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Taylor Road Landfill (SWP 270) Inspection Report 11/18/2021

1 message

Dacey, Katy <katy.dacey@deq.virginia.gov>

Tue, Dec 7, 2021 at 7:22 AM

To: Landfill <landfill@sbcoxdemolition.com>, "Barbee Cox, III" <b.cox@sbcoxdemolition.com>

Cc: Landfill <landfill@sbcoxdemolition.com>

Mr. Cox,

Attached is the report for the Taylor Road Landfill (SWP 270) inspection conducted on 11/18/2021. A hard copy will not be mailed unless requested. Please let me know if you have any questions.

Thanks,
Katy Dacey
Solid Waste Inspector
(804) 527-5092

**SWP 270 11-18-2021 CEI ND.pdf**

240K



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

PIEDMONT REGIONAL OFFICE

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Ann F. Jennings
Secretary of Natural and
Historic Resources

David K. Paylor
Director

James J. Golden
Regional Director

December 7, 2021

Mr. Barbee Cox, III
President
S.B. Cox, Inc.
P.O. Box 7737
Richmond, Virginia 23231

NO DEFICIENCY LETTER

**Re: Taylor Road Landfill - Chesterfield County, VA
Solid Waste Permit No. 270**

Dear Mr. Cox:

On November 18, 2021, the Virginia Department of Environmental Quality Piedmont Regional office staff conducted a compliance inspection of the solid waste management facility operating under SWP 270. 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 SWP 270.

During the inspection, no apparent violations of the Act, Regulations, or SWP 270 were observed. A copy of the inspection checklist is enclosed.

If you have any questions, please contact me at (804) 527-5092 or katy.dacey@deq.virginia.gov.

Sincerely,

A handwritten signature in cursive script that reads "Katy T. Dacey".

Katy T. Dacey
Solid Waste Compliance Inspector

cc: ECM – SWP 270
Greg Harris – S.B. Cox, Inc. (electronic)



Compliance Inspection Report

Inspection Summary

Facility: Taylor Road Landfill

Permit: SWP270

Region: Piedmont

Inspection Type: Compliance Evaluation Inspection

Facility Staff: Greg Harris

Inspector: Katy Dacey

Inspection Date: 11/18/2021

Approximate Arrival Time: 10:00am

Inspection Method: Announced

Exit Interview: Yes

Weather Conditions: 67°F sunny, windy

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	

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 - The facility's disclosure statement is updated as required and listed at the bottom of the report.</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 - This facility has associated licensed operators. Operator information is listed at the bottom of the report.
20-81-100.B	Compliance with the facility's permit - The facility was observed as maintained and operating in accordance with the solid waste permit and in accordance with the approved design and intended use of the facility.
20-81-100.E	Unauthorized waste program and inspection - Unauthorized waste inspections were reviewed from April 9, 2021 – November 7, 2021 and were observed to meet the frequency requirement. The facility conducts 2 unauthorized waste inspections per day. Annual unauthorized waste training for all employees was conducted November 17, 2020.
20-81-140.A.16	Facility self inspections - Facility self inspections are conducted daily, weekly and monthly. Facility self inspection records were reviewed from April 2021 – October 2021 and were observed to be sufficient.
20-81-140.A.17	<p>Record maintained of waste received and processed - Records of waste received and processed were reviewed from April 2021 – October 2021. The facility landfilled the following tons per month:</p> <p>April 2021 – 14,176 tons (highest daily 620 tons) May 2021 – 13,153 tons (highest daily 700 tons) June 2021 – 15,279 tons (highest daily 730 tons) July 2021 – 13,014 tons (highest daily 820 tons) August 2021 – 11,975 tons (highest daily 660 tons) September 2021 – 12,537 tons (highest daily 590 tons) October 2021 – 11,928 tons (highest daily 668 tons)</p> <p>The facility appeared to be in compliance with 1,000 tons maximum per day.</p>
20-81-485	Operations Manual - The facility Operations Manual was last re-certified on January 8, 2021 by Greg Harris to be consistent with current operations and regulatory requirements. Regulations require that the Manual is reviewed and re-certified annually. Recertification is due no later than January 8, 2022.
20-81-530	Permittee recordkeeping and reporting - No deficiencies to the permittee reporting or recording requirements were observed during the inspection.
20-81-110.B	Prohibited waste - No unauthorized waste was observed during the inspection. The facility accepts CDD waste, land clearing debris, shred, split or halved tires, white goods and non friable asbestos.
20-81-130	Facility design / construction - Design and construction requirements were observed to be sufficient in accordance with regulatory requirements. Continuing construction activities appeared to be continuing to include liner installation was completed in the future Cell N area.
20-81-140.A.1,4	Safety and fire control - Safety meetings are conducted on a weekly basis. Safety meeting records were reviewed from April 2021 – October 2021 and were observed to be adequate.
20-81-140.A.6	Pollutant discharge - No pollutants or solid wastes were observed or reported entering into surface waters, groundwaters or waters of the United States.
20-81-140.A.7	Stormwater control system maintenance - All run-on/run-off control systems were observed to be adequately maintained.
20-81-140.A.8,14-15	Facility operation, maintenance, and training - Facility access is controlled by gate, fencing and natural barriers. The office is staffed during operational hours Monday - Saturday. No access issues were noted during the inspection. Facility appurtenances were observed to be properly maintained and operated. One dozer, 1 compactor and one excavator was observed in operation at the work face. Sufficient back up equipment was observed adjacent to the working face.
20-81-140.A.9-13	<p>Hazard and nuisance control - From the May 2021 - October 2021, approximately 40 odor complaints have been received. All complaints received came from residents that live within 3 miles of the facility and where all regarding hydrogen sulfide (H2S) smells. Since the Odor Management Plan (OMP) has been deployed at this facility beginning mid March 2021, facility staff are continuing to respond to the complainants and taking immediate steps as listed in the OMP. Since the previous inspection, the following has been deployed as odor mitigation:</p> <p>*Installation of H2S monitors at the complainants residence and on the Southside of the facility closest to the waste management boundary *Additional soil is being applied to the East toe slopes of Cell O as possible odors are observed in these areas *Continuing the additional pumping of the leachate lagoons</p>

	<p>*Turning aerators off in all three of the leachate lagoons in the evening and back on mid-morning</p> <p>The facility has been in contact with the consultant regarding the continued efforts for odor mitigation to include installing neutralizers on the Southside the facility and wherever necessary and are also discussing to use a gas extraction system.</p> <p>No on-site or off-site odors, fugitive dusts, mud deposits, birds, vectors or blown litter were observed to be an issue during the inspection. Internal roads were observed to be maintained and passable during the inspection.</p>
20-81-140.C	Compaction and cover - The working face was observed to be smaller than practical and adequately compacted. The facility was placing waste in Cell O. Portable litter fencing was observed surrounding the working face. Soil was observed to be the current cover material for progressive cover.
20-81-610-660	Special Waste - No special waste requests have been received since the previous inspection. No special wastes were observed during this inspection.
20-81-200	Decomposition gas control - Quarterly landfill gas (LFG) monitoring events were conducted on May 4, 2021, August 5, 2021 and November 2, 2021. All LFG monitoring records observed indicated 0% methane in all boundary probes and facility structures.
20-81-210	<p>Leachate control - Leachate collected is stored in lined lagoons (#1, #2 and #3) then pumped and hauled to Proctors Creek Wastewater Treatment Plant (VA0060194). No leachate management issues were observed during the inspection. Leachate volume records were review from April 2021 – October 2021. Monthly totals of leachate hauled are listed below.</p> <p>April 2021 – 870,000 gallons May 2021 – 528,000 gallons June 2021 – 598,652 gallons July 2021 – 487,409 gallons August 2021 – 878,326 gallons September 2021 – 569,122 gallons October 2021 – 404,801 gallons</p> <p>Aerators were observed in operation during the inspection in lagoons #1 and #3. Greg Harris stated that the aerator in lagoon #2 had just tripped the breaker and he would restart after the inspection was completed.</p>

Disclosure Statement Details

Key Personnel	Title
Greg Harris	Landfill Supervisor
S.B. Cox III	President
William Ottley, Jr.	General Superintendent

Disclosure Statement Last Updated: 1/31/2017

Waste Management Facility Operators

Licensed Operator	License #	Expiration Date
Gregory Harris	4605003532	5/31/2023
S.B. Cox III	4605001311	11/30/2022

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.