

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 – Addendum to Technical Review 2 (10/25/2022)
Response to Technical Review 2 Addendum
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 Virginia Department of Environmental Quality's (DEQ) Technical Review 2 Addendum, dated October 25, 2022. The Technical Review 2 addendum (TR 2 ADD) letter is included with this submittal as **ATTACHMENT 01**. Your letter requested clarification of several issues relative to perennial streams and the potential need for a variance request. Listed below, as they appeared in the DEQ's TR 2 ADD, are the DEQ comments (in italics), followed by our corresponding response:

The Virginia Department of Environmental Quality (DEQ) Piedmont Regional Office (PRO) solid waste program is coordinating its review of the Notice of Intent (NOI) and Part A Permit Application for the Green Ridge Recycling and Disposal Facility, LLC, with the Virginia Water Protection (VWP) program staff. Based on review of the Joint Permit Application (JPA) received by the VWP program, the proposed project will impact perennial stream resources located within the area of proposed disposal units. It appears that these streams within the disposal area are fed by springs or groundwater seeps.

Response: As has been reviewed with DEQ, Green Ridge has reconfigured the initial disposal unit area. Figure 1, which was prepared for the TR 2 response and is included herein as **ATTACHMENT 02**, illustrates the proposed initial disposal unit area. The initial disposal unit area will not impact wetlands or streams that would require a permit from ACOE or the DEQ VWP program. This includes consideration of both primary and secondary impacts. Hence, the JPA was withdrawn on _____ and the Part A has been updated accordingly.

DRAFT

*The Virginia Solid Waste Management Regulations (VSWMR, 9 VAC 20-81-10, et seq.) siting requirements as specified in 9 VAC 20-81-120.C.1.b. state, “**No disposal unit or leachate storage unit shall be closer than: ... 100 feet from any perennial stream or river.**” Additionally, 9 VAC 20-81-120.F.1.c. states, “**Certain site characteristics may prevent approval or require substantial limitations on the site use or require the incorporation of sound engineering controls. Such site characteristics shall be identified and an explanation of precautions necessary to assure compliance with the provisions of this chapter shall be provided. Examples include:...Springs, seeps, or other groundwater intrusion into the site;...**” The Part A Application Form, and portions of the NOI and Part A Permit Application, indicate that the distance from proposed disposal units or leachate storage areas to any perennial stream or river is 100 feet, and there are no springs present.*

Response: The initial disposal unit area meets the siting requirements of VSWMR 9 VAC 20-81-120.C.1.b.

Based on information provided in the VWP application, the waste management boundary encompassing the proposed landfill disposal and leachate storage units does not appear to meet the VSWMR siting requirements nor has DEQ received a request for a variance to the permitting requirements as described in Part VII of the VSWMR (9 VAC 20-81-700 through 760). Please be advised that DEQ cannot determine site suitability until such time that the proposed landfill meets the VSWMR siting requirements and the applicable revisions to the NOI and Part A Permit Application have been submitted to DEQ, or DEQ receives revised copies of the NOI and Part A Permit Application and associated permit application documents demonstrating impacts to springs and perennial streams within proposed disposal and leachate storage areas and a request for a variance from the permitting requirements.

Response: The VWP application (aka JPA) was withdrawn on _____. The Part A application has been updated to reflect this. Based on the initial disposal unit area, the siting requirements are met and a variance is not required.

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We believe that the narrative above addresses the comments submitted by DEQ.

Mr. Dean E. Starook
May 12, 2023
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DRAFT

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

A handwritten signature in black ink, appearing to read 'Michael D. Lawless', with a horizontal line extending to the right.

Michael D. Lawless, P.G, CPG
Principal

Letter Attachments:

Attachment 01 VDEQ October 25, 2022 – letter Addendum
Attachment 02 Figure1, Overall Site Layout, prepared by TRC, dated May 12, 2023

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 October 25, 2022 – letter addendum



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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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

October 25, 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 – Addendum to Technical Review 2
(dated June 16, 2022)**

Dear Mr. Cifor:

The Virginia Department of Environmental Quality (DEQ) Piedmont Regional Office (PRO) solid waste program is coordinating its review of the Notice of Intent (NOI) and Part A Permit Application for the Green Ridge Recycling and Disposal Facility, LLC, with the Virginia Water Protection (VWP) program staff. DEQ issued a second technical review letter dated June 16, 2022 indicating that the Part A Permit Application appears to be *technically inadequate* and it outlined items that need to be addressed. Based on review of the Joint Permit Application (JPA) received by the VWP program, the proposed project will impact perennial stream resources located within the area of proposed disposal units. It appears that these streams within the disposal area are fed by springs or groundwater seeps.

The Virginia Solid Waste Management Regulations (VSWMR, 9 VAC 20-81-10, *et seq.*) siting requirements as specified in 9 VAC 20-81-120.C.1.b. state, ***“No disposal unit or leachate storage unit shall be closer than: ... 100 feet from any perennial stream or river.”*** Additionally, 9 VAC 20-81-120.F.1.c. states, ***“Certain site characteristics may prevent approval or require substantial limitations on the site use or require the incorporation of sound engineering controls. Such site characteristics shall be identified and an explanation of precautions necessary to assure compliance with the provisions of this chapter shall be provided. Examples include:...Springs, seeps, or other groundwater intrusion into the site;...”*** The Part A Application Form, and portions of the NOI and Part A Permit Application, indicate that the distance from proposed disposal units or leachate storage areas to any perennial stream or river is 100 feet, and there are no springs present.

Based on information provided in the VWP application, the waste management boundary encompassing the proposed landfill disposal and leachate storage units does not appear to meet the VSWMR siting requirements nor has DEQ received a request for a variance to the permitting requirements as described in Part VII of the VSWMR (9 VAC 20-81-700 through 760). Please be advised that DEQ cannot determine site suitability until such time that the proposed landfill meets the VSWMR siting requirements and the applicable revisions to the NOI and Part A Permit Application have been submitted to DEQ, or DEQ receives revised copies of the NOI and Part A Permit Application and associated permit application documents demonstrating impacts to springs and perennial streams within proposed disposal and leachate storage areas and a request for a variance from the permitting requirements.

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,



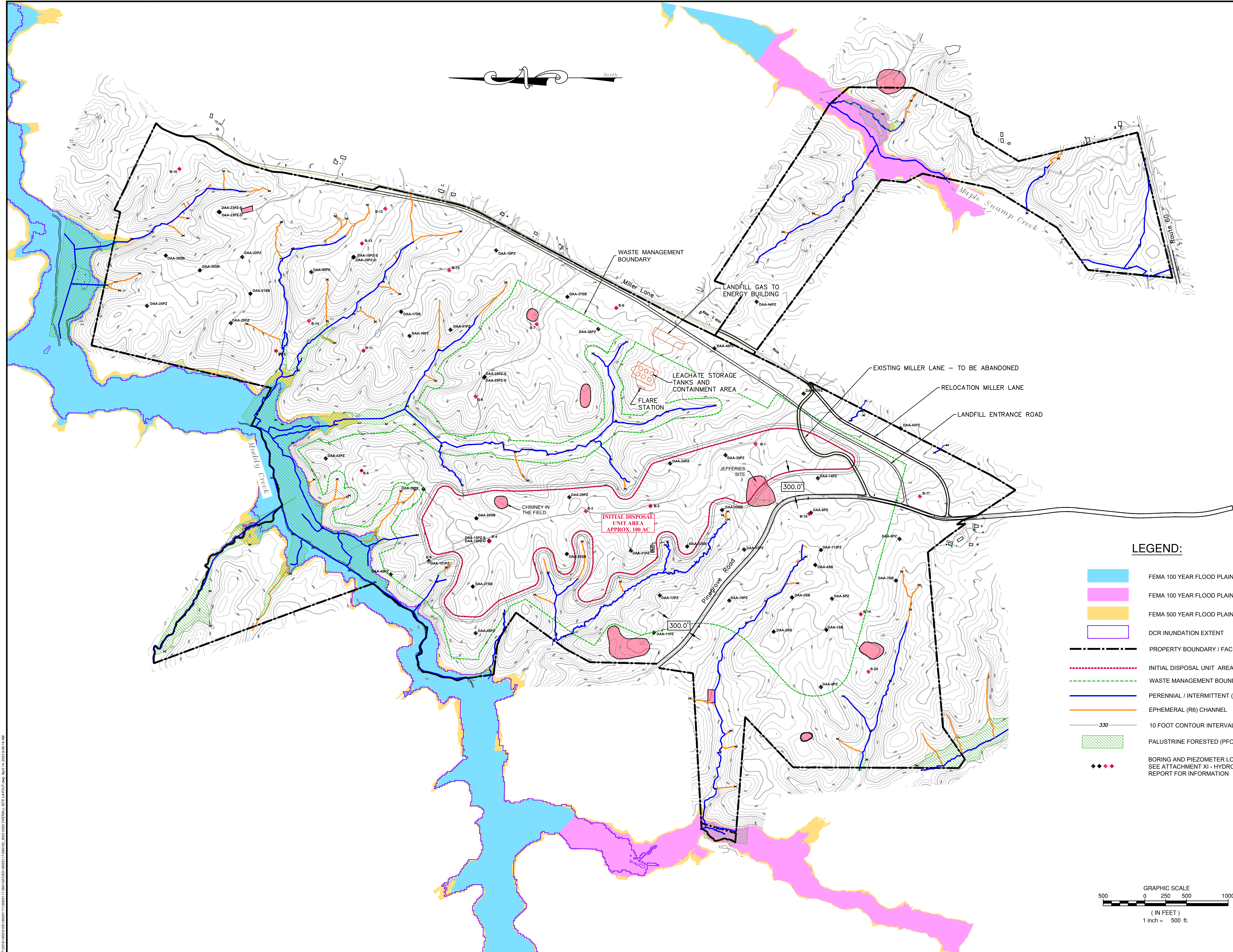
Dean E. Starook
Groundwater Remediation Specialist

cc: Michael D. Lawless, P.G., C.P.G., TRC Companies, Inc.
JengHwa Lyang, DEQ-VRO
Shawn Weimer, DEQ-PRO

ATTACHMENT 02

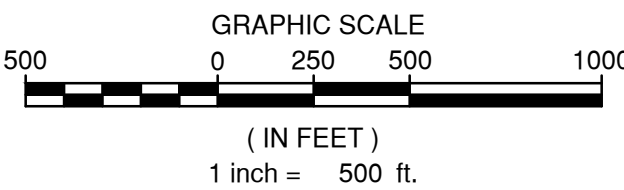
Figure 1 – Overall Site Layout

Prepared by TRC, dated May 12 2023



LEGEND:

- FEMA 100 YEAR FLOOD PLAIN AE (DRAFT)
- FEMA 100 YEAR FLOOD PLAIN A (DRAFT)
- FEMA 500 YEAR FLOOD PLAIN (DRAFT)
- DCR INUNDATION EXTENT
- PROPERTY BOUNDARY / FACILITY BOUNDARY
- INITIAL DISPOSAL UNIT AREA (APPROXIMATE)
- WASTE MANAGEMENT BOUNDARY
- PERENNIAL / INTERMITTENT (R3/R4) CHANNEL
- EPHEMERAL (R6) CHANNEL
- 10 FOOT CONTOUR INTERVAL
- PALUSTRINE FORESTED (PFO) WETLANDS
- BORING AND PIEZOMETER LOCATIONS. SEE ATTACHMENT XI - HYDRO GEOTECH REPORT FOR INFORMATION



REVISIONS	
DESIGNED BY:	WK/LPK
DRAWN BY:	DLD
CHECKED BY:	LPK
SCALE:	1" = 500'
DATE:	05/12/2023
PROJECT NUMBER:	18020117-090102
FIGURE 1	