



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

BLUE RIDGE REGIONAL OFFICE

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June 5, 2023

Mr. Clarke Gibson
Director of Solid Waste
Region 2000 Service Authority
361 Livestock Road
Rustburg, Virginia 24588
cgibson@region2000.org

Sent by electronic mail

NO DEFICIENCY LETTER

Re: Region 2000 Landfill – Livestock Road Facility – 361 Livestock Road, Rustburg, VA Solid Waste Permit (SWP) 610

Dear Mr. Gibson:

On May 17, 2023, the Virginia Department of Environmental Quality Blue Ridge Regional Office staff conducted a compliance inspection of the solid waste management facility operating under SWP or PBR. 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) 597-6585 or nicole.tilley@deq.virginia.gov.

Sincerely,

A handwritten signature in black ink that reads "Nicole Tilley".

Nicole Tilley
BRRO Solid Waste Compliance Inspector

cc: Elliott Inge, Environmental Compliance and Safety Manager, einge@region2000.org
ECM – SWP610



Compliance Inspection Report

Inspection Summary

Facility: Region 2000 Regional Landfill - Livestock Rd Fac

Inspector: Nicole Tilley

Permit: SWP610

Inspection Date: 5/17/2023

Region: Blue Ridge

Approximate Arrival Time: 10:40 a.m.

Inspection Type: Compliance Evaluation Inspection

Inspection Method: Announced

Facility Staff: Elliot Inge, Environmental Compliance and Safety Manager

Exit Interview: Yes

Other DEQ Staff: Nicole Tilley (Solid Waste Permit Writer)

Weather Conditions: The weather was partly cloudy with temperatures averaging 60 F.

Comments: On May 17, 2023, Nicole Tilley and Nicole Dyer conducted an announced compliance inspection of Region 2000 Landfill - Livestock Road Facility. The inspection consisted of a tour of the facility, a records review, and exit interview. DEQ departed at approximately 1:30 p.m.

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	N/A

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
10.1-1408.1	Disclosure Statement - - The disclosure statement is up-to-date with no necessary changes needed.
10.1-1408.2	Operator Certification - - The facility has operators with valid licenses.
20-81-80	Waste Assessment Program - - The 2022 SWIA report was received on March 29, 2023.
20-81-100.B	<p>Compliance with the facility's permit - - Permit Module I: General Permit Conditions</p> <p>I.F.3. A site specific condition states the facility will conduct an annual survey annually by December 31. A report will be prepared and submitted to DEQ by April 1 of the following calendar year. A survey was conducted on December 31, 2022. The report was submitted on March 30, 2023 for review. Areas of overfill were noted during the review. On April 26, 2022, the facility provided a response with an explanation to the areas of overfill. Most areas of overfill were within the acceptable range (under 2 feet) considering the accuracy of the equipment. Other areas were believed to be the result of placing additional soil cover on the side slopes when making repairs to erosion. The facility plans to recheck the identified areas of overfill and if needed, regrade those areas.</p> <p>Permit Module II: Conditions of Operations</p> <p>II.A. The facility operated during normal operating hours.</p> <p>II.B. No unauthorized waste was accepted.</p> <p>II.C. The facility has a daily disposal limit of 2,580 tons per day. The facility operates below the daily disposal limit.</p> <p>II.D. The facility is approved to use posi-shell as alternate daily cover. The facility will apply posi-shell on the work face when waste will be placed in the same area the next operating day. Facility operators will place daily soil cover on the working face at the end of the operating week.</p>
20-81-100.E	<p>Unauthorized waste program and inspection - -</p> <p>E.1. The facility has an unauthorized waste plan consisting of signs, employee training, and random load inspections. The sign at the front of the entrance lists the hours of operation and the types of solid waste accepted and not accepted.</p> <p>E.2. Facility personnel also screen loads for unauthorized waste when vehicles are unloading at the working face. No unauthorized waste was reported since the previous inspection.</p> <p>E.5. Random load inspections were conducted with the following frequency:</p> <p>January: 49 inspections for 3,898 loads February: 49 inspections for 3,731 loads March: 58 inspections for 4,437 loads April: 49 inspections for 3,849 loads</p> <p>The facility is randomly inspecting a minimum of one-percent of the loads accepted at the facility.</p>
20-81-140.A.16	<p>Facility self inspections - -</p> <p>The facility conducted monthly self-inspections. The self-inspections for January through April 2023 were reviewed. No major issues were noted in self-inspection and records were complete.</p>
20-81-140.A.17	<p>Record maintained of waste received and processed - -</p> <p>The facility maintains a record of all waste received and processed. Records include date, quantity, and origin of waste received. Monthly totals for January through April 2023 are provided below.</p> <p>Month: Total Tonnage January: 17,477.09 tons February: 15,456.95 tons March: 18,518.51 tons</p>

	April: 16,054.68 tons
20-81-485	Operations Manual - - The facility's Operations Manual was reviewed and re-certified on August 24, 2022 by Clarke Gibson, Director of Solid Waste.
20-81-530	Permittee recordkeeping and reporting - - B. All required records were made available to DEQ upon request. C. On April 12, 2023, a fire occurred at the landfill. A verbal 24-hour notification was provided on April 12, 2023. A written 5-day notification was provided on April 13, 2023. The written notification stated that the small fire was caused by a lithium battery. Facility personnel removed the lithium battery from the trash, sprayed it with water, and covered it with dirt. The area was monitored until the end of the operating day. No smoke or flames were observed, and the debris was incorporated back into the working area and covered with posi-shell.
20-81-130	Facility design / construction - - A. The landfill has a daily disposal limit of 2,580 tons of solid waste. B. The site is screened on all sides by woods and natural barriers. Access roads are gated and portions of the facility are fenced. C. Internal roads are accessible and capable of withstanding heavy loads. D. The facility has a lighted and heated shelter for operating personnel with sanitation facilities. F. The landfill operators have radio communications available. H. The stormwater conveyance system is maintained to control run-on and run-off at the landfill. The stormwater conveyance system was functioning as designed. I. Fire breaks of 50 feet are maintained between the limits of waste and all tree lines.
20-81-140.A.1,4	Safety and fire control - - A.1. The facility conducts weekly safety trainings. A.4. No evidence of open burning on or near the waste cells was observed.
20-81-140.A.6	Pollutant discharge - - No leachate or solid waste was observed entering surface waters or wetlands.
20-81-140.A.7	Stormwater control system maintenance - - The stormwater perimeter ditches 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 basin had sufficient wet storage capacity.
20-81-140.A.8,14-15	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. A.14. All landfill appurtenances appeared to be properly maintained and operating as designed. 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.
20-81-140.A.9-13	Hazard and nuisance control - - No issues regarding odors, vectors, salvaging, mud on roadways or access to unauthorized areas of the facility were noted. The portable litter fencing was in place near the working face. Small amounts of blown litter was observed near the working face and on the southern side slopes. Facility personnel were observed cleaning up the blown litter during the inspection.
20-81-140.B	Compaction, cover & working face - - At the time of the inspection, the facility was operating a working face at the western area of Phase IV landfill. The working face was observed to be confined to an area appropriate for the amount of incoming waste. Some flagging was observed in the daily cover due to the storms that week. Adequate daily soil cover was being applied with good compaction. The intermediate soil cover was in good condition with no exposed waste. Soil is stockpiled near the working face.
20-81-610-660	Special Waste - - Waste tires are being stored in roll-off containers before being sent to Emanuel Tire for disposal. The facility receives white goods, which are processed with other scrap metals, and are stored in roll-offs.

20-81-160	Closure requirements - - The facility is not seeking closure at this time.
20-81-170	Post-closure care requirements - - The facility is currently an active landfill and not in post-closure care.
20-81-200.A,B,E	Decomposition gas concentrations, monitoring & recordkeeping - - A. The first 2023 quarterly landfill gas monitoring event was conducted on March 6, 2023. No exceedances of the action level (80% LEL for methane) or compliance level (100% LEL for methane) were reported at the gas boundary probes. No exceedances of the 25% LEL for methane were reported at the building monitoring locations. B. Facility conducts quarterly landfill gas monitoring. E. The first 2023 quarterly monitoring event report was provided for review. All required information was recorded.
20-81-200.C	Decomposition gas-remediation - - The facility has an active gas extraction system with blower and flare system. The blower and flare system were operating during the inspection.
20-81-200.D	Decomposition gas-odor management - - The facility continues to follow up on odor complaints and follow their Odor Management Plan.
20-81-210	Leachate control - - D. 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. F. No leachate seeps were observed on the side slopes of the active cells or cells under intermediate cover.
20-81-250	Groundwater monitoring program - - The facility monitors quarterly in a detection monitoring program due to the close proximity of wetlands.
20-81-260	Corrective action program - - The facility is not in corrective action.
20-81-385 & 395	Landfill Mining - - Landfill mining is not occurring at the facility.

Disclosure Statement Details

Key Personnel	Title
Alexander Brebner	Executive Director
Clarke W. Gibson	Director of Solid Waste
Elliott L. Inge	Environmental Technician
Larry P. Hall	Operations Manager

Disclosure Statement Last Updated: 9/1/2022

Waste Management Facility Operators

Licensed Operator	License #	Expiration Date
Clarke Gibson	4605003027	11/30/2023
Elliott Inge	4605002579	7/31/2023
Larry P. Hall	4605002033	12/31/2024
Shain R. Greenawalt	4605003764	7/31/2024

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.