



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

BLUE RIDGE REGIONAL OFFICE

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Robert J. Weld
Regional Director

August 1, 2022

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 – Solid Waste Permit (SWP) 610
Announced Compliance Inspection – July 27, 2022**

Dear Mr. Gibson:

On July 27, 2022, the Virginia Department of Environmental Quality Blue Ridge Regional Office staff 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.

Sincerely,

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

Nicole Tilley
BRRO Solid Waste Compliance Inspector

Region 2000 Landfill – SWP610

August 1, 2022

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cc: Mr. Robert Arthur, Region 2000 Environmental Compliance Coordinator
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, Interim Environmental Technician
(Larry) Buzz Hall, Operations Manager

Inspector: Nicole Tilley

Inspection Date: 7/27/2022

Approximate Arrival Time: 9:30 a.m.

Inspection Method: Announced

Exit Interview: Yes

Weather Conditions: The weather was partly cloudy and rainy with temperatures averaging 75F.

Comments: On July 27, 2022, Nicole Tilley 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 11:00 a.m.

The facility is in construction of the Phase V landfill. Facility personnel are excavating soils to base grade and liner material is being stored on the adjacent property.

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	N/A
20-81-170	Post-closure care requirements	II	N/A
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. 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 - - Permit Module I: General Permit Conditions 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. The survey was completed on October 22, 2021. The report was submitted on March 23, 2022 for review. Areas of overfill were noted during the review. On May 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 prior to the next annual survey. Permit Module II: Operations II.A. The facility operated during normal operating hours. II.B. No unauthorized waste was accepted. II.C. The facility has a daily disposal limit of 2,580 tons per day. The facility operates below the daily disposal limit. Monthly totals for April through June 2022 are provided below. Month: Total Tonnage April: 18,821.45 tons May: 19,249.68 tons June: 17,556.04 tons
20-81-100.E	Unauthorized waste program and inspection - - 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. 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. E.5. Random load inspections were conducted with the following frequency: April: 48 inspections for 4,263 loads May: 46 inspections for 4,202 loads June: 52 inspections for 4,212 loads The facility is randomly inspecting a minimum of one percent of the loads accepted at the facility.
20-81-140.A.16	Facility self inspections - - The facility conducted monthly self-inspections. The self-inspections for April through June 2022 were reviewed. The records note minor issues with erosion, stormwater ditches, 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. 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 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 blown litter, odors, vectors, salvaging, mud on roadways or access to unauthorized areas of the facility were noted.
20-81-140.B	Compaction, cover & working face - - 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. Some flagging was observed in the daily cover due to the storms that week. 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 second 2022 quarterly landfill gas monitoring event was conducted on May 24, 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

	<p>exceedances of the 25% LEL for methane were reported at the building monitoring locations.</p> <p>B. Facility conducts quarterly landfill gas monitoring.</p> <p>E. The second 2022 quarterly monitoring event report was provided for review. All required information was recorded.</p>
20-81-200.C	<p>Decomposition gas-remediation - -</p> <p>The facility has an active gas extraction system with blower and flare system. The blower and flare system were operating during the inspection.</p>
20-81-200.D	<p>Decomposition gas-odor management - -</p> <p>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.</p> <p>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>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.</p> <p>The facility continues to follow up on odor complaints.</p> <p>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.</p>
20-81-210	<p>Leachate control - -</p> <p>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.</p> <p>F. No leachate seeps were observed on the side slopes of the active cells or cells under intermediate cover.</p>
20-81-250	<p>Groundwater monitoring program - -</p> <p>Monitoring: The facility monitors quarterly in a detection monitoring program due to the close proximity of wetlands.</p> <p>Underdrains: Two underdrains are associated with the Phase IV/V expansion that flow out into the north sediment basin. The underdrains were not flowing during the inspection.</p>
20-81-260	<p>Corrective action program - -</p> <p>The facility is not in corrective action.</p>
20-81-385 & 395	<p>Landfill Mining - -</p> <p>Landfill mining is not occurring at the facility.</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

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

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.