



# 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

March 26, 2019

Mr. Bruce Coble  
Landfill Manager  
Shoosmith Bros., Inc.  
P.O. Box 2770  
Chesterfield, Virginia 23832

### **NO DEFICIENCY LETTER**

**Re: Shoosmith Sanitary Landfill - Chesterfield County, VA  
Solid Waste Permit No. 587**

Dear Mr. Coble:

On March 5, 2019, the Virginia Department of Environmental Quality Piedmont Regional office staff conducted a 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.

During the inspection, no apparent violations of the Act, Regulations, or SWP 587 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](mailto: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 587



# Compliance Inspection Report

## Inspection Summary

**Facility:** Shoosmith Sanitary Landfill

**Inspector:** Katy Dacey

**Permit:** SWP587

**Inspection Date:** 3/5/2019

**Region:** Piedmont

**Approximate Arrival Time:** 9:00am

**Inspection Type:** Compliance Evaluation Inspection

**Inspection Method:** Announced

**Facility Staff:** Bruce Coble

**Exit Interview:** Yes

**Weather Conditions:** 32 sunny

**Comments:** An odor survey was conducted throughout surrounding area prior to arrival at the facility to investigate odor complaints.

## Sanitary Landfill (Active)

Reference	Description	SL	Result
<b>Compliance Area: Operator Information</b>			
10.1-1408.1	Disclosure Statement	I	✓
10.1-1408.2	Operator Certification	II	✓
<b>Compliance Area: Recordkeeping, Reporting &amp; Permit</b>			
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	✓
<b>Compliance Area: Design, Construction &amp; Operation</b>			
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.B	Compaction, cover & working face	I	✓
20-81-610-660	Special Waste	II	✓
<b>Compliance Area: Closure &amp; Post-Closure Care</b>			
20-81-160	Closure requirements	II	✓
20-81-170	Post-closure care requirements	II	
<b>Compliance Area: Decomposition Gas Control</b>			
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	
<b>Compliance Area: Leachate Control</b>			
20-81-210	Leachate control	II	✓
<b>Compliance Area: Groundwater Monitoring</b>			
20-81-250	Groundwater monitoring program	II	✓
20-81-260	Corrective action program	II	
<b>Compliance Area: Landfill Mining</b>			
20-81-385 & 395	Landfill Mining	II	

### General Comments

Reference	Comments
10.1-1408.1	Disclosure Statement - The disclosure statement is updated as required and listed at the bottom of this report.
10.1-1408.2	Operator Certification - The facility has licensed operators. Operator information is listed at the bottom of this report.
20-81-100.E	Unauthorized waste program and inspection - Unauthorized waste control program is being implemented at this facility. Unauthorized waste inspection records were reviewed from December 21, 2018 through February 4, 2019 and observed to meet the regulatory requirement. Unauthorized waste training was conducted last on November 28, 2018.
20-81-140.A.16	Facility self inspections - Daily facility self inspection records were reviewed from 12/20/2018 through 3/4/2019. Daily inspections included review of cover, litter, road conditions and other activities/additional observations. Monthly facility self inspection records were reviewed from December 2018 – February 2018. Monthly inspections included review of closure cap, intermediate cover, leachate head, culverts, drainage, check dams, silt fences and erosion and sediment controls
20-81-140.A.17	Record maintained of waste received and processed - Monthly waste intake records were reviewed from December 2018 – February 2019. On average, the facility accepted the following tons per month: December 2018 = 86,000 tons January 2019 = 90,000 tons February 2019 = 79,000 tons
20-81-485	Operations Manual - The facility Operations Manual was last re-certified on September 10, 2018 by Bruce Coble 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 September 10, 2019.
20-81-530	Permittee recordkeeping and reporting - No deficiencies in permittee reporting or record keeping requirements were noted during the inspection.
20-81-130	Facility design / construction - Design and construction requirements appear to be properly maintained in accordance with this regulation. Excavation was observed to be complete in future Cell 26E area. Facility staff stated liner application in this area is planned to be begin for March 18, 2019.
20-81-140.A.1,4	Safety and fire control - Safety meetings are held monthly. Records were reviewed for safety meetings conducted on January 9, 2019 and February 6, 2019 and were all observed to be adequate.
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 - The run-on/run-off control systems were observed to be generally maintained appropriately during the inspection.
20-81-140.A.8,14-15	Facility operation, maintenance, and training - Facility access is controlled by scale house, gates, fencing, natural barriers and an scale attendant on duty during operating hours. No access issues were noted. Facility appurtenances were observed to be adequately maintained and operated as designed in the facility permit. Adequate numbers of properly maintained equipment were observed in operation at the two working faces to consist of 2 dozers, 4 compactors, 2 tippers and 1 track hoe.
20-81-140.A.9-13	Hazard and nuisance control - Fugitive dust, mud deposits, birds and other vectors were not observed to be an issue during this inspection. Internal roads were observed to be maintained and passable during the inspection. Minimal on-site landfill gas odor was observed in the vicinity of Cell 23.  An odor survey was conducted in the Highlands neighborhood before the on-site visit from 8:00am to 9:00am in response to complaints received. The temperature was 30 degrees and the winds were out of the East Southeast direction at 0 MPH with gust up to 1 MPH. During the survey, odors are tracked on a 1-10 scale. At the time of the survey, landfill gas odors were observed in the Highlands neighborhood along Eastfair Drive from Fair Isle Drive to Sterling Cove Drive at a level of 2-3, on Kalliope and Amara ranging in levels from 1-2.
20-81-140.B	Compaction, cover & working face - The facility is continuing to fill Cell 26D. The two work faces were observed to be small as practical during the inspection. Soil and Rusmar foam ADC (RusFoam) and continuing to be used as daily cover materials.
20-81-610-660	Special Waste - No special wastes have been received or requested at this facility since the previous inspection. No ACM issues were observed during the inspection.
20-81-160	Closure requirements - Final capping in the Southeast part of Cell 18 (2 acres), Cell 11 (4 acres) and West side of Cell 22/24 are continuing.
20-81-200.A,B,E	Decomposition gas concentrations, monitoring & recordkeeping - The first quarter 2019 landfill gas monitoring event had not occurred prior to this inspection
20-81-210	Leachate control - A small pond of leachate was observed at the base of Cell 26 D/E. Also in this area a pump was observed. Facility staff immediately called facility personnel for maintenance to this area. As requested, a follow-up was sent by facility staff the next day showing the ponded leachate had been cleaned up.  This facility directly discharges leachate to the Chesterfield County sanitary sewer system. The following amounts of leachate

	were discharged for the corresponding months as follows: October 2018: 1,289,045 gallons November 2018: 1,279,852 gallons December 2018: 1,300,619 gallons
20-81-250	Groundwater monitoring program - All groundwater monitoring wells in the compliance network with exception to MW-22 were observed to be labeled and locked. MW-22 was observed to be locked but not labeled.

**Disclosure Statement Details**

Key Personnel	Title
Bruce Coble	
Fletcher Kelly	
Fred Nichols	
Lawrence McGee	
Tim Inge	

Disclosure Statement Last Updated: 11/10/2016

**Waste Management Facility Operators**

Licensed Operator	License #	Expiration Date
Bruce Coble	4605001728	12/31/2019
Tim Inge	4605002080	12/31/2020

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.