



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

February 7, 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
Unannounced Compliance Inspection

Dear Mr. Gibson:

On January 23, 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: 1/23/2018

Region: Blue Ridge

Approximate Arrival Time: 8:45 am

Inspection Type: Compliance Evaluation Inspection

Inspection Method: Unannounced

Facility Staff: Greeted by Clarke Gibson, Director of Solid Waste and Licensed Landfill Operator, and Robert Arthur, Environmental Compliance Coordinator and Licensed Landfill Operator. Inspection conducted with Mr. Arthur.

Exit Interview: Yes

Weather Conditions: Sunny following early morning rainfall - Wind 10 mph from S – 60 F – BP 29.64 - Ground conditions wet

Comments: DEQ inspector departed the site after completing the inspection at approximately 11:20 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	
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SL = Severity Level

✓ = In Compliance

X = Alleged Violation

N/A = Not Applicable

Blank = Not Inspected

General Comments

Reference	Comments
10.1-1408.1	Disclosure Statement - An update to the disclosure statement was provided on January 12, 2018, following the passing of Dianne Dodd.
20-81-80	Waste Assessment Program - The annual Solid Waste Information and Assessment (SWIA) report is due no later than March 31. This is an annual reporting requirement applicable to facilities treating, storing, transferring, or disposing of solid waste. Information about SWIA and instructions can be accessed at: http://www.deq.state.va.us/Programs/LandProtectionRevitalization/SolidHazardousWasteRegulatoryPrograms/SolidWaste/SolidWasteInformationandAssessmentProgram.aspx Your SWIA contact is Nicole Tilley. If you have any questions or need your facility PIN, you may reach her at Nicole.Tilley@deq.virginia.gov or by phone at (540) 562-6740.
20-81-100.B	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 daily average tonnages for November and December 2017. Month.....Daily average tonnage Nov.646.41 Dec.592.01
20-81-100.E	Unauthorized waste program and inspection - 100.E.1 - The facility posted its operating hours at the front gate. A sign identifying unauthorized wastes is posted prior to the scale house. 100.E.1 - Annual retraining for unauthorized waste recognition was conducted on January 23, 2018. 100.E.5 - Sufficient random load inspections were documented to meet the 1% requirement for November and December 2017. The facility does not receive out of state waste. Month.....Inspections conducted.....Loads received Nov.44.....3288 Dec.42.....3091
20-81-140.A.16	Facility self inspections - The facility performed monthly self-inspections for November and December 2017. 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 - Facility staff provided an Operations Manual Certification, dated December 15, 2017, and signed by Clarke Gibson, P.E., Region 2000, Director of Solid Waste. The certification meets the requirements of this section.
20-81-530	Permittee recordkeeping and reporting - 530.B - All required records were maintained at the facility and available to DEQ staff at the time of the inspection. 530.C.3 - No 24 hour or 5 day notifications have been provided since the previous inspection on November 8, 2017.
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	Safety and fire control - 140.A.1 – Safety meeting records for November 2, through December 28, 2017 were reviewed. Records included the materials presented, and sign-in sheets, which listed the meeting's topic, date, instructor, location, and attendees. 140.A.4 – No indication of open burning of waste was found.
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	Stormwater control system maintenance - Stormwater controls, including ditch lines, check dams, sediment basins, and run-off controls for the Phase III and Phase IV waste cells were in place and in good repair. No indication of stormwater bypassing the stormwater system was found.
20-81-140.A.8,14-15	Facility operation, maintenance, and training - 140.A.15 – Sufficient equipment and trained operators were present at the facility. A Cat D-6 dozer and a Cat 963 track loader were in operation at the active working face. Two Aljohn compactors were available for use, but due to the facility still placing the initial layer of waste on Phase IV, use of the compactors is limited to prevent possible damage to the liner or leachate collection system. The facility's water truck was in use for dust control on the facility's paved roads.

20-81-140.A.9-13	<p>Hazard and nuisance control - 140.A.9 - Weekly litter cleanup was documented for November and December 2017. The portable litter fencing that was being assembled during the previous inspection was in place at the working face. Two employees were conducting litter pickup at the time of the inspection.</p> <p>140.A.10 - Odors and vectors – Seasonal seagulls were observed at the active working face.</p> <p>As noted in the November 8, 2017 inspection report, the facility moved the active working face to Phase IV. (See additional comments under 20-81-140.B.1.a - Compaction, cover & working face.) 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 at the time of the inspection. LF gases are being drawn from LF gas extraction probes and leachate clean-outs on Phase III and incinerated. 2. 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 on the northern and western side slopes of the Phase III waste cell to assist in odor control. Some minor erosion damage was observed. Mr. Arthur explained that will be addressed as soon as weather and soil conditions on the waste cell slopes allow. 3. Odor Boss Canon (Portable misting unit - Initiated March 25, 2016) - Facility staff notified DEQ on November 1, 2017, that they intended to winterize the unit (drain and take out of service) to prevent damage during the winter months. The unit will be brought back into service when freezing temperatures end in the spring of 2018. The unit was in storage at the time of the inspection. 4. Byers Vapor System (Stationary perimeter system - Initiated March 16, 2016) - The primary system was operational along the western (Poplar Ridge) and southern (facing Rt. 24 - Colonial Highway) cell slopes. The extension to this system to cover approximately 800 feet of the southern boundary of Phase IV has arrived on site and is available for use (January 2018). The new extension system is a stand alone, self-contained system mounted on a 6x12 (approx.) utility trailer. The trailer carries the power generator, Byers odor control solution tank, mixing chamber, blower unit, and vapor pipeline. 5. Leachate Clean-out 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 has temporarily discontinued spraying the sludge with the water based deodorizing spray during the winter months, due to the equipment's tendency to freeze and burst lines. The practice will resume in the spring of 2018. <p>140.A.13 - Internal roads were well maintained and allowed access to all active areas of the facility.</p>
20-81-140.B	<p>Compaction, cover & working face - The facility continues to maintain a three day soil stockpile 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 SW corner of Phase IV. Due to the waste being placed in the initial lift of Phase IV (fluff layer), waste was spread into a thin layer and lightly compacted into place with track equipment. This is done to protect the leachate collection system and liner.</p> <p>140.B.1.b – The Phase IV fluff layer lift appeared to be approximately 6-8 feet thick.</p> <p>140.B.1.c – Soil and Posi-Shell are used for daily cover. A soil cover was applied over the area where waste was placed in Phase IV, with the exception of the active working face and toe of the waste which sets on the gravel drainage layer. Soil only daily cover continues to be applied over the weekend. During the November 8 inspection some exposed waste was observed along the toe of the fluff layer where it meets the gravel drainage layer. The facility addressed this by applying additional cover soil to with approximately 18-24 inches of the gravel drainage layer to prevent clay soil particles or the bentonite component of Posi-Shell from clogging the gravel drainage layer which could prevent leachate from reaching the leachate collection system.</p> <p>140.B.1.d – The process of applying intermediate cover to Phase III has been slowed by winter weather. Applying the intermediate cover and removing and covering flagging waste should be completed as soon as conditions allow. The installation of the six additional gas extraction wells on the side slopes of Phase III disrupted some cover and seeding.</p> <p>140.B.2 – The active working face was reasonably sized for the volume of waste received.</p> <p>140.B.4-5 - No unauthorized waste or white goods were observed in the working face.</p>
20-81-610-660	<p>Special Waste - 620 - Asbestos containing material (ACM) - Region 2000 Special Waste Disposal Request forms for receiving ACMs and other special waste were reviewed for November and December 2017.</p> <p>640 - Tire management – Three loads of tires have been hauled since the November 8 inspection. Two loads were hauled to Emanuel Tire on November 30, 2017 and one load was hauled on January 4, 2018. The facility contacted DEQ in regard to utilizing tires to hold down a rain covering for the Phase IV waste cell prior to construction of the waste cell. With Phase IV in operation, tires are beginning to be pulled from the rain cover which over time will create a significant number of tires onsite for disposal. The facility should keep the number of tires that have been removed from the rain cover and stored onsite below its permitted limit.</p> <p>650 - White goods management – Two loads of metals were hauled to a recycler on December 12, 2017. A cumulative total of 6.41 tons of metal was hauled.</p>

20-81-200.A,B,E	Decomposition gas concentrations, monitoring & recordkeeping - 200.A – The first quarter monitoring event for 2018 had not been conducted at the time of the inspection. The fourth quarter 2017 landfill gas monitoring was reviewed during the previous inspection. 200.B - The gas monitoring network was observed on August 11, 2017.
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 November and December 2017. Month Number of complaints Nov.1 Dec.3 The facility continues to follow up on odor complaints. The complaints documented by the facility closely match the complaints received and logged by DEQ.
20-81-210	Leachate control - The facility provided the Leachate Flow Meter Readings chart for December 2016 to December 31, 2017. No leachate outbreaks were observed at the active waste cell. 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: 7/17/2017

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.