



REGION 3

PHILADELPHIA, PA 19103

Report Title: Clean Air Act Inspection of Bristol Landfill
Inspection Date(s): 08/22/2024
Regulatory Program(s): Title V, NESHAP, MACT

Company Name: Bristol Integrated Solid Waste Management Landfill
Facility Name: Bristol Integrated Solid Waste Management Landfill
Facility Location: 2125 Shakesville Road
Bristol, VA 24201

Latitude: 36.60128 **Longitude:** -82.15246118
County/Parish: Washington County

AFS/ICIS-Air Number: VA0000005152000160
Permit Number: SWRO11184
NAICS Code: 562212 **SIC:** 4953
DSB ID #: ECAD-5647

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EPA Inspectors*:

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*Additional inspectors identified in report body and on attached sign in sheet

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*Additional inspectors identified in report body and on attached sign in sheet

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I. Introduction

The United States Environmental Protection Agency (EPA) conducted a Geospatial Measurement of Air Pollution (GMAP) inspection at Bristol Integrated Solid Waste Management Landfill (Bristol Landfill or Facility) to determine if elevated levels of specific compounds were present. The Virginia Department of Environmental Quality (VADEQ) was notified of the inspection on July 26, 2024, via email. On August 21, 2024, EPA notified the Facility of the planned inspection via phone.

A. Summary of the Facility

The Bristol Landfill is located at 2125 Shakesville Road, Bristol, VA 24201. The Bristol Landfill is a closed municipality-owned solid waste landfill.

The Facility received a Title V Permit No. SWRO11184, (Registration number 11184) on March 13, 2021, by the Virginia Department of Environmental Quality (VADEQ).

The Bristol Landfill is classified as a minor source for all criteria pollutants, and an area source of Hazardous Air Pollutants (HAPs). The Facility is subject, or is potentially subject, to the following federal regulations:

- 40 CFR Part 60, Subpart A: General Provisions
- 40 CFR Part 60: Subpart Cf - Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills
- 40 CFR Part 60: Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills that Commenced Construction, Reconstruction, or Modification on or After May 30, 1991, but Before July 18, 2014
- 40 CFR Part 60: Subpart XXX - Standards of Performance for Municipal Solid Waste Landfills That Commenced Construction, Reconstruction, or Modification after July 11, 2014
- 40 CFR Part 63: Subpart AAAA - National Emission Standards for Hazardous Air Pollutants: Municipal Solid Waste Landfills

B. Inspection Opening Conference

At 10:00 AM on August 22, 2024, EPA inspectors arrived at the Facility for a CAA Inspection and conducted a brief opening conference. Bristol Landfill was represented by Laura Socia, Solid Waste Director; John Hayes, Operations Manager; and Mike Martin, Solid Waste Administrator. Also, Tracey Blalock, DEQ Enforcement and Air Compliance/Monitoring Manager; Jeff Hurst, DEQ Regional Director; and Stacy Bowers, DEQ Land Protection and Remediation Manager, were present. EPA inspectors, Alex Everhart, Parmatma Adhikari, Steve Ott, Dominique Iaccarino, and Conor Goulding presented their credentials and explained the purpose of the visit was to conduct mobile monitoring using Geospatial Measurement of Air Pollution monitoring (GMAP). Conor Goulding explained that the GMAP vehicle has the capability to monitor volatile organic compounds (VOC), Methane, Hydrogen Sulfide, Sulfur Dioxide, and BTEX (Benzene, Toluene, Ethyl Benzene and Xylene). Additionally, EPA informed the Facility representatives of their right to claim any material obtained during the inspection as

confidential business information (CBI). At that time, Bristol Landfill did not claim any photos or documentation as CBI.

II. Site Activity/Process Description

The City of Bristol began operations at the landfill in 1998. The Facility operates Monday through Friday 7:00 AM to 4:00 PM and has approximately 18 Full time employees. The Bristol Landfill property encompasses approximately 160 acres and has three permitted landfills. Permit 221 Landfill is approximately 12 acres and closed in 1986; Permit 498 Landfill is approximately 14 acres and received final closure May 15, 2024; Permit 588 Landfill is approximately 18 acres and stopped receiving waste on September 9, 2022. An active gas collection is installed and operating on all three permitted areas. Site wide there are approximately 81 gas extraction wells. The gas system flows on average 1,000 to 1,200 standard cubic feet per minute (SCFM) of landfill gas composed of 21% methane (CH₄), 9% oxygen, and 22% carbon dioxide. Historically, Bristol Landfill partnered with Ingenco to combust the landfill gas in turbines to produce electricity; however, as of May 1, 2024, the Ingenco facility ceased operations and no longer partners with the Bristol Landfill, and all of the landfill gas is now combusted in an on-site flare that is rated for 2,500 SCFM. Numerous gas extraction wells have been equipped with dewatering pumps to remove liquid from the 588 Landfill. On average, approximately 220,000 gallons of liquids are removed daily and discharged to the Bristol Virginia Utility Authority Wastewater Treatment Plant. On March 17, 2023, the City of Bristol and DEQ entered into a consent decree to address numerous issues at the Bristol Landfill. The consent decree required the installation of a sidewall odor mitigation system.

The opening conference concluded at 10:30 AM.

III. Observations

EPA inspectors and DEQ attendees were led on a drive through the Facility at 10:45 AM by John Hayes, Laura Socia, and Mike Martin of Bristol Landfill. At 10:45 AM, EPA initiated GMAP monitoring. Alex Everhart, Parmatma Adhikari, Steve Ott, Connor Goulding and Dominique Iaccarino, of EPA, were present during GMAP monitoring. EPA inspectors noted photos and videos may be taken during the Facility walkthrough.

The EPA GMAP vehicle was lead around the Property boundary, along interior roads, and along the cap of the 588 Permit landfill. EPA inspectors observed the landfill gas system flare in operation at the time of the inspection. The flare was observed with an optical gas imaging (OGI) forward looking infrared (FLIR) camera. No un-combusted hydrocarbons were observed when viewing the flare. No elevated levels were detected by the GMAP van during the Facility tour.

The Facility Monitoring concluded at 12:10 PM.

IV. Records Review

No records were reviewed as part of the inspection.

V. Closing Conference

Laura Socia, John Hayes, and Mike Martin of Bristol Landfill and the EPA and VADEQ inspection team had a brief closing conference to ask additional questions and discuss observations. The EPA inspectors noted any areas of concern identified in the final report do not necessarily reflect a violation or deviation, rather, they are areas that may require further investigation. EPA also noted that they would issue an inspection report within 60 days, with a copy to the State. The inspection concluded at 12:20 PM.

No potential issues were identified during the inspection.

DSB ID #: ECAD-5639

VI. List of Attachments

Attachment 1: Inspection Sign-In Sheet

Inspection Sign-In Sheet

Facility: Bristol

Date: 8/22/24

Name	Affiliation	Title	Phone Number	Email
Alex Everhart	EPA	Inspector	215-814-2114	Everhart.Alex@EPA.gov
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