



*Commonwealth of Virginia*

**VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**BLUE RIDGE REGIONAL OFFICE**

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Regional Director

August 27, 2021

*Via Electronic Mail*

Mr. Clarke Gibson  
Director of Solid Waste  
Region 2000 Service Authority  
361 Livestock Road  
Rustburg, Virginia 24588  
[cgibson@region2000.org](mailto:cgibson@region2000.org)

**NO DEFICIENCY LETTER**

Re: Region 2000 Landfill – Livestock Road Facility – Solid Waste Permit (SWP) 610  
Records Review Inspection – August 4, 2021

Dear Mr. Gibson:

On August 4, 2021, staff from the Virginia Department of Environmental Quality's Blue Ridge Regional Office conducted an off-site records review inspection of the solid waste management facility operating under SWP610. No site visit was performed due to social distancing and DEQ COVID-19 related protocols in place due to the pandemic. 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) 562-6740 or [nicole.tilley@deq.virginia.gov](mailto:nicole.tilley@deq.virginia.gov).

Sincerely,

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

Nicole Tilley  
Solid and Hazardous Waste Compliance Inspector

Region 2000 Landfill – Livestock Road Facility – SWP610

August 27, 2021

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cc: Mr. Robert Arthur, Region 2000 Environmental Compliance Coordinator  
DEQ ECM – SWP610



# Compliance Inspection Report

## Inspection Summary

**Facility:** Region 2000 Regional Landfill - Livestock Rd Fac

**Permit:** SWP610

**Region:** Blue Ridge

**Inspection Type:** Compliance Evaluation Inspection

**Facility Staff:** Robert Arthur, Environmental Compliance Coordinator  
Elliott Inge, Licensed Operator

**Inspector:** Nicole Tilley

**Inspection Date:** 8/4/2021

**Approximate Arrival Time:** 11:15 a.m.

**Inspection Method:** Announced

**Exit Interview:** Yes

**Weather Conditions:** The weather was partly cloudy with temperatures averaging 70 degrees F. Ground conditions were dry.

**Comments:** On August 4, 2021, Nicole Tilley conducted an announced compliance inspection of Region 2000 Landfill - Livestock Road Facility. Precautionary measures were implemented in accordance with DEQ Solid Waste Fieldwork protocols for COVID-19. The inspection consisted of a tour of the facility, a records review, and exit interview. Mr. Arthur and Mr. Inge assisted in the site tours, records review, and exit interview. DEQ departed at approximately 12:35 p.m.

## 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	N/A
20-81-170	Post-closure care requirements	II	N/A
<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	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 facility's disclosure statement is up-to-date and no changes were necessary since the previous inspection.
10.1-1408.2	Operator Certification - - The facility has six certified licensed operators with five valid licensed operators. Clarke Gibson's license has expired per the DPOR website.
20-81-80	Waste Assessment Program - - The 2020 SWIA report was received on March 12, 2021.
20-81-100.B	Compliance with the facility's permit - - The facility has a daily disposal limit of 2,580 tons per day. The facility operates below the daily disposal limit. Monthly totals for May through July 2021 are provided below.  Period: Total Tonnage May: 18,074.01 tons June: 19,864.22 tons July: 18,064.99 tons
20-81-100.E	Unauthorized waste program and inspection - - The facility has an unauthorized waste plan, consisting of signs, employee training, and random load inspections. Random load inspections were conducted with the following frequency:  May: 42 inspections for 4,186 loads June: 78 inspections for 4,314 loads July: 78 inspections for 4,094 loads  The facility is randomly inspecting a minimum of one percent of the loads accepted at the facility. 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.
20-81-140.A.16	Facility self inspections - - The facility conducted monthly self-inspections. The self-inspections for May through July 2021 was reviewed. The records note minor issues with erosion and blown litter. No major issues were noted in self-inspection and records were complete.
20-81-140.A.17	Record maintained of waste received and processed - - The facility maintains a record of all waste received and processed. Records include date, quantity, and origin of waste received.
20-81-485	Operations Manual - - The facility's Operations Manual was reviewed and re-certified on December 30, 2020 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. No events requiring 24-hour or 5-day notification to DEQ occurred since the previous inspection.
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

	<p>system was functioning as designed. The Flexamat downchutes on the closed Phase III landfill were repaired. Traditional slope drain pipes were installed and functioning as designed to control stormwater run-off.</p> <p>I. Fire breaks of 50 feet are maintained between the limits of waste and all tree lines.</p>
20-81-140.A.1,4	<p>Safety and fire control - -</p> <p>A.1. The facility conducts weekly safety trainings.</p> <p>A.4. No evidence of open burning on or near the waste cells was observed.</p>
20-81-140.A.6	<p>Pollutant discharge - -</p> <p>No leachate or solid waste was observed entering surface waters or wetlands.</p>
20-81-140.A.7	<p>Stormwater control system maintenance - -</p> <p>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.</p>
20-81-140.A.8,14-15	<p>Facility operation, maintenance, and training - -</p> <p>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.</p> <p>A.14. All landfill appurtenances appeared to be properly maintained and operating as designed.</p> <p>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.</p>
20-81-140.A.9-13	<p>Hazard and nuisance control - -</p> <p>A.9. The portable litter fencing was in place near the working face. Small amounts of blown litter was observed near the working face. The facility picks up blown litter on a weekly basis and facility personnel were observed cleaning up the blown litter during the inspection.</p> <p>A.10. The following ongoing odor control mechanisms and procedures were observed:</p> <ul style="list-style-type: none"> <li>- Active gas extraction system (Initiated August 2, 2016) – The high capacity blower/flare was in operation. Landfill gases are being drawn from gas extraction probes on Phase III and flared.</li> <li>- Posi-Shell/Interim Odor Control/ Daily Cover – Posi-shell is used as alternate daily cover when the facility will be operating in the working area the following day. Soil cover of at least six inches is applied in areas that the facility will not be operating the following day and during the weekends. The facility had sufficient daily cover.</li> <li>- Odor Boss Canon (Portable roll-off mounted misting unit – Initiated March 25, 2016). The vapor cannon has been winterized and is not currently in use. The facility plans to bring the unit back in operation during the warmer months.</li> <li>- Byers Vapor System (Primary perimeter system – Initiated March 16, 2016). Both the original primary system and the portable system were in operation. The primary system was operational along the western (Poplar Ridge) and southern (facing Rt. 24 – Colonial Highway) cell slopes. The portable system (Initiated March 2018) is a self-contained system mounted on a 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.</li> <li>-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.</li> </ul> <p>A.11. No issues regarding salvaging were observed.</p> <p>A.12. Trucks were creating dust on the access roads on-site to the working face. Facility personnel utilize a water truck to spray the roads during operational hours. No dust or mud was on the main off-site roads.</p> <p>A.13. Internal roads were well maintained and allowed access to all areas of the facility.</p>
20-81-140.B	<p>Compaction, cover &amp; working face - -</p> <p>At the time of the inspection, the facility was operating a working face at the southwestern area of Phase IV. The working face was observed to be confined to an area appropriate for the amount of incoming waste. 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.</p>
20-81-610-660	<p>Special Waste - -</p> <p>Waste tires are being stored in roll-off containers before being sent to Emanuel Tire for disposal.</p>

	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 third quarter landfill gas monitoring event was conducted on July 9, 2021. 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 third 2021 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 - - D.1. The facility follows the most updated Odor Management and Control Plan dated June 17, 2016. Odor control strategies are given in Section 3.0 through 3.9 – Strategies for Controlling Odors.  D.2. Section 5.0 of the updated plan states that documentation of odor complaints will be maintained and will be available for authorized officials. During the inspection, DEQ and the facility reviewed and discussed recent odor complaints.  The facility continues to follow up on odor complaints.  D.3. The plan is reviewed yearly for minor changes. The most recent review and revision was conducted on January 22, 2020 to update the odor complaint log.
20-81-210	Leachate control - - 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.  No leachate seeps were observed on the side slopes of the active cells or cells under intermediate cover.
20-81-250	Groundwater monitoring program - - Monitoring: The facility monitors quarterly in a detection monitoring program due to the close proximity of wetlands. The first quarter groundwater monitoring event occurred on February 8, 2021.
20-81-260	Corrective action program - - Corrective Action Program: The Corrective Action Program consists of a monitored natural attenuation remedy.
20-81-385 & 395	Landfill Mining - - Landfill mining is not occurring at the facility.

### 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	11/30/2019
Elliott Inge	4605002579	7/31/2023
Kenneth Jarman	4605002635	11/30/2021
Larry P. Hall	4605002033	12/31/2022
Robert Arthur	4605002613	3/31/2022
Shain R. Greenawalt	4605003764	7/31/2022

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.