



# 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

May 22, 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 May 3, 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](mailto:Douglas.Foran@deq.virginia.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Doug Foran".

Doug Foran  
BRRO Solid Waste Inspector

SWP610 Region 2000 Livestock Rd. SLF  
May 22, 2018  
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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:** 5/3/2018

**Region:** Blue Ridge

**Approximate Arrival Time:** 8:30 am

**Inspection Type:** Compliance Evaluation Inspection

**Inspection Method:** Unannounced

**Facility Staff:** Clarke Gibson, Director of Solid Waste and Licensed Landfill Operator, Robert Arthur, Environmental Compliance Coordinator and Licensed Landfill Operator, and Larry "Buzz" Hall, Operations Coordinator and Licensed Landfill Operator greeted DEQ staff. Mr. Arthur conducted the field portion of the inspection.

**Exit Interview:** Yes

**Weather Conditions:** Sunny - Temp. 68 F - Wind SSW at 6 mph - BP 30.20 - Ground conditions Dry

**Other DEQ Staff:** Anita Walthall (Air Permit Writer)

**Comments:** DEQ staff conducted inspections of both SWP610 Livestock Road SLF (active) and SWP285 Campbell Co. SLF (closed) during the site visit. The facilities are adjoining and share a gated entry. DEQ staff departed the site after completing both inspections at 1:15 pm.

## Sanitary Landfill (Active)

Reference	Description	SL	Result
<b>Compliance Area: Operator Information</b>			
10.1-1408.1	Disclosure Statement	I	✓
10.1-1408.2	Operator Certification	II	✓
<b>Compliance Area: Recordkeeping, Reporting &amp; Permit</b>			
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	✓
<b>Compliance Area: Design, Construction &amp; Operation</b>			
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	✓
<b>Compliance Area: Closure &amp; Post-Closure Care</b>			
20-81-160	Closure requirements	II	
20-81-170	Post-closure care requirements	II	
<b>Compliance Area: Decomposition Gas Control</b>			
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	✓
<b>Compliance Area: Leachate Control</b>			
20-81-210	Leachate control	II	✓
<b>Compliance Area: Groundwater Monitoring</b>			

20-81-250	Groundwater monitoring program	II	✓
20-81-260	Corrective action program	II	
<b>Compliance Area: Landfill Mining</b>			
20-81-385 & 395	Landfill Mining	II	

SL = Severity Level

✓ = In Compliance

X = Alleged Violation

N/A = Not Applicable

Blank = Not Inspected

**General Comments**

Reference	Comments
20-81-80	Waste Assessment Program - The facility submitted the annual SWIA report on February 5, 2018. DEQ accepted the report on February 13, 2018.
20-81-100.B	<p>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 total monthly tonnages and daily average tonnages for January through April 2018.</p> <p>Month.....Monthly Total.....Daily Average            Jan. ....17,115.67.....658.30            Feb. ....14,327.66.....651.26            Mar. ....16,074.95.....656.12            Apr. ....16,722.67.....727.08</p>
20-81-100.E	<p>Unauthorized waste program and inspection - 100.E.1 - The facility's operating hours are posted at the front gate. A sign identifying unauthorized wastes is posted prior to the scale house.</p> <p>100.E.1 - Annual retraining for unauthorized waste recognition was conducted on January 23, 2018. Additional training for recognizing asbestos containing materials was provided on April 26, and May 3, 2018.</p> <p>100.E.5 - Sufficient random load inspections were documented to meet the 1% requirement for January through April 2018. The facility does not receive out of state waste.</p> <p>Month.....Inspections conducted.....Loads received            Jan. ....41.....3187            Feb. ....39.....2912            Mar. ....46.....3489            Apr. ....48.....3604</p>
20-81-140.A.16	Facility self inspections - The facility performed monthly self-inspections for January, February, March, and April 2018. Inspection reports were reviewed and were complete.
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 – The facility provided the following 24-hour or 5-day notifications since the previous inspection on January 23, 2018.</p> <p>On May 4, 2018, the facility provided a 24 hour written notification by email that the Odor Boss Canon (portable misting system) was out of service and service personnel were contacted for repairs.</p> <p>Also, on May 4, 2018, the facility provided a 24 hour written notification by email that a local roofing company delivered a load of waste roofing shingles to the facility. Six black plastic bags (approx. 55 gallon size each), marked asbestos containing material (ACM), were found in the load. Landfill Operations Supervisor, Jamie Jarman notified Environmental Compliance and Safety Manger, Robert Arthur who investigated the loads. Discussion with the company driver and company management indicated that the bags were used for cleanup of loose waste around a work site. This did not include ACM material. Mr. Arthur contacted DEQ. Since the facility is permitted to receive ACM, the facility dug a hole adjacent to the load and buried it near the active working face. The load was immediately covered with additional waste at the working face.</p>
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	<p>Safety and fire control - 140.A.1 – Safety meeting records for January 1, through May 3, 2018, were reviewed. Records included the materials presented, and sign-in sheets, which 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	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 under the groundwater corrective action plan for SWP285.
20-81-140.A.7	Stormwater control system maintenance - Stormwater controls, including ditch lines, check dams, two sediment basins, underdrain, and run-on, run-off controls for the waste cells were in place and in good repair. No indication of stormwater flow 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 an Aljohn compactor were in operation at the active working face. The initial lift of waste (fluff layer) is nearing completion on Phase IV and waste placed against Phase III is being compacted. A second Aljohn compactor was available for use. The Cat scraper pan was in use transporting soil from the borrow area to the working face. The facility's excavator and off-road dump truck had been transporting soil as well, but operators were on their lunch break at the time the inspector was at the working face. The facility's water truck was available for dust control. Both track loaders, a Cat 963 and a Cat 973, were down. The 973 was out of service for scheduled replacement of the undercarriage and new tracks. The 963 broke down after work began on the 973. Both machines were expected to be back in service within a week.
20-81-140.A.9-13	Hazard and nuisance control - 140.A.9 - Weekly litter cleanup was documented for January through April 2018. Ten sections of portable litter fencing were in place near the working face.  140.A.10 - Odors and vectors – No vector issues noted.  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:  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 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. Mr. Hall explained some areas of the Posi-Shell cover were damaged over the winter and by recent heavy rainfall. These areas will be graded and soil cover applied, if necessary. Areas where soil cover is applied will be seeded. The facility does not plan to apply additional Posi-Shell cover to these areas due to the anticipated start of final cover to these slopes.  3. Odor Boss Canon (Portable misting unit - Initiated March 25, 2016) - Facility staff notified DEQ on November 1, 2017, that they intend to winterize the unit (drain and take out of service) to prevent damage during the winter months. The facility notified DEQ on May 1, 2018 that the unit has been returned to service. The unit was in place along the southern side of Stage IV at the time of the inspection, but was down for service.  4. Byers Vapor System (Stationary perimeter system - Initiated March 16, 2016) – Both the original primary system and the new extension system were in operation. The primary system was operational along the western (Poplar Ridge) and southern (facing Rt. 24 - Colonial Highway) cell slopes. The new extension system is a self-contained system mounted on a 6x12 (approx.) 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.  5. 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.  6. WWTP Sludge (Initiated June 18, 2015) - The practice of elevating the pH level of WWTP sludge received by the facility has continued. Sludge generated by the City of Lynchburg WWTP 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.  140.A.12 – The facility has installed an automatic truck wash system to clear mud from trucks which helps maintain facility roadways during wet conditions. The system was not in use at the time of the inspection due to dry ground conditions. The facility's water truck was available to wet down roadways for dust control.  140.A.13 - Internal roads were well maintained and allowed access to all active areas of the facility.
20-81-140.B	Compaction, cover & working face - The facility continues to maintain a three day soil stock pile near, or easily accessible to, the active working face for daily cover and for after-hours fire control.  140.B.1.a – The working face was located along the western edge of Phase IV, overlapping the eastern edge of Phase III. Compaction of waste with the Aljohn compactors has resumed with the completion of the initial lift on Phase IV. Intermediate

	<p>cover soil from the slope of Phase III is being graded back to allow waste to waste contact between existing waste from Phase III and new waste from Phase IV.</p> <p>140.B.1.b – The lift appeared to be approximately 10 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.</p> <p>140.B.1.d – Reapplication of intermediate cover on Phase III slopes is nearing completion and seeding will follow. Grading was conducted two weeks ago, but heavy rainfall the following week disrupted the soil and created some minor erosion damage, which the facility plans to correct prior to seeding. Grading is expected to occur once one of the Cat track loaders is returned to service allowing the Cat D-6 dozer to return to slope work. Seeding will follow.</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. A full sized household freezer was received in a load while the inspector was at the working face. An equipment operator promptly moved the appliance to the side and radioed another operator to moved the freezer to the whitegoods area.</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 January through April 2017.</p> <p>640 - Tire management – Since January 4, 2018, the facility has hauled 37.9 tons of tires to Emanuel Tire for processing. As noted in the previous inspection report, the facility contacted DEQ concerning utilizing tires to hold down a rain covering for the Phase IV waste cell prior to construction. With construction completed and the initial lift of waste in Phase IV nearing completion, most of the tires have been removed from the rain cover and processed. The facility should keep the number of tires onsite below its permitted limit once the tires are longer in use on the rain cover.</p> <p>650 - White goods management – No appliances or metals were hauled since the previous inspection on January 23, 2018.</p>
20-81-200.A,B,E	<p>Decomposition gas concentrations, monitoring &amp; recordkeeping - 200.A – First and second quarter gas monitoring events for 2018 were conducted on January 30, and April 11, 2018, respectively. 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 in facility structures.</p> <p>200.B - The gas monitoring network was observed on August 11, 2017.</p> <p>200.E – The quarter monitoring reports were reviewed at the facility’s office. All required information was included.</p>
20-81-200.D	<p>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.</p> <p>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 January through April 2018.</p> <p>Month ... Number of complaints  Jan . . . . . 1  Feb . . . . . 3  Mar . . . . . 1  Apr . . . . . 2</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 2017 through April 2018.</p> <p>No leachate outbreaks were observed at the active waste cell or at the leachate tank and pump station.</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>
20-81-250	<p>Groundwater monitoring program - The groundwater monitoring network was observed on August 11, 2017.</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	11/30/2017
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.