Recycling on October 28, 2015, containing 3.44 tons of scrap metal.

Overall Inspection Comments

Inspection type - Unannounced Compliance Evaluation Inspection (CEI)
DEQ arrival - December 9, 2015 - 8:50 am
DEQ staff - Doug Foran, SW Inspector
Facility personnel - Robert Arthur, Environmental Compliance Coordinator and Licensed Landfill Operator and Larry Hall, Operations Manager and Licensed Landfill Operator.
Exit interview - Conducted with Robert Arthur
DEQ departure - 12:30 pm
Weather conditions - Foggy, very low visibility, 44 F.

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 these 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.