



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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August 5, 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 June 28, 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: 6/28/2021

Region: Piedmont

Approximate Arrival Time: 0720

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: Clear, 71 degrees F, Winds SSE 5-10 mph

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	Disclosure Statement - The facility Disclosure Statement is updated as required. Disclosure Statement information is listed at the bottom of this report.
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 appears to be implemented at this facility. Training documents were incomplete and unavailable onsite. Request was made for documents to show training had been conducted for all operational staff, which was submitted on July 3, 2021, and appeared to be complete. Ensure that training records for applicable staff is maintained onsite and available for review.</p> <p>Monthly Load totals were reviewed from March through May 2021, and appeared to meet or exceed the 1% in-state/10% out-of-state inspection frequency requirement. Ensure that each out-of-state location meets the 10% inspection rate and documentation is maintained to show compliance.</p>
20-81-140.A.16	<p>Facility self inspections - Facility site inspection records were reviewed onsite were for compliance to the regulation. Facility Operations Manual state that Daily, Weekly, and Monthly, site inspections are to be conducted and documented. Currently inspections are preformed and documented on forms that do not contain all sections listed in the Operations Manual.</p> <p>Upon request, the Facility Manager modified the inspection forms and submitted documentation on July 3, 2021, to show compliance to the regulation and the current Operations Manual. Ensure all Self Site Inspections, as noted in the current Operations Manual and submitted revised forms, are conducted, documented, and maintained onsite for review.</p>
20-81-140.A.17	<p>Record maintained of waste received and processed - Intake records for March through May 2021 were reviewed onsite and reported the following:</p> <p>Month/Year ---- Total in Tons ---- Highest Daily Receipt</p> <p>Mar-2021 ----- 21,693 ----- 1106 tons (3-30)</p> <p>Apr-2021 ----- 21,979 ----- 1147 tons (4-14)</p> <p>May-2021 ----- 18,759 ----- 1150 tons (5-5)</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 on record was revised in February 2019.</p> <p>Operations Manual Certification page was submitted for review, indicating that David Valdez certified the current Ops Manual compliant with current operations as of June 30, 2021.</p> <p>Regulations require recertification by June 30, 2022.</p>
20-81-530	Permittee recordkeeping and reporting - No reports of non-compliance or unusual conditions have been received during this review period.
20-81-110.B	Prohibited waste - No unauthorized waste was observed in the waste mass at the time of the inspection.
20-81-130	<p>Facility design / construction - The facility appeared to be designed and constructed in accordance with this regulation, however recurring leachate-over-liner exceedances continue to exist and are being reviewed by facility consulting engineers for resolution.</p> <p>The facility was observed placing all waste in Cell 2.</p>
20-81-140.A.1,4	<p>Safety and fire control - The facility Operations Manual indicates weekly safety training is provided for facility staff. Training records for March through May 2021 were submitted for review and indicated that no documentation for March was available, April training appeared complete, and only 1 week in May was available. Ensure that training is conducted and documented as detailed within the Operations Manual.</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	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>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 2 during the onsite inspection appeared adequate with 1 tipper, 3 dozers, and 1 compactor.</p>
20-81-140.A.9-13	<p>Hazard and nuisance control - Blown litter was noted along the Eastern 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>Landfill gas odors were detected off- and onsite along the north-western edge of Cell 2, in the form of H2S gas odors. The odors were noticeably stronger along the anchor trench of Cell 2 than was detected at the entrance of the facility at Route 360 (Hull Street Road). It was noted that a leachate clean-out pipe, at the southwest corner of Cell 1, had been damaged and gasses were noted coming out of the damaged cap. Facility General Manager sent photo documents to show the pipe had been repaired. Facility General Manager indicated that their consultant was working on remedies to address the persistent odors emanating from Cell 2.</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 2. It was noted that clean soil was used as cover material on the top deck of Cell 1 and the majority of Cell 2. However the workface area in Cell 2 did not show signs of being covered at the end of the previous work week as required. Also it was noted that cover had not been applied in Cell 2 at the north and northwest edges, which allowed waste to be uncovered and gasses to escape. Facility Manager responded by applying additional cover to all areas as required by the end of the work week and sending photo evidence for two weeks in a row. Ensure that cover continues to be applied as required at the end of the work week.</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 indicated that no sludge, PCS, PCB, or ACM is accepted for disposal at the landfill.</p> <p>Facility reported that no metal was shipped off-site to recyclers during the review period.</p> <p>Facility reported that no tires were shipped off-site for processing during the review period.</p>
20-81-200	<p>Decomposition gas control - 2nd Qtr. 2021 monitoring was conducted on May 27, 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>March 2021 – 220,056 gallons April 2021 – 211,912 gallons May 2021 – 92,654 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 14 inches. The sump depth below the liner was previously reported at 24", thus no leachate over liner issues were realized.</p> <p>No exceedances were noted or reported during the review period.</p>

Disclosure Statement Details

Key Personnel

Title

David Valdez	General Manager
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Disclosure Statement Last Updated: 2/27/2020

Waste Management Facility Operators

Licensed Operator	License #	Expiration Date
David Valdez	4605003577	12/31/2021

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.