



*Commonwealth of Virginia*

**VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY**

PIEDMONT REGIONAL OFFICE  
4949-A Cox Road, Glen Allen, Virginia 23060  
(804) 527-5020 FAX (804) 698-4178  
[www.deq.virginia.gov](http://www.deq.virginia.gov)

Andrew R. Wheeler  
Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus  
Director  
(804) 698-4000

James Golden  
Regional Director

March 1, 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 December 6, 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](mailto: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:** 12/6/2021

**Region:** Piedmont

**Approximate Arrival Time:** 0800

**Inspection Type:** Compliance Evaluation Inspection

**Inspection Method:** Announced

**Facility Staff:** Bruce Coble – Operations Supervisor, Andrea Wortzel – Partner Troutman Pepper

**Exit Interview:** Yes

**Other DEQ Staff:** Aree Reinhardt (Enforcement Specialist), Shawn Weimer (PRO Land Protection Manager)

**Weather Conditions:** Overcast, 48 degrees F, Winds S 0-5 mph

**Comments:** A Compliance Evaluation Inspection (CEI) was conducted in order to review the facility at their current operational condition and for the review period of September through November 2021.

The facility was placing waste in Cells 25, P26, 22, 24, and 26A.

Facility records were requested to be submitted electronically in order to determine compliance for the review period.

## 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	X
20-81-100.E	Unauthorized waste program and inspection	II	✓
20-81-140.A.16	Facility self inspections	I	X
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	

SL = Severity Level

✓ = In Compliance

X = Alleged Violation

N/A = Not Applicable

Blank = Not Inspected

### Alleged Violations

Reference	Comments
20-81-100.B	<p>Compliance with the facility's permit - Operational documents and records were requested on December 2 and 7, 2021, as per Permit Condition I.B.6. As of January 26, 2022, the following documents had not been received:</p> <p>Unauthorized Waste Random Load Inspection forms for September 2021; Facility Self-Inspection forms from July 2020 through November 2021; Operations Manual Appendices III, IV, V, and VIII; Total tonnage of Processed tires and Treated Regulated Medical Waste (RMW) received during the review period.</p> <p>However, on February 8, 2022, prior to an Enforcement meeting with Shoosmith representatives and their Counsel later that day, Landfill Operations Supervisor Bruce Coble submitted electronically all the documents not submitted thus far, with the exception of the Facility Self-Inspection forms from July 2020 through November 2021.</p>
20-81-140.A.16	<p>Facility self inspections - According to the facility Operations Manual, dated on December 31, 2019, daily, weekly, and monthly inspections are conducted to ensure proper operational conditions. During previous compliance inspections, copies of site facility inspection logs, from July 2020 through August 2021, were requested on December 16, 2020, December 29, 2020, January 4, 2021, February 25, 2021, July 1, 2021, and lastly on September 15, 2021. Also on December 2, and 7, 2021, additional records were requested to be submitted but not received as of January 26, 2022.</p> <p>Record submission requirements are addressed under 20-81-100.B.</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: <a href="https://www.deq.virginia.gov/permits-regulations/permits/waste/solid-waste">https://www.deq.virginia.gov/permits-regulations/permits/waste/solid-waste</a> under "Solid Waste Permit" -&gt; "Notice of Intent" -&gt; "Relevant Forms" -&gt; "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>
20-81-100.E	<p>Unauthorized waste program and inspection - A Control Program for Unauthorized Waste (UAW) Is documented and was last revised on October 29, 2020. UAW training took place on December 1, 2021, for all required personnel, including personnel performing Unauthorized Waste (UAW) Random Load Inspections (RLI).</p> <p>Records of UAW-RLI performed between September and November 2021 were submitted on December 5, 2021, to determine compliance to the required 1% monthly inspection rate for in-state loads.</p> <p>Facility records submitted for review indicated that RLI's conducted in October and November 2021 met the 1% requirement for in-state loads.</p> <p>However the RLI records requested and submitted for September 2021 were unreadable as an electronic file. Notification was sent on December 7, 2021, indicating the bad file and requested the records for September be resubmitted, which have not been received.</p> <p>A replacement file was submitted on February 8, 2022, and appeared to show compliance.</p> <p>Mr. Coble stated that no out of state loads were received and no discoveries of unauthorized waste were discovered during the review period.</p>

20-81-140.A.17	<p>Record maintained of waste received and processed - The facility is permitted for a maximum daily disposal rate of 5350 tons per day.</p> <p>Monthly intake records for September through November 2021 was requested for review indicating total monthly intake and the highest daily amount received during each month.</p> <p>Facility records noted the following:</p> <p>Month/Year ----- Total in Tons ---- Highest Daily Receipt</p> <p>Sept-2021 ----- 79,263 ----- 3721 tons on 9-28;  Oct-2021 ----- 70,965 ----- 3586 tons on 10-25;  Nov-2021 ----- 76,169 ----- 3521 tons on 11-1.</p> <p>Facility stated no out of state waste was accepted/landfilled during the review period.</p> <p>Monthly intake for sludge between September and November 2021, totaled 4466 tons.</p> <p>Additional records for totals of waste received from January to November 2021, specifically shredded or cut tires and treated Regulated Medical Waste, was requested on December 7, 2021, but as of January 26, 2022, no records had been received.</p> <p>However on February 8, 2022, the missing requested documentation were received for compliance review.</p>
20-81-485	<p>Operations Manual - During the review period, Agency files indicated the facility Operations Manual was last revised December 31, 2019, and listed plans specified in the VSWMR.</p> <p>A request was sent to Operations Manager, Mr. Bruce Coble, requesting Shoosmith to submit electronic copies of the Operations Manual, noted revised in 2020, and all Appendices (Plans). As of January 26, 2022, no copies of the missing Plans, and Appendices requested, had been submitted for review.</p> <p>However, on February 8, 2022, the remaining missing requested documents were received and indicated that the Operations Manual on file with DEQ, dated December 19, 2019, required updating, as specific plans within the Manual had been updated in October of 2020.</p> <p>Finally, on February 23, 2022, a revised Operations Manual, dated December 30, 2021, along with a signed Certification Statement page dated on December 31, 2022, was received from Mr. Coble and appeared complete. No Appendices were included in which an email was sent requesting copies of plans that have changed since the last submission. No updates have been received as of February 28, 2022.</p> <p>Re-certification of the Operations Manual is due by December 31, 2022.</p>
20-81-530	<p>Permittee recordkeeping and reporting - No reportable issues were received during the review period.</p>
20-81-130	<p>Facility design / construction - No design changes were noted during the review period.</p> <p>Construction activities associated with expansion of the landfill gas management network continues to move forward with installation of gas wells, header lines, and condensate lines throughout the landfill.</p>
20-81-140.A.1,4	<p>Safety and fire control - Monthly safety training records were reviewed for September through November 2021, and appeared adequate. All training records and associated documents are maintained onsite for review.</p> <p>No open burning was noted during the onsite review.</p>
20-81-140.A.6	<p>Pollutant discharge - No pollutants or solid wastes were observed entering into surface waters, ground waters, or waters of the United States.</p>
20-81-140.A.7	<p>Stormwater control system maintenance - The run-on/runoff control systems constructed around the landfill appear to be undergoing maintenance to clear storm channels and sediment basins.</p> <p>The control system includes 5 sediment basins used to control runoff in order to reduce the chance of discharging pollutants into waters of the United States.</p> <p>Maintenance on Sediment Basin 11 was observed to include removal of built up sediment near the inlet where stormwater enters the temporary forebay.</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 the top-side workface appeared adequate with 1 tipper, 2 dozers, an excavator, and 3</p>

	<p>compactors.</p> <p>Facility equipment operating at Cell 25 appeared adequate with 1 dozer and 1 compactor.</p>
20-81-140.A.9-13	<p>Hazard and nuisance control - Blown litter was noted as minimal around the landfill. No litter picking was occurring during the onsite visit.</p> <p>One area of excess litter was noted but associated with the County Waste MRF (PBR571) operation. After contacting the County Waste Operations Manager Tony Wade, the litter was picked and photos sent to show compliance.</p> <p>No odors were detected during the onsite inspection.</p> <p>There were no observed disease vectors during the onsite inspection.</p> <p>Salvaging was not occurring during the onsite inspection.</p> <p>Fugitive dust is controlled by an onsite water truck and street sweeper.</p> <p>Internal roads are maintained and were passable by ordinary vehicles.</p>
20-81-140.B	<p>Compaction, cover &amp; working face - The facility appears to be spreading, compacting, and confining the workface area as small as practicable based on waste received, machinery available, and equipment operators onsite. The facility was filling in Cells 25, P26, 22, 24, and 26A, during the onsite inspection.</p> <p>Clean soil and RusFoam, an approved ADC, are reported used as daily cover. Three (3) days of clean cover soil was noted stockpiled in close proximity to the workface on top of Cells P26, 22, 24, and 26A, during the onsite inspection. No stockpile of soil was noted at the workface in Cell 25. RusFoam is reported to be used as an ADC, but only in dry conditions.</p> <p>Vegetation on the side slopes of the closed landfill cells appeared to well established and mowed within the past year.</p> <p>Slope angles at the landfill capped area appeared to not exceed 33% on the capped portions.</p> <p>No prohibited wastes were noted in the waste mass during the onsite inspection or noted as received during the review period.</p>
20-81-610-660	<p>Special Waste - There were no special wastes noted being managed at the facility during the time of the inspection.</p> <p>Mr. Coble reported no material containing PCB, ACM, or PCS was disposed at the landfill during the review period.</p> <p>Operations Manager, Bruce Coble, stated that tires are no longer processed onsite (shredding/grinding) but are shipped off-site for proper processing. Mr. Coble stated that shredded and split tires are received from Lucky Dog Trucking, processed from their location on Iron Bridge Road, as well as chipped tires from The Tire Recyclers in Charles City County. Processed tires are placed in the landfill after which whole tires collected onsite are placed in empty trailers and sent for processing.</p> <p>Totals of processed tires received for disposal was requested but not received as of January 26, 2022. Documents submitted previously stated no tires had been received for disposal. No records of tires shipped off-site for processing were received either.</p> <p>However on February 8, 2022, a revised Waste Acceptance report was received indicating that 284 tons of split tires and 7350 tons of tire chips had been received and disposed of in the waste mass for the review period.</p> <p>No white goods were reported as received for recycling during the review period.</p>
20-81-200.A,B,E	<p>Decomposition gas concentrations, monitoring &amp; recordkeeping - 3rd Qtr. 2021 Gas Probe monitoring was conducted on September 30, 2021, and recorded no exceedances of the standard.</p> <p>4th Qtr. 2021 Gas Probe monitoring was conducted on November 24, 2021, and recorded no exceedances of the standard.</p>
20-81-200.D	<p>Decomposition gas-odor management - The facility maintains an active Odor Management and Control Plan (OMCP), revised August 30, 2019, and reviewed annually. Last annual review was conducted and submitted on March 1, 2021, for operational year 2020.</p> <p>The facility submitted an odor log for 2021, for complaints received directly (via phone, email, or text message) for review. The log lists Reporter name, date, time, location, weather, and observation. The log listed three complaints received during the current review period. All complaints indicated landfill gas was the complaint and were attributed to the ongoing gas line construction.</p> <p>The facility also maintains a log of complaints received via the Electronic Odor Tracker (EOT) website. The log listed 83 complaints received during the current review period. Complaints reported landfill gas and trash odor was detected. Tracking log</p>

	noted reporters name, date, time, location, odor description, Report number, and meteorological data.
20-81-210	<p>Leachate control - Shoosmith directly discharges leachate to the Chesterfield County Sanitary Sewer System (CTP0023).</p> <p>Total leachate discharged was reported as follows:</p> <p>September 2021 = 974,148 gallons;  October 2021 = 712,475 gallons;  November 2021 = 676,480 gallons.</p> <p>Leachate seeps were noted flowing into trenches dug where gas header lines were placed at Cell 26A.</p> <p>Sediment Basin 11 appeared to show signs of ongoing remediation work with sediment being removed from the temporary forebay.</p> <p>It was noted that leachate continues be pumped out of Cell 25 with the use of a 16" open pipe, that extends down to the liner, installed in the eastern section of the cell. It was installed during construction to control pooling leachate and has been used since to remove leachate off the liner and cell. The facility uses a hose and pneumatic surface pump to transport the liquids out of the pipe and into the sump at Cell 23.</p> <p>Leachate levels within Sumps 22, 23, 24 and 26, are recorded monthly. All sumps are reported at a depth of 24" below the liner which a reading of greater than 36" would indicate an exceedance of leachate over the liner.</p> <p>Records of levels for each month during the review period were submitted for review and appeared to show compliance.</p>
20-81-250	<p>Groundwater monitoring program - All Groundwater Compliance Monitoring wells were reviewed for operational condition, closed, locked, labeled, and concrete aprons in good condition.</p> <p>During the onsite inspection it was noted that GWMW-104D concrete apron had been damaged which the apron was cracked on one corner. The base beneath GWMW-22 appeared washed out which would allow ground water to potentially contaminate the sampling and damage the well operation. GWMW-8R2 was not secure as the lock on the well wasn't long enough to lock in place. Lastly GWMW-6 had a hole rusted in the caisson near where it meets the apron.</p> <p>On February 17, 2022, Mr. Coble submitted photographic evidence of all repairs made to GWMW issues noted above. Ensure all GWMW's are maintained in good operational condition.</p>

### 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.**