



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

Travis A. Voyles
Acting Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus
Director
(804) 698-4020

Jerome A. Brooks
Regional Director

June 16, 2022

Mr. Jerry Cifor
President
Green Ridge Recycling and Disposal LLC
12230 Deergrove Road
Midlothian, Virginia 23112

**Subject: Green Ridge Recycling and Disposal Facility, LLC
Notice of Intent and Part A Application – Technical Review 2**

Dear Mr. Cifor:

The Virginia Department of Environmental Quality (DEQ) Piedmont Regional Office (PRO) is in receipt of a Notice of Intent (NOI) and Part A Permit Application for the Green Ridge Recycling and Disposal Facility, LLC, dated January 17th and received on January 22, 2020. Additional information was received by the Department April 16, 2020 and October 28, 2020 regarding Disclosure Statements, January 08, 2021 regarding the Demonstration of Need, and February 16, 2021 regarding Public Water Supplies. The NOI and Part A Permit Application, and supplemental information, was prepared by Draper Aden Associates, LLC, on behalf of the Green Ridge Recycling and Disposal Facility, LLC.

The NOI and Part A Permit Application were reviewed for administrative completeness in accordance with § 9 VAC 20-81-450.A, B, and C, § 9 VAC 20-81-460, and § 9 VAC 20-81-120 of the Virginia Solid Waste Management Regulations (VSWMR, 9 VAC 20-81-10, *et seq.*) and found to be ***administratively complete*** in a Final Completeness Review letter dated December 11, 2020. The application was subsequently reviewed for technical adequacy and regulatory compliance and found to be ***technically inadequate*** in the Department's first technical review, dated April 08, 2021.

The facility submitted a "Response to Technical Review 1," with 16 Attachments, dated October 01, 2021, and submitted a "Supplement to Response TR-1," with 7 Attachments, dated April 13, 2022, prepared by Draper Aden Associates and Schnabel Engineering, P.C.

Subsequently, this application has been reviewed for technical adequacy and regulatory compliance. Based on this technical review, the Part A Permit Application appears to be ***technically inadequate*** and the following items need to be addressed in a subsequent revision:

- 1.) The facility responses and supplemental information contain various updates to the base grade elevation, and other pertinent information relating to the proposed facility. The Response to Technical Review 1 revised the lowest base grade elevation to 276.63 above mean seal level (AMSL). The Supplement to Response TR-1 revised the lowest base grade elevation to 286.45 AMSL. The Part A Form and Part A Application, cross-sections and reports should be revised as necessary to include the most current updated lowest base grade elevation.
- 2.) The October Response to Technical Review 1 included several drawings, cross-sections and reports with revised waste management and disposal unit boundaries. The waste management and disposal unit boundaries are depicted in bearings and distances. The Near Vicinity Map and Figures B and C should include a survey tie line from the metes and bounds facility boundary survey, to the bearings and distances used in the waste management and disposal unit boundary surveys.
- 3.) Drawings and reports in the Part A Application that include incorrect or inconsistent waste management boundaries, disposal unit boundaries, base grade, cross-sections, or other facility information should be updated and replaced. A licensed professional engineer or geologist should stamp all revised drawings.

Additional work is ongoing to address all permits and requirements necessary for this project. It is recommended that the Part A Form, and the Part A NOI and Application, be revised to include all supplemental and updated facility information, reports, cross-sections, and drawings, as discussed above, and re-submitted to the Department.

Please note the letter should not be considered a legal opinion or a case decision as defined by the Administrative Process Act, Code of Virginia § 2.2-4000 *et seq.* If you have any questions about this matter, please contact me at (804) 712-9102, or by e-mail at dean.starook@deq.virginia.gov.

Sincerely,



Dean E. Starook
Groundwater Remediation Specialist

cc: Michael D. Lawless, P.G., C.P.G., Draper Aden Associates
Lynn P. Klappich, Draper Aden Associates
JengHwa Lyang, DEQ-VRO
Shawn Weimer, DEQ-PRO