



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

August 31, 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 Inspection

Dear Mr. Gibson:

On August 11, 2017, 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 – SWP556



Compliance Inspection Report

Inspection Summary

Facility: Region 2000 Regional Landfill - Livestock Rd Fac

Inspector: Douglas Foran

Permit: SWP610

Inspection Date: 8/11/2017

Inspection Type: Compliance Evaluation Inspection

Approximate Arrival Time: 9:15 am

Facility Staff: Robert Arthur, Environmental Compliance Coordinator and Licensed Landfill Operator

Inspection Method: Unannounced

Exit Interview: Yes

Weather Conditions: Overcast - Temp. 70 F at 9:15 am - Winds Calm - BP 30.06 - Ground Conditions Dry

Comments: The inspector departed the site at 2:15 pm.

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			

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 - Item 1 (Update to Item 2 on May 31, 2017 inspection) - On December 13, 2016, the facility requested, and was granted, an additional 120 days to evaluate the effectiveness of the Posi-Shell application to the northern and western side slopes of the Phase III waste cell for odor control. On June 23, 2017, DEQ received the facility's report reviewing the effectiveness of the application.</p> <p>Item 2 - 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 total monthly tonnage and daily average tonnages for May through July 2017.</p> <table border="0"> <tr> <td>Month.....</td> <td>Daily average tonnage</td> <td>Total monthly tonnage</td> </tr> <tr> <td>May</td> <td>652.13</td> <td>17,607.29</td> </tr> <tr> <td>June</td> <td>650.25</td> <td>16,906.38</td> </tr> <tr> <td>July</td> <td>648.27</td> <td>16,206.53</td> </tr> </table>	Month.....	Daily average tonnage	Total monthly tonnage	May	652.13	17,607.29	June	650.25	16,906.38	July	648.27	16,206.53
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20-81-100.E	<p>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.</p> <p>100.E.5 - Sufficient random load inspections were documented to meet the 1% requirement for May through July 2017.</p> <table border="0"> <tr> <td>Month.....</td> <td>Inspections conducted.....</td> <td>Loads received</td> </tr> <tr> <td>May</td> <td>48.....</td> <td>3533</td> </tr> <tr> <td>June</td> <td>46.....</td> <td>3631</td> </tr> <tr> <td>July</td> <td>47.....</td> <td>3560</td> </tr> </table>	Month.....	Inspections conducted.....	Loads received	May	48.....	3533	June	46.....	3631	July	47.....	3560
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20-81-140.A.16	<p>Facility self inspections - The facility performed monthly self-inspections on May 29, June 29, and July 12, 2017. A quarterly inspection was conducted on May 26, 2017 as well.</p>												
20-81-530	<p>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.</p> <p>530.C.3 - As requested by DEQ on September 29, 2016, the facility provided 24 hour and 5 day notifications for significant breakdowns of the odor management system.</p> <p>On July 20, 2017, the facility provided a 24 hour verbal notification that the Odor Boss Canon (portable misting system) failed. A follow up notification was provided on July 21, 2017, within 5 days, detailing plans for repairs. The unit was returned to service on July 29, 2017.</p> <p>On July 26, 2017, the facility provided a 24 hour verbal notification that the Byers Odor Control System (perimeter vapor system.) was down. A follow up notification was provided on July 27, 2017, within 5 days, informing DEQ the Byers System was back in service.</p> <p>No additional notifications were required.</p>												
20-81-130	<p>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.</p>												
20-81-140.A.1,4	<p>Safety and fire control - 140.A.1 – Safety meeting records for May 25th through August 10, 2017 were reviewed. Records included the materials presented, and sign-in sheets. Sign in sheets listed the meeting's topic, date, instructor, location, and attendees.</p> <p>140.A.4 – No indication of open burning of waste was found.</p>												
20-81-140.A.6	<p>Pollutant discharge - An unnamed tributary of Tussocky Creek is located between the SWP610 Livestock Rd. SLF, owned by Region 2000, and SWP285 Campbell Co. Closed SLF, owned by Campbell County, VA. During the inspection, no indication of solid waste from SWP610 impacting the tributary was found. No surface monitoring of the tributary is made in regard to the operation of SWP610. Surface water sampling is conducted for SWP285.</p>												
20-81-140.A.7	<p>Stormwater control system maintenance - Stormwater controls were observed to be in place and in good repair. The facility was excavating sediment buildup in the sediment basin prior to the underdrain. The main sediment basin for the facility, which receives flow from the underdrain and the stormwater system, appeared to have little sediment buildup. Ditch lines around the waste cell were generally clear of sediment and check dams to slow stormwater flow were installed. No indication of stormwater flow bypassing the stormwater system was observed.</p>												

20-81-140.A.8,14-15	<p>Facility operation, maintenance, and training - 140.A.15 – Sufficient equipment and trained operators were present at the facility. The inspection of the working face was conducted during the facility's lunch rotation. A 973 Cat track loader and an Aljohn compactor were in operation at the active working face. The facility also had an off-road dump truck, excavator, an additional Cat track loader, and a service truck available for use. A rubber tired loader with the Posi-Shell sprayer attached was stationed at the facility's equipment shop. The facility's second Aljohn compactor was down for repairs.</p>
20-81-140.A.9-13	<p>Hazard and nuisance control - 140.A.9 - Weekly litter cleanup was documented for June and July 2017.</p> <p>140.A.10 - Odors and vectors – No vector issues were noted.</p> <p>In addition to the odor management systems and practices in place, the facility is completing the final lift on Phase III. The western section of the Phase III cell, nearest Poplar Ridge sub-division is at final elevation. The facility is proceeding east across the Phase III waste cell 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 at the time of the inspection.</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. (See additional inspection report comments regarding the demonstration period under 20-81-100.B - Compliance with facility's permit.)</p> <p>Odor Boss Canon (Portable misting unit - Initiated March 25, 2016) - The unit was in operation and located at the SW corner of the LF directing a deodorizing spray toward Poplar Ridge sub-division and Calohan Rd.</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> <p>WWTP Sludge (Initiated June 18, 2015) - The practice of elevating the pH level of WWTP sludge received by the facility has continued. Sludge loads are sprayed with a deodorizer before being placed in the active working face. WWTP sludge generated by the City of Lynchburg is divided between the Region 2000 SLF, the Amelia SLF, and permitted land applications.</p> <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 began work on the final lift for Phase III earlier in the year at the western end of the waste cell nearest the Poplar ridge sub-division and has progressed east away from the sub-division and Calohan Rd. The facility used the Phase III lift for all incoming wastes until August 21, 2017. On August 21st, the facility notified DEQ that they would begin placing waste in Phase IV on August 22, 2017. The initial layer of waste (fluff layer) in Phase IV would be select loads, while coarser waste will be used to fill out the final lift of Phase III.</p> <p>140.B.1.a – Waste was spread into a thin layer over the active working face and compacted into place.</p> <p>140.B.1.b – The active lifts appeared to be approximately 10 feet in height. The facility's LF compactor is equipped with GPS equipment to provide constant monitoring of the waste cell's elevation. The current lift is bringing Phase III to final elevation for waste.</p> <p>140.B.1.c – Soil and Posi-Shell are used for daily cover. A soil only daily cover is applied over the weekend. Posi-Shell has a deodorizing agent included.</p> <p>140.B.1.d – Intermediate cover had been applied to slopes of the waste cell.</p> <p>140.B.2 – The active working face appeared to be reasonably sized for the volume of waste received.</p> <p>140.B.4-5 – 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 May, June, and July 2017.</p> <p>640 - Tire management - No tires were hauled since the load documented on April 7, 2017.</p> <p>650 - White goods management – One load of metal, containing 3.6 tons, was hauled for recycling on June 20, 2017.</p>
20-81-200.A,B,E	<p>Decomposition gas concentrations, monitoring & recordkeeping - 200.A – Third quarter 2017 landfill gas (LFG) monitoring was conducted on July 25, 2017. No exceedances of the lower explosive limit (LEL) or levels reaching the 80% action level for methane were reported at gas boundary probes. No methane gas levels were reported requiring action at the facility's scale house or maintenance building.</p>

	<p>200.B - In accordance with the facility's updated Gas Management Plan (GMP), approved June 20, 2016, boundary probes (BP)-1 through BP-4 were abandoned during the construction of Phase IV. The four probes were inside the footprint of the new waste cell. The revised GMP also stated DEQ would be notified following abandonment of the four probes. The notification was provided in a letter dated May 6, 2016.</p> <p>The complete boundary probe network was observed during this inspection. Boundary probes BP-05 through BP-15, BP-316 through BP319, and BP-38 through BP-45 were secured with locks and numbered.</p> <p>200.E – The third quarter monitoring report was reviewed at the facility's office. All required information was included.</p>
20-81-200.D	<p>Decomposition gas-odor management - 200.D.2 – Section 5.0 of the Odor Management and Control Plan 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 June and July 2017.</p> <p>Month ... Number of complaints June 5 July 5</p> <p>The facility continues to follow up on odor complaints. The complaints documented by the facility closely match the complaints received and logged by DEQ.</p>
20-81-210	<p>Leachate control - The facility provided the Leachate Flow Meter Readings chart for December 2016 to June 30, 2017.</p> <p>No leachate outbreaks were observed at the active waste cell or in the area around the leachate tank and pumping station.</p>
20-81-250	<p>Groundwater monitoring program - The groundwater monitoring network was observed. Upgradient well MW-7 and down gradient wells MW-5B, MW-8, MW-9A, MW-11 (observation well), MW-13, MW-12, MW-19, and MW-22 were found to be secured with locks, labeled with the well numbers posted, and stable with concrete apron pads intact. Identification numbers were added to the new wells for Phase IV (MW-12, MW-19, and MW-22) since the previous inspection.</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.