

May 12, 2023

Mr. Dean E. Starook, Groundwater Remediation Specialist
Virginia Department of Environmental Quality
Piedmont Regional Office
4949-A Cox Road
Glen Allen, Virginia 23060

Electronically submitted to: Starook, Dean dean.starook@deq.virginia.gov

**RE: Green Ridge Recycling and Disposal Facility, LLC
SWP 626
Notice of Intent and Part A Application – Technical Review 2 (06/16/2022)
Response to Technical Review 2
DAA Job Number: 18020117-090102 (TRC 17319)**

Dear Mr. Starook:

On behalf of Green Ridge Recycling and Disposal Facility, LLC (Green Ridge), TRC Companies, LLC (formerly Draper Aden Associates) is pleased to submit responses to DEQ's Technical Review 2 (TR 2), dated June 16, 2022. The TR 2 letter is included with this submittal as **ATTACHMENT 01**. Your letter requested clarification of several items and a final updated Part A application incorporating previous responses. A response letter to the TR 2 addendum is being provided under separate cover.

Based on multiple discussions with DEQ it is our understanding that, unless there was a specific comment included in TR 2, all information provided in the TR 1 (October 21, 2021) response, and the TR 1 Supplement (April 13, 2022) response has been accepted as technically adequate at this time. This information has been incorporated into the updated Part A application as applicable.

Listed below, as they appeared in TR 2, are the DEQ comments (in italics), followed by our corresponding response.

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.*

Response: As provided in the TR 1 Supplement response, the lowest base grade elevation is 287.47 AMSL. It is unclear where the DEQ elevation of 286.45 came from. The PTA Form was not revised for the TR 1 Supplement pending approval of the submittal by DEQ. The resubmitted DEQ PTA Form and transmittal

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letter have been updated to incorporate the TR 1 Supplement information and included in the updated Part A application. The updated form is attached here as **ATTACHMENT 02**.

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.*

Response:

Included in Attachment PTA-IX (Update - dated May 12, 2023) are the following documents:

- An updated Near Vicinity Map (PTA Attachment IX – Figure 2A) dated May 12, 2023;
- An updated Facility Boundary exhibit with metes and bounds (PTA Attachment IX – Figure 2B) dated May 12, 2023;
- An updated Waste Management Boundary exhibit with bearings and distances (PTA Attachment IX – Figure 2C) dated May 12, 2023; and
- An updated Initial Disposal Unit Area exhibit with bearings and distances (PTA Attachment IX – Figure 2D) dated May 12, 2023.

Figure 2A does not include any metes/bounds or bearings/distances due to the complexity and scale of the drawing. (This was discussed in the TR 1 response.) Instead separate figures are provided (Figure 2B, 2C and Figure 2D). Figure 2B is tied to state plane with coordinates indicated on three monuments identified on the figure. Figure 2C is now tied to the property line which is now tied to state plane. Figure 2D is provided for informational purposes and represents the initial disposal unit area. It is also tied to the property line.

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.*

Response: As requested, an updated Part A application incorporating previous responses including drawings and reports has been prepared. The updated Part A application, provided in DRAFT for review by DEQ dated May 12, 2023, is provided under separate cover. As appropriate, a licensed professional engineer or geologist has reviewed the documentation and the DRAFT documents include the required seal. The final set to be submitted to DEQ will include the seal, signature and date.

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

Mr. Dean E. Starook
May 12, 2023
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supplemental and updated facility information, reports, cross-sections, and drawings, as discussed above, and re-submitted to the Department.

Response: Our response to Comment 3 above addresses this summation paragraph. The updated application explains changes and/or modifications to previous documents.

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With the updated DRAFT Part A (with changes highlighted), DEQ should have all information needed to complete its review of the Part A and to ultimately provide approval. Once the DRAFT is accepted a final and complete document (without changes noted) will be submitted for final processing. Your timely review is greatly appreciated.

Should you have any questions or require additional information, please contact Ms. Wendy Karably at wkarably@trccompanies.com or Mr. Mike Lawless at mlawless@trccompanies.com.

Sincerely,

DRAPER ADEN ASSOCIATES



Michael D. Lawless, P.G, CPG
Principal

Letter Attachments:

Attachment 01 VDEQ – June 16, 2022 - TR 2 comment letter
Attachment 02 PTA Form revised

cc: Kathryn Perszyk, DEQ-CO
 Shawn Weimer, DEQ-PRO
 Jerry Cifor, Green Ridge
 Will Shewmake, Woods Rogers Vandeventer Black
 Wendy Karably, TRC Companies, Inc.
 Lynn P. Klappich, TRC Companies, Inc.
 Debbie Coakley, TRC Companies, Inc.

ATTACHMENT 01

VDEQ June 16, 2022 – TR 2 Comments



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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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

ATTACHMENT 02

PTA Form revised



Solid Waste Disposal Facility Part A Application Form, DEQ Form SW PTA

Please specify, is this application for a ☒ New Facility or ☐ Part A Modification

TR 2 – Updated – replaces TR-1 submitted form and incorporates TR 1 Supplement and TR 2 information.

I. FACILITY INFORMATION

A. Facility Location

Facility Name: Green Ridge Recycling and Disposal Facility **Permit No. SWP** 626
Location Address: US Route 60/Pinegrove Road/Miller Lane **Facility Type:** Sanitary Landfill
City, State, Zip: Cumberland, VA 23040
Latitude: 37 Deg 34 Min 00 Sec North **Longitude:** 78 Deg 07 Min 20 Sec West

B. Facility Contact Information

Contact Person: Mr. Jerry Cifor **Contact Title:** President and CEO
Contact Phone: 802-379-1575 **Contact E-mail:** jerry.cifor@myfairpoint.net
Owner: Green Ridge Recycling and Disposal Facility, LLC **Operator:** Green Ridge Recycling and Disposal Facility, LLC
Mailing Address: 12230 Deer Grove Road **Mailing Address:** 12230 Deer Grove Road
City, State, Zip: Midlothian, VA 23112 **City, State, Zip:** Midlothian, VA 23112

C. Solid Waste Disposal Facility Information

Total Property Acreage: 1,177.63 acres **Facility Boundary:** 1,177.63 acres
Waste Management Boundary Acreage: 428.0 acres **Total Capacity:** 54,000,000 cubic yards
Maximum Elevation: 690 ft AMSL **Total Number of Borings:** 74 (TR-1)
Lowest Base grade Elevation: 287.47 ft AMSL **Daily Disposal Limit:** 1,500 tons/day(TR-2)
(TR 1 Supplement information)

II. SITING ASSESSMENT

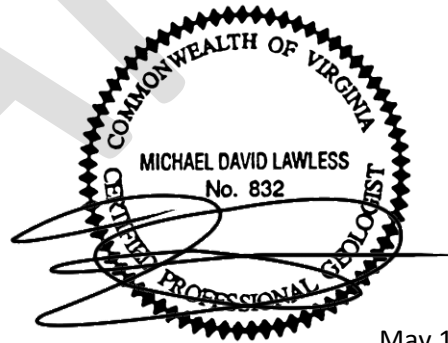
A. Applicable to All Solid Waste Disposal Facilities

Answer the following questions by entering "yes", "no", or a numeric response, as applicable. For distances, indicate the shortest measured distance from any disposal unit or leachate storage area (i.e. waste management boundary), reported in feet.

| Siting Criteria | Response |
|---|--------------------|
| 1. Is the landfill located in a 100 year floodplain? | No |
| 2. Is the landfill located in a geologically stable area? | Yes |
| 3.a.i. Distance to nearest residence: | 510 ft |
| 3.a.ii. Distance to nearest school: | Approx. 7.7 miles |
| 3.a.iii. Distance to nearest daycare center: | Approx. 7.5 miles |
| 3.a.iv. Distance to nearest hospital: | Approx. 23.0 miles |
| 3.a.v. Distance to nearest nursing home: | Approx. 7.5 miles |
| 3.a.vi. Distance to nearest recreational park: | Approx. 3.0 miles |
| 3.b. Distance from any perennial stream or river: | >100 ft |
| 3.c. Distance from the Facility Boundary: | >200 ft |
| 3.d. Distance from any well, spring, or other groundwater source of drinking water in existence at the time of application: | 500+ ft |
| 3.e. Distance from the nearest edge of right-of-way of any interstate or primary highway: | 3,960+ ft |
| 3.f. Distance from the nearest edge of right-of-way of any other highway or city street: | 285+ ft |

| Siting Criteria | Response |
|--|----------|
| 4. Is the landfill located in a park or recreational area, wildlife management area or area designated by the federal or state agency as the critical habitat of any endangered species? | No |
| 5.a. Does the facility have the ability to conduct groundwater monitoring in accordance with 9 VAC 20-81-250? | Yes |
| 5.b. Does the facility have the ability to characterize the rate and direction of groundwater flow within the uppermost aquifer? | Yes |
| 5.c. Does the facility have the ability to characterize and define any releases from the landfill, so as to determine what corrective actions are necessary? | Yes |
| 5.d. Does the facility have the ability to perform corrective action as necessary? | Yes |
| 6. Is the landfill located in a tidal or nontidal wetland? (Yes or No) | No |
| 6.a. If the answer to #6 is "yes" list the total number of nontidal wetland acres to be impacted: | NA |
| 7.a. Does the proposed site include excessive slopes (greater than 33%)? | No |
| 7.b. Does the proposed site lack readily available cover materials or lack of a firm commitment for adequate cover material from a borrow site? | No |
| 7.c. Does the proposed site contain springs, seeps, or other ground water intrusion? | No |
| 7.d. Does the proposed site contain gas, water, sewage, or electrical or other transmission lines? | Yes |
| 7.e. Does the site contain the prior existence of an open dump, unpermitted landfill, lagoon, or similar unit, even if such a unit is closed? | No |
| 8. Does the facility have adequate area and terrain for leachate management? | Yes |

Professional Geologist or Professional Engineer
Certification: To the best of my knowledge, information and belief, the answers to question number 5.a. through 5.d. are, in my professional opinion, in compliance with applicable laws, codes, and ordinances. (Stamp, sign, and date in space to right)



B. Additional Siting Criteria for Sanitary Landfills

May 12, 2023

The following criteria are only applicable to sanitary landfills. Answer the following questions by entering "yes", "no", or a numeric response, as applicable. For distances, indicate the shortest measured distance from any disposal unit or leachate storage area (i.e. waste management boundary), reported in feet or miles.

| Siting Criteria | Response |
|--|------------|
| 9.a. Distance to existing surface or groundwater public water supply intake or reservoir that are downgradient of the landfill (in miles): | 15.7 miles |
| 9.b. Distance to existing surface or ground water public water supply intake or reservoir that are upgradient of the landfill (in miles): | 3.96 miles |
| 9.c. Is the landfill located in an area vulnerable to flooding caused by dam failures? | No |
| 9.d. Is the landfill located over a sinkhole or within 100 feet of a solution cavern associated with karst topography? | No |
| 9.e. Is the landfill located over a fault that has had displacement in Holocene time? | No |
| 9.f. Distance from a fault that has had displacement in Holocene time (in feet): | 200+ ft |
| 9.g. Is the landfill located within a seismic impact zone? | Yes |
| 9.h. Distance from any airport runway end used by turbojet or piston-type aircraft: | >13 miles |

C. Additional Siting Criteria for Construction, Demolition, & Debris Landfills

The following criteria are only applicable to construction, demolition, and debris (CDD) landfills. Answer the following questions by entering "yes", "no", or a numeric response, as applicable. For distances, indicate the shortest measured distance from any disposal unit or leachate storage area (i.e. waste management boundary), reported in feet or miles.

| Siting Criteria | Response |
|---|----------|
| 10.a. Is the facility located in a strip mine pit? | No |
| 10.b. If the answer to #10.a. is "yes", indicate minimum distance between coal seams / coal outcrops and solid waste materials. | n/a |

D. Variances

Does this application include a variance request(s) to regulatory siting requirements? ☐ Yes ☒ No

If yes, list regulatory citation(s): _____

III. PART A APPLICATION ATTACHMENTS

The following items shall be provided as an attachment to this form and will constitute the facility's Solid Waste Part A Permit application. Please indicate whether each item is 'included' for the proposed facility or facility modification.

| Solid Waste Permit Part A Application Attachments | Included? |
|---|-------------------------------------|
| Attachment I: Cover Letter, Area Map, and Site Location Map | <input checked="" type="checkbox"/> |
| Attachment II: Disclosure Statements (DEQ Forms DISC-01 and DISC-02) | <input checked="" type="checkbox"/> |
| Attachment III: Local Government Certification (DEQ Form SW-11-1) | <input checked="" type="checkbox"/> |
| Attachment IV: Public Participation Documentation | <input checked="" type="checkbox"/> |
| Attachment V: Disposal Capacity Guarantee | <input checked="" type="checkbox"/> |
| Attachment VI: Host Agreement (DEQ Form SW-11-2) or Discussion of Disposal Limits/Service Area | <input checked="" type="checkbox"/> |
| Attachment VII: Demonstration of Need | <input checked="" type="checkbox"/> |
| Attachment VIII: State Commission Corporation Certification | <input checked="" type="checkbox"/> |
| Attachment IX: Key Map, Near-Vicinity Map, and Regional Map | <input checked="" type="checkbox"/> |
| Attachment X: Proof of Ownership Documents | <input checked="" type="checkbox"/> |
| Attachment XI: Hydrogeologic and Geotechnical Report (must be certified by P.E. or P.G.) | <input checked="" type="checkbox"/> |
| Attachment XII: Location of Borings and Boring Logs | <input checked="" type="checkbox"/> |
| Attachment XIII: Laboratory and Field Data | <input checked="" type="checkbox"/> |
| Attachment XIV: Materials Volume Calculations | <input checked="" type="checkbox"/> |
| Attachment XV: Geologic Maps, Orthogonal Cross-Sections, and Potentiometric Surface Maps | <input checked="" type="checkbox"/> |
| Attachment XVI: VDOT Adequacy Report and Approval Letter | <input checked="" type="checkbox"/> |
| Attachment XVII: Landfill Impact Statement | <input checked="" type="checkbox"/> |
| Attachment XVIII: Certification and Documentation of Adjacent Property Owner Notification | <input checked="" type="checkbox"/> |
| Attachment XIX: Discussion of Public Interest Served | <input checked="" type="checkbox"/> |
| Attachment XX: Airport Proximity and Agency Coordination | <input checked="" type="checkbox"/> |
| Attachment XXI: FEMA Flood Insurance Rate Map | <input checked="" type="checkbox"/> |
| Attachment XXII: Wetlands Demonstration and Agency Coordination | <input checked="" type="checkbox"/> |
| Attachment XXIII: Demonstration Regarding Proximity to a Fault or Siting within a Seismic Impact Zone | <input checked="" type="checkbox"/> |
| Attachment XXIV: Request for Exemption of Site for 9 VAC 20-81-120.D. and/or 120.F. | <input type="checkbox"/> |

IV. RESPONSIBLE OFFICIAL SIGNATURE

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate, and complete.

SIGNATURE: _____ DATE: _____

NAME: Mr. Jerry Cifor

TITLE: President and CEO - Green Ridge Recycling and Disposal, LLC

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