



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

PIEDMONT REGIONAL OFFICE

4949-A Cox Road, Glen Allen, Virginia 23060

(804) 527-5020 Fax (804) 527-5106

www.deq.virginia.gov

Matthew J. Strickler
Secretary of Natural Resources

David K. Paylor
Director

James J. Golden
Regional Director

February 11, 2019

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

NO DEFICIENCY LETTER

**Re: Taylor Road Landfill
Solid Waste Permit (SWP) No. 270**

Dear Mr. Cox:

On January 8, 2019, 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



Compliance Inspection Report

Inspection Summary

Facility: Taylor Road Landfill

Inspector: Katy Dacey

Permit: SWP270

Inspection Date: 1/8/2019

Region: Piedmont

Approximate Arrival Time: 9:45am

Inspection Type: Compliance Evaluation Inspection

Inspection Method: Announced

Facility Staff: Greg Harris

Exit Interview: Yes

Weather Conditions: 48 overcast

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's disclosure statement is updated as required and listed at the bottom of the report. |
| 10.1-1408.2 | Operator Certification - The facility has associated licensed operators as required is listed at the bottom of the report. |
| 20-81-100.E | Unauthorized waste program and inspection - Unauthorized waste inspections were reviewed from March 9, 2018 - January 3, 2019 and were observed to meet the frequency requirement. There is an average of 2 unauthorized waste inspections conducted per day. |
| 20-81-140.A.16 | Facility self inspections - Facility self inspections are conducted daily, weekly and monthly. They were reviewed from September 6, 2018 - January 7, 2019 and were observed to be sufficient. |
| 20-81-140.A.17 | Record maintained of waste received and processed - Records of waste received and processed were reviewed from April 2018 - August 2018. The facility received and landfilled the following: September 2018 - 9,711 tons October 2018 - 13,047 tons November 2018 - 11,067 tons December 2018 - 8,491 tons |
| 20-81-485 | Operations Manual - The facility's Operational Manual was reviewed and observed to contain all required information. The Manual was certified with current operations and regulatory requirements on January 8, 2019 by Greg Harris. Annual recertification is due no later than January 8, 2020. |
| 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. |
| 20-81-140.A.1,4 | Safety and fire control - Safety meetings are conducted on a weekly basis. Safety meeting records were reviewed from September 10, 2018 to January 7, 2019 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. Two compactors, 1 dozer, 1 excavator and 1 water truck were observed operating at the working face or in surrounding areas. |
| 20-81-140.A.9-13 | Hazard and nuisance control - No off-site or on-site odors were observed during the inspection. Aerators were in operation in lagoons #2 and #3 during the inspection. Facility staff stated aerator in lagoon #1 was currently being repaired. No salvaging was observed during the inspection. |
| 20-81-140.C | Compaction and cover - The working face appeared to be sufficient in size and adequately compacted. The facility was placing waste in Cell P. Small saplings were observed on the western side of Cell B. |
| 20-81-610-660 | Special Waste - No special waste requests have been received since last inspection. |
| 20-81-160 | Closure requirements - Final capping is planned for Cells A, B, C, D and F in the next coming months. |
| 20-81-200 | Decomposition gas control - Landfill gas monitoring was conducting for the fourth quarter 2018. Monitoring results were reviewed and indicated 0% methane boundary probes and facility structures. |
| 20-81-210 | Leachate control - Leachate collected is stored in lined lagoons (#1, #2 and #3) and pumped and hauled to Proctors Creek Wastewater Treatment Plant. Leachate volume records were review from September 2018 - January 7, 2019. Monthly totals of leachate hauled are listed below. September 2018 - 174,000 Gallons October 2018 - 234,000 gallons November 2018 - 342,000 gallons December 2018 - 426,000 gallons January 2019 (thru 1/7) - 168,000 gallons |

Disclosure Statement Details

Key Personnel

Title

| | |
|---------------------|---------------------|
| Greg Harris | Landfill Supervisor |
| S.B. Cox III | |
| William Ottley, Jr. | |

Disclosure Statement Last Updated: 1/31/2017

Waste Management Facility Operators

| Licensed Operator | License # | Expiration Date |
|-------------------|------------|-----------------|
| Gregory Harris | 4605003532 | 5/31/2019 |
| S.B. Cox III | 4605001311 | 11/30/2020 |

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.