



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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October 21, 2021

Mr. David Valdez
Skinquarter Land CDD Landfill
20701 Hull Street Road
Mosley, Virginia 23120

NO DEFICIENCY LETTER

Re: Skinquarter CDD Landfill – Chesterfield County, VA
Solid Waste Permit (SWP) No. 604

Mr. Valdez,

On August 30, 2021, the Virginia Department of Environmental Quality Piedmont Regional Office staff conducted a compliance evaluation inspection (CEI) of the solid waste management facility operating under SWP 604. 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 Permit No. 604.

During the inspection, no apparent violations of the Act, Regulations, or your permit SWP 604 were observed. A copy of the inspection checklist is enclosed.

If you have any questions, please contact me at (804) 527-5101 or douglas.masini@deq.virginia.gov.

Sincerely,

A handwritten signature in blue ink that reads "Doug Masini".

Doug Masini
PRO Solid Waste Inspector

Ecc: ECM – SWP 604



Compliance Inspection Report

Inspection Summary

Facility: Skinquarter Land CDD Landfill

Inspector: Douglas Masini

Permit: SWP604

Inspection Date: 8/30/2021

Region: Piedmont

Approximate Arrival Time: 0700

Inspection Type: Compliance Evaluation Inspection

Inspection Method: Unannounced

Facility Staff: David Valdez – General Manager, Edie DeVires – Office Manager, Ernest Hill – Facility Supervisor.

Exit Interview: Yes

Weather Conditions: Cloudy, 68 degrees F, Winds SSE 0-5 mph.

Comments: A full Compliance Evaluation Inspection (CEI) was conducted in order to review the facility for operational compliance for the period between June and August 2021. Contact with the Landfill Personnel was limited, adhering to social distancing standards as much as possible. In lieu of reviewing operational records onsite a request was submitted to have documents submitted electronically for review.

Construction / Demolition / Debris (CDD) 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			
20-81-110.B	Prohibited waste	II	✓
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.C	Compaction and cover	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	Decomposition gas control	II	✓
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			

20-81-385 & 395	Landfill Mining	II	
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SL = Severity Level ✓ = In Compliance X = Alleged Violation N/A = Not Applicable Blank = Not Inspected

General Comments

Reference	Comments
10.1-1408.1	<p>Disclosure Statement - Most recent Disclosure Statement information is listed at the bottom of this report. No changes to Key Personnel were reported during this review period.</p> <p>Please note that the Department has updated the agency's Disclosure Statement Forms (DISC-01, DISC-02, and DISC-03) as well as the instructions for completing the forms. The new forms and instructions are available on the DEQ public website at: https://www.deq.virginia.gov/permits-regulations/permits/waste/solid-waste under "Solid Waste Permit" -> "Notice of Intent" -> "Relevant Forms" -> "Disclosure Statement."</p>
10.1-1408.2	Operator Certification - The facility has a licensed operator as required. Operator information is listed at the bottom of this report.
20-81-100.E	<p>Unauthorized waste program and inspection - An Unauthorized Waste Control program (UAW) appears to be implemented at this facility. Training for UAW was conducted on July 2, 2021, for all applicable personnel. Random Load Inspections (RLI) are conducted for instate and out of state loads.</p> <p>Monthly Load counts and RLI totals were reviewed from June through August 2021, and appeared to meet or exceed the 1% in-state/10% out-of-state inspection frequency requirement. RLI forms were submitted for July 2021, as requested, and appeared to verify records. Ensure that each out-of-state RLI form is documented accordingly to show origin and maintained to show compliance.</p>
20-81-140.A.16	Facility self inspections - Facility site inspection records for the review period were requested for review. General Manager, Mr. Valdez, submitted weekly records for inspections conducted in July and August 2021. Partial records for June were reviewed during the last inspection and required modification to meet the Operations Manual Inspection plan. During the recent OPS Manual revision site inspections were changed from daily to weekly.
20-81-140.A.17	<p>Record maintained of waste received and processed - Intake records for June through August 2021 were reviewed onsite and reported the following:</p> <p>Month/Year ---- Total in Tons ---- Highest Daily Receipt</p> <p>Jun-2021 ----- 20,238 -----1048 tons (6-3) Jul-2021 ----- 17,993 ----- 1009 tons (7-21) Aug-2021 ----- 17,820 ----- 969 tons (8-18)</p> <p>Intake records reviewed were observed to be below the permitted maximum daily intake of 5,500 tons per day.</p>
20-81-485	<p>Operations Manual - The current Operations Manual was reported as revised on June 28, 2021.</p> <p>The Operations Manual was certified as compliant with current operations on June 28, 2021, by the General Manager, Mr. Valdez.</p> <p>Ensure that the Operations Manual is recertified by June 28, 2022.</p>
20-81-530	Permittee recordkeeping and reporting - One notice of non-compliance was received on July 9, 2021, indicating exceedance of leachate over liner. The 5-day follow-up was received on July 14, 2021 and included all information required for reporting.
20-81-110.B	Prohibited waste - No unauthorized waste was observed in the waste mass at the time of the inspection.
20-81-130	Facility design / construction - The facility appeared to be designed and constructed in accordance with this regulation.
20-81-140.A.1,4	<p>Safety and fire control - The facility Operations Manual was revised to conduct monthly safety training for all facility staff. Monthly safety training records were submitted for June and August 2021. General Manager, Mr. Valdez, reported that although monthly training was conducted in July 2021, documentation was not available. Ensure that training is conducted and documented as detailed within the Operations Manual and made available upon request.</p> <p>A fire control plan is maintained at the facility and is available for review by the public. Open burning of waste brought to the landfill is not permitted, and no open burning was observed during the inspection.</p>
20-81-140.A.6	Pollutant discharge - No pollutants or solid wastes were reported or observed entering into surface waters, groundwaters, or waters of the United States during this inspection.
20-81-140.A.7	Stormwater control system maintenance - Run-on/run-off control systems appeared to be constructed, maintained, and effective in controlling stormwater. No significant pooling or sediment discharges were noted.

20-81-140.A.8,14-15	<p>Facility operation, maintenance, and training - Facility access is controlled by a scale house, gates, fences, and natural barriers. Scale attendants were on site and controlling access at the time of inspection.</p> <p>Facility appurtenances appeared to be maintained and operated as designed and approved in the facility permit.</p> <p>Facility equipment operating at the workface in Cell 1 during the onsite inspection appeared adequate with 1 tipper, 2 dozers, and 1 compactor processing waste. One additional compactor was stationed onsite to meet additional demands as needed.</p>
20-81-140.A.9-13	<p>Hazard and nuisance control - Blown litter was noted along the northern edge of Cells 1 and 2 during the onsite inspection. Litter fencing was stationed along the eastern edge of both cells but litter was noted between the access road and the fence. No litter was being picked during the onsite inspection.</p> <p>H2S gas odors were detected offsite at the entrance. Onsite H2S odors were detected along the north-western edge of Cell 2 and along the western edge of Cell 1. Odors were noticeably stronger along the western edge of Cell 1 and 2 than was detected at the entrance of the facility at Route 360 (Hull Street Road). General Manager, Mr. Valdez, stated that their consultant was working on remedies to address the persistent odors emanating from Cell 2.</p> <p>DEQ received 19 odor complaints during the review period. The Facility has taken steps to address odor production with operational practices and monitoring strategies to pinpoint source points of odor generation. Monitoring records submitted by the facility were placed within Agency records.</p> <p>There were no observed disease vectors during the onsite inspection.</p> <p>Salvaging was not noted during the onsite inspection.</p> <p>Fugitive dust is controlled by an onsite water truck as needed. Dust was noted at the working face and access roads.</p> <p>No excessive mud or debris was noted tracked out onto the public roadway.</p> <p>Internal roads are maintained and were passable by ordinary vehicles.</p>
20-81-140.C	<p>Compaction and cover - During the onsite inspection the facility was placing waste in Cell 1. It was noted that clean soil was used as cover material on the top deck of Cell 1 and the majority of Cell 2. Cracks and rills were noted along the western side slope of Cell 1. Ensure that areas where additional cover is needed that they are addressed to prevent stormwater from causing further erosion and prevent subsurface gasses from escaping to the atmosphere.</p> <p>Areas that are well vegetated appear to have been mowed within the year.</p> <p>Slope angles appeared to be less than 33%.</p> <p>Waste being deposited, and in place, did not appear to contain unauthorized waste.</p>
20-81-610-660	<p>Special Waste - General Manager, Mr. Valdez, stated that no sludge, PCS, PCB, or ACM is accepted for disposal at the landfill.</p> <p>Facility records indicated that no metal was shipped off-site to recyclers during the review period. However additional scrap metal appeared to be collected and stored on top of Cell 1. Ensure scrap material is stored in areas detailed within the OPS Manual.</p> <p>Facility records indicated that no tires were shipped off-site for processing during the review period. It was noted that waste tires are maintained in open-top containers until shipped off-site for processing, and appeared to be more than previous inspections. Ensure that waste tires are stored and processed accordingly.</p>
20-81-200	<p>Decomposition gas control - 3rd Qtr. 2021 monitoring was conducted on August 24, 2021, and reported no exceedances of the Action Level.</p>
20-81-210	<p>Leachate control - Leachate is pumped and stored into one 500,000 gallon storage tank, where transport trucks haul the liquid to Proctors Creek WWTP (VA0060194) for treatment.</p> <p>The facility hauled the following gallons per the corresponding months:</p> <p>June 2021 – 172,758 gallons July 2021 – 455,294 gallons August 2021 – 350,411 gallons</p> <p>During the onsite inspection, the control panel serving the leachate pump in Sump #1 was observed to register the leachate depth at 13.4 inches. The sump depth below the liner was previously reported at 24", thus no leachate over liner issues were realized.</p>

One exceedance was reported on July 9, 2021, indicating leachate over the liner was exceeded due to a storm event that recorded 2.43" of rain at the facility. The 5-day follow-up stated that the system reacted as designed and compliance was achieved within the five day follow-up period. Additional pump and haul activity was performed to ensure storage space is adequate.

Disclosure Statement Details

Key Personnel

Title

David Valdez	General Manager
Michael Magee	Managing Partner

Disclosure Statement Last Updated: 2/27/2020

Waste Management Facility Operators

Licensed Operator

License

Expiration Date

David Valdez	4605003577	12/31/2021
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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.