



*Commonwealth of Virginia*

**VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**BLUE RIDGE REGIONAL OFFICE**

901 Russell Drive, Salem, Virginia 24153

(540) 562-6700 FAX (804) 698-4178

[www.deq.virginia.gov](http://www.deq.virginia.gov)

Travis A. Voyles  
Acting Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus  
Director  
(804) 698-4020

Robert J. Weld  
Regional Director

April 28, 2022

**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 Service Authority – Livestock Road – Solid Waste Permit (SWP) 610  
Announced Compliance Inspection – April 13, 2022

Dear Mr. Gibson:

On April 13, 2022, 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) 597-6585 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 Waste Compliance Inspector

cc: Mr. Elliot Inge, Environmental Technician  
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:** Elliot Inge, Environmental Technician

**Inspector:** Nicole Tilley  
**Inspection Date:** 4/13/2022  
**Approximate Arrival Time:** 10:00 a.m.  
**Inspection Method:** Announced  
**Exit Interview:** Yes  
**Weather Conditions:** The weather was partly cloudy with temperatures averaging 75F.

**Comments:** On April 13, 2022, Nicole Tilley conducted an announced compliance inspection of the Region 2000 Landfill - Livestock Road Facility. The inspection consisted of a tour of the facility, a records review, and exit interview. Mr. Inge assisted in the site tours, records review, and exit interview. DEQ departed at approximately 12:00 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	N/A
<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 - - An updated DISC02 and DISC03 was submitted on March 7, 2022 to update Mr. Elliot Inge's information and remove Mr. Robert Arthur.
10.1-1408.2	Operator Certification - - The facility has operators with valid licenses. Clarke Gibson's license has expired per the DPOR website.
20-81-80	Waste Assessment Program - - The 2021 SWIA report was received on February 18, 2022.
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 January through March 2022 are provided below.  Month: Total Tonnage January: 16,463.83 tons February: 17,406.45 tons March: 19,709.01 tons  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. The survey was completed on October 22, 2021. The report was submitted on March 23, 2022 for review. During the review, three areas were identified as overfill: the northern area of Phase IV, the western corner of Phase IV, and the southwest area of Phase III/IV.  During the inspection, several pipes were observed in the northern area of Phase IV. The topographical survey showed this area to have approximately 2 feet of overfill. The western corner of Phase IV and the southwest area of Phase III/IV were overfill areas identified on the topographical survey that had approximately 2-5 feet of overfill. Access roads to the landfill were constructed in these areas at the time of the inspection. Please provide an explanation of the overfill areas and any actions the facility will take to address the overfill areas. Please send your response to Nicole Tilley at <a href="mailto:Nicole.Tilley@deq.virginia.gov">Nicole.Tilley@deq.virginia.gov</a> within 30 days of the date of this report.
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:  January: 48 inspections for 3,078 loads February: 54 inspections for 3,646 loads March: 53 inspections for 4,597 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 January through March 2022 were 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 16, 2021 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 March 19, 2022, a fire occurred at the landfill; however, the landfill operators did not notify Elliot Inge until March 23,

	<p>2022. At the weekly safety meeting on Thursday, March 24 2022, the Emergency Action Plan in regards to fires was reviewed with all of the equipment operators and a couple of modifications were made to the plan. On March 28, 2022, a written 5-day notification was made to DEQ. A verbal 24-hour notification was unable to be provided for this event.</p> <p>During the April 13, 2022 inspection, Mr. Inge stated that the fire occurred on the western corner of the Phase IV landfill and that the fire lasted for 10 minutes on the morning of Saturday, March 19, 2022. Mr. Inge stated that operators have been made aware to report any future unusual conditions or areas of noncompliance immediately to his attention to meet the 24-hour verbal notification requirement.</p>
20-81-130	<p>Facility design / construction - -</p> <p>A. The landfill has a daily disposal limit of 2,580 tons of solid waste.</p> <p>B. The site is screened on all sides by woods and natural barriers. Access roads are gated and portions of the facility are fenced.</p> <p>C. Internal roads are accessible and capable of withstanding heavy loads.</p> <p>D. The facility has a lighted and heated shelter for operating personnel with sanitation facilities.</p> <p>F. The landfill operators have radio communications available.</p> <p>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.</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. The sediment basin had sufficient wet storage capacity.</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.</p> <p>A.10. On February 4, 2022, DEQ approved a trail shutdown of the Phase III southwest perimeter vapor unit and the Phase IV southern mobile vapor unit for 180 days. During the inspection, DEQ did not observe issues regarding odors.</p> <p>A.11. No issues regarding salvaging were observed.</p> <p>A.12. No issues regarding dust or mud on main off-site roads and access roads were observed.</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 northwestern 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> <p>The facility operates a smaller working face at the western corner of the Phase IV landfill on Saturdays. Minimal flagging was</p>

	observed through the daily cover. More daily soil cover should be added to the area to reduce the areas of exposed waste.
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 2022 quarterly landfill gas monitoring event was conducted on January 27, 2022. 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 2022 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 received 6 odor complaints between the time period of January 1, 2022 to April 11, 2022.  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 October 21, 2021 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 - - The groundwater monitoring network was not inspected.
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
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

Disclosure Statement Last Updated: 3/7/2022

### Waste Management Facility Operators

Licensed Operator	License #	Expiration Date
Clarke Gibson	4605003027	11/30/2021
Elliott Inge	4605002579	7/31/2023
Larry P. Hall	4605002033	12/31/2022
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.