



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

PIEDMONT REGIONAL OFFICE
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James Golden
Regional Director

February 17, 2022

Mr. Bruce Coble,
Operations Supervisor
Shoosmith Bros., Inc.
P.O. Box 2770
Chesterfield, VA 23832

INSPECTION REPORT

Re: Shoosmith Sanitary Landfill – Chesterfield County, VA
Solid Waste Permit (SWP) No. 587

Mr. Coble,

On November 11, 2021, the Virginia Department of Environmental Quality's PRO staff conducted a focused compliance inspection of the solid waste management facility operating under SWP 587. 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 587.

Alleged violations identified during the inspection will be addressed under a pending Consent Order for similar alleged violations observed during a previous compliance inspection which resulted in a Notice of Violation dated November 1, 2021. A copy of the inspection checklist is enclosed. Pursuant to Va. Code § 10.1-1455 (G), this letter is not a case decision under the Virginia Administrative Process Act, Va. Code § 2.2-4000 *et seq.*

If you have any questions, please contact me at **804.712.9890** or douglas.masini@deq.virginia.gov.

Sincerely,

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

Doug Masini
PRO Solid Waste Compliance Inspector

cc: Andrea Wortzel, Counsel Troutman-Pepper
Jefferson Reynolds, PRO Enforcement Manager
Priscilla Rohrer, CO Solid Waste Compliance Coordinator
ECM – SWP587



Compliance Inspection Report

Inspection Summary

Facility: Shoosmith Sanitary Landfill

Inspector: Douglas Masini

Permit: SWP587

Inspection Date: 11/10/2021

Region: Piedmont

Approximate Arrival Time: 0730

Inspection Type: Focused Compliance Inspection

Inspection Method: Announced

Facility Staff: Darnell Collins - Safety Officer, Bruce Coble – Operations Supervisor

Exit Interview: Yes

Weather Conditions: Clear, 52 degrees F, Winds NNW 0-5 MPH

Comments: A Focused Compliance Inspection (FCI) was conducted in order to review the facility at their current operational condition. Contact with Landfill personnel was limited, with adherence to state and agency protocols and standards maintained to the strictest point possible. This review entailed traversing the perimeter road and the work-face, and noting issues observed during the onsite review.

The facility was operating as permitted, placing waste in Cell 23 and placing fluff in Cell 25. No odors were detected off-site, however they were detected onsite along the northern edge of Cell 26, at the perimeter road. All compliance issues noted during the onsite review were noted below within the report.

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	X
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	X
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	
20-81-170	Post-closure care requirements	II	
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	X

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

Alleged Violations

Reference	Comments
20-81-530	<p>Permittee recordkeeping and reporting - During the onsite review it was apparent that during gas header installation along Cell 26, leachate had spilled out across the access road and pooled on unlined areas. No notification was sent to DEQ notifying of the unusual occurrence.</p> <p>Also it was noted that a 4 inch leachate discharge pipe, pumping leachate from Cell 24 into a lift station near Cell 22 was discharging the liquid short of the drop-in station. It was unapparent how long the liquid had been pumping.</p> <p>Both instances were brought to the attention of the Facility Manager, Bruce Coble.</p>
20-81-140.A.7	<p>Stormwater control system maintenance - Sediment Basin 11 appeared to have been recently inundated with storm water causing sediment to fill the temporary forebay. The Basin proper appeared to be contaminated with litter in which a swirling vortex was noted originating in the center of the basin. When brought to the attention of the Landfill Operations Supervisor, Mr. Bruce Coble, he stated it may be due to recent forebay cleaning operations.</p> <p>Maintenance is required to remove litter from the basin to avoid waste from entering the outfall and into surface waters.</p>
20-81-210	<p>Leachate control - An area along the access road, at the toe of Cell 26B, showed evidence of a leachate spill with residue pooling on both sides of the access road. A pump truck was noted actively pumping pooled leachate in one area. Work to extend leachate condensate and gas lines up the side slopes of Cell 26B was noted as ongoing during the onsite review.</p> <p>At the toe of Cell 26A, it was apparent that seeps had occurred near the stormwater down chute that flowed into the stormwater drain.</p> <p>A 4 inch leachate drain line, that pumps leachate from Cell 24 and discharges into the main pump station at Cell 22, was not positioned correctly to discharge liquids into the pump station, allowing liquids to spill onto the ground, in an unlined area, short of the pump station inlet. Notification was received the next day that indicated the line had been moved and secured to discharge within the pump station inlet.</p> <p>Leachate was noted within the concrete storm drain along the access road across from the gas plant.</p> <p>Lastly, leachate was noted pooled in several areas at the toe of Cell 23.</p>

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	<p>Operator Certification - The facility has a licensed operator as required. Operator information is listed at the bottom of this report.</p>
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 equipment operating at each workface appeared adequate with 1 tipper, 2 dozers, 2 compactors, and a track hoe, at Cell 23. Facility equipment operating at Cell 25 consisted of 2 dozers and 1 compactor.</p>
20-81-140.A.9-13	<p>Hazard and nuisance control - Landfill gas odors were detected during the onsite inspection in and around Cell 26D, along the perimeter road.</p>

20-81-140.B

Compaction, cover & working face - The facility appeared to be spreading, compacting, and confining the workface areas as small as practicable based on waste received, machinery available, and equipment operators onsite. The facility was filling in Cell 23 and Cell 25. Cell 25 was confined to fluff material.

Clean soil and RusFoam, an approved ADC, appeared to be used as daily cover at both workfaces. The workface in Cell 23 appeared to have 3 days of cover stockpiled in close proximity to the workface. The workface in Cell 25 appeared to be using RusFoam with no clean soil piles.

It appeared that areas previously covered with RusFoam at the close of the previous day was not applied as per the manufactures specifications, with waste appearing to be minimally covered.

Ensure that future applications are applied as directed by the manufacture to properly protect against vectors, fires, blowing litter, odors, and scavenging, in addition to limiting erosion and providing effective cover until intermediate cover is applied.

Disclosure Statement Details

Key Personnel

Title

Bruce Coble	Landfill Manager/Environmental Coordinator
Fletcher Kelly	VP Shoosmith Bros. Inc.
Fred Nichols	VP Shoosmith Bros. Inc.
Lawrence McGee	CFO/VP Shoosmith Bros. Inc.
Tim Inge	Grounds Maintenance Manager

Disclosure Statement Last Updated: 11/10/2016

Waste Management Facility Operators

Licensed Operator

License

Expiration Date

Bruce Coble	4605001728	12/31/2023
Tim Inge	4605002080	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.

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

PRO Regional Office

Photos have not been altered except to change the size of the file.

Site Name: Shoosmith Sanitary Landfill

Permit#

SWP-587

Taken By: Doug Masini



Photo Number:	1
Date:	11-10-2021
Comments: Photo showing leachate pooling at access road across from Cell 26.	



Photo Number:	2
Date:	11-10-2021
Comments: Photo showing leachate pooling at access road across from Cell 26.	

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PRO Regional Office

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Site Name: Shoosmith Sanitary Landfill
Taken By: Doug Masini

Permit# SWP-587



Photo Number:	3
Date:	11-10-2021
Comments: Photo showing gas piping construction occurring in Cell 26.	



Photo Number:	4
Date:	11-10-2021
Comments: Photo showing leachate pooling at access road at toe of Cell 26.	

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PRO Regional Office

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Site Name: Shoosmith Sanitary Landfill

Permit#

SWP-587

Taken By: Doug Masini



Photo Number:	5
Date:	11-10-2021
Comments: Photo showing leachate pooling at access road at toe of Cell 26.	



Photo Number:	6
Date:	11-10-2021
Comments: Photo showing where leachate had flowed into stormwater channel that leads to Basin 11.	

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

PRO Regional Office

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Site Name: Shoosmith Sanitary Landfill

Permit#

SWP-587

Taken By: Doug Masini



Photo Number:	7
Date:	11-10-2021
Comments: Photo showing leachate discharging from a 4" pipe missing the main pump station collection well.	



Photo Number:	8
Date:	11-10-2021
Comments: Photo showing temporary forebay filled with stormwater and sediment.	

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Site Name: Shoosmith Sanitary Landfill

Permit#

SWP-587

Taken By: Doug Masini



Photo Number:	9
Date:	11-10-2021
<p>Comments: Photo showing Sediment Basin 11 with litter floating and swirling from center outward.</p>	



Photo Number:	10
Date:	11-10-2021
<p>Comments: Photo showing leachate flowing along concrete stormwater channel across from the gas plant, from the west.</p>	

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

PRO Regional Office

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Site Name: Shoosmith Sanitary Landfill

Permit#

SWP-587

Taken By: Doug Masini



Photo Number:	11
Date:	11-10-2021
Comments: Photo showing leachate flowing along concrete stormwater channel across from the gas plant, towards the east.	



Photo Number:	12
Date:	11-10-2021
Comments: Photo showing leachate pooling in unlined area at the toe of Cell 23.	

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

PRO Regional Office

Photos have not been altered except to change the size of the file.

Site Name: Shoosmith Sanitary Landfill
Taken By: Doug Masini

Permit# SWP-587



Photo Number:	13
Date:	11-10-2021
Comments: Photo showing leachate pooling in unlined area at the toe of Cell 23.	

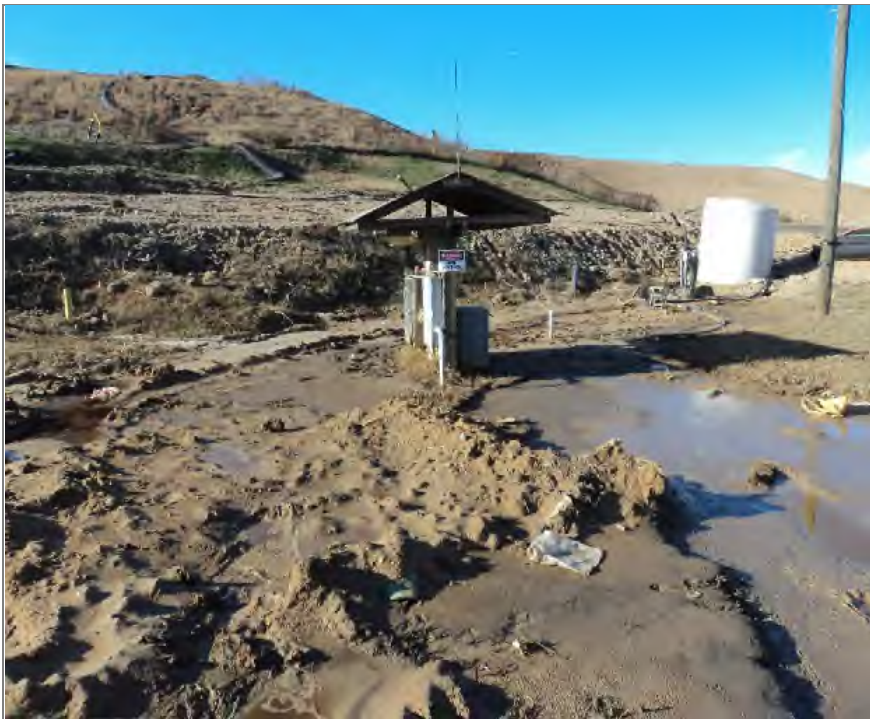


Photo Number:	14
Date:	11-10-2021
Comments: Photo showing leachate pooling in unlined area at the toe of Cell 23.	