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Taylor Road Landfill (SWP 270) Inspection Report 4/8/2021

1 message

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

Thu, May 6, 2021 at 2:20 PM

Cc: Landfill <landfill@sbcocxdemolition.com>, gharris623@gmail.com

Mr. Cox,

Attached is the report for the Taylor Road Landfill (SWP 270) inspection conducted on 4/8/2021. 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 4-8-2021 FCI ND.pdf
244K



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

PIEDMONT REGIONAL OFFICE

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Matthew J. Strickler
Secretary of Natural Resources

David K. Paylor
Director

James J. Golden
Regional Director

May 6, 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 April 8, 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: Focused Compliance Inspection

Facility Staff: Greg Harris

Inspector: Katy Dacey

Inspection Date: 4/8/2021

Approximate Arrival Time: 5:45am

Inspection Method: Announced

Exit Interview: Yes

Weather Conditions: 56°F winds ENE 0-5 MPH

Comments: This was a focused compliance inspection and all DEQ COVID related fieldwork protocols were followed. Facility conditions were observed while on-site and all records were received electronically and reviewed after the on-site portion.

March 23, 2021 Site Visit: Prior to the April 8, 2021 inspection, Shawn Weimer, PRO's Land Protection Manager, performed a site visit at the facility on March 23, 2021, following an odor complaint and request received from one of the landfill's residential neighbors earlier that day. The purpose of the visit was to better understand the facility's operations and to discuss what actions the facility was taking to address odors and any planned actions to be taken as described in the facility's recently developed odor management plan, dated March 12, 2021. Mr. Weimer arrived onsite at approximately 10:30 am, and he met with Greg Harris. During the site visit, the facility's three leachate lagoons were observed, along with the areas where some maintenance was performed to address potential odor sources. A walk along the perimeter of the facility closest to River Road was also performed in order to determine whether any odors were present. During the site visit, minimal odors were observed directly adjacent to the leachate lagoons. No odors were observed at other onsite locations or along the perimeter of the facility near River Road.

Mr. Harris reported that the facility received approval from Chesterfield County to begin adding an odor neutralizing chemical to the leachate lagoons. Mr. Harris reported that a previously exposed drainage area along cell Q was covered and several leachate cleanout pipes associated with the leachate collection system were sealed to prevent odors from escaping from those areas. Mr. Harris reported that the wet weather that the area has experienced recently is believed to be contributing to the increase in odors. As a result, the facility has reportedly increased its daily pumping and hauling of leachate from the facility's lagoons in order to facilitate increased drainage of leachate from the landfill. The facility plans to install permanent H2S monitors in the near future within the waste management boundary and along the facility's perimeter near River Road.

Following the site visit at the landfill, Mr. Weimer met offsite with several of the neighbors who live along River Road. Mr. Weimer provided an update of what actions are being taken by the landfill to address odors. No odors were observed during the discussion and the residents also noted that they did not observe odors at that time.

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 - This facility has associated licensed operators. Operator information is listed at the bottom of the report.
20-81-80	Waste Assessment Program - The 2020 Solid Waste Information Assessment report was submitted on January 27, 2021, prior to the March 31 deadline.
20-81-140.A.17	Record maintained of waste received and processed - Records of waste received and processed were reviewed from November 2020 – March 2021. The facility accepted the following per month: November 2020 – 15,786 tons (highest daily 348 tons) December 2020 – 15,604 tons (highest daily 333 tons) January 2021 – 14,094 tons (highest daily 355 tons) February 2021 – 14,327 tons (highest daily 284 tons) March 2021 – 18,640 tons (highest daily 428 tons) The facility appeared to be in compliance with the maximum allowed per day of 1000 tons.
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 grading in the future Cell N area.
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 in currently active areas 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 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	Hazard and nuisance control - An odor survey was conducted at the facility pre and post the on-site inspection. The temperature was 56°F and the winds were out of the East North East direction at 0 MPH with gusts up to 5 MPH. During the survey, odors were assessed on a scale from 1-5 (1 = Bad, 5=Good). Before arrival on-site, no odors were observed to extend past the 2000 block of Taylor Road. While on-site, no odors were observed. During the on-site inspection, aerators were in operation in leachate lagoons #1 and #3. The aerator was not in operation in leachate lagoon #2. Facility staff stated that it was operating during the first ride around that was conducted today so since not operating now is more than likely a tripped breaker.

	<p>Facility staff continued to state that it would be fixed immediately. Additionally, all lagoons appeared to have sufficient freeboard. Also during the on-site inspection, the working face was smaller than practical. An additional off-site survey was conducted after the on-site survey traveling again from the facility to approximately the 2000 block of Taylor Road and no landfill odors were observed.</p> <p>In order to mitigate the odors/nuisances stemming from several odor complaints received in late December 2020 through mid-January 2021, the Department required the facility to create and submit an Odor Management Plan (OMP) by April 25, 2021. The facility submitted the OMP on March 12, 2021. Starting the week of March 15, 2021, the facility began deploying strategies as listed in the OMP to mitigate the odor complaints/nuisances.</p> <p>Facility staff stated the following items as listed in the OMP have been deployed:</p> <ul style="list-style-type: none"> *A new weather station has been purchased and installed. The weather station measures temperature, barometric pressure and wind speed and direction. *Odoreaze is being applied to the working face and leachate lagoons on a regular basis. *Staff have been covering the entire working face with soil daily. *A mulch filter box was installed at corner toe slope of Cell Q. *Facility staff have been manually monitoring for H2S 2x's per week at the property line closest to where the complaints are coming from, all leachate lagoons and at the toe slopes of Cells P, Q and O. Permanent H2S monitors are planned to be installed in the future. * As complaints are received, facility staff have been visiting the addresses/homes of where the complaints are generated. Facility staff stated that the facility is figuring if additional steps as listed in the Odor Management need to be deployed. Additionally, facility staff mentioned the facility had hired an additional carry truck for additional leachate pump outs since late last year. This is reflected in the leachate pump and haul totals from November 2020 – March 2021. Additionally, facility staff continued to state that they will respond to the complaints going forward and continue to find any factors that could cause odors so they can be remediated to eliminate odors and/or nuisances. <p>From January 14, 2021 – April 17, 2021, a total of 42 odor complaints have been received. All complaints received came from residents that live within 3 miles of the facility and where all regarding sulfur smells. Facility staff mentioned that the odor complaint received on April 7, 2021 was possibly caused by a cap that had been accidentally knocked off of a leachate cleanup pipe near Cell F, which was discovered after the complaint was received. Additionally, facility staff stated that they will respond to future complaints and continue to investigate potential causes of odors so they can work toward more comprehensive mitigation/remediation measures.</p>
20-81-140.C	<p>Compaction and cover - The working face was observed to be as small as 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. Facility staff stated, starting 2 weeks prior to this inspection, daily cover has been being applied to the work face as the end of each working day in order to reduce odors.</p> <p>As mentioned in the inspection on November 17, 2020, the erosion rill on West side of Cell E was observed to be repaired and seeded and additional vegetation was observed on the Southside of Cells A/B, C and D.</p>
20-81-610-660	<p>Special Waste - No special waste requests have been received since the previous inspection. No special wastes were observed during this inspection.</p>
20-81-200	<p>Decomposition gas control - Quarterly landfill gas monitoring events were conducted on November 3, 2020 and February 25, 2021. All monitoring records observed indicated no methane above any action levels in any boundary probes or facility structures.</p>
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 reviewed from November 2020 – March 2021. Monthly totals of leachate hauled are listed below.</p> <p>November 2020 – 702,000 gallons December 2020 – 1,020,000 gallons January 2021 – 228,000 gallons February 2021 – 546,000 gallons March 2021 – 1,350,000 gallons</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	5/31/2021
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.