



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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November 9, 2023

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 Permit Application – Conditional Approval**

Dear Mr. Cifor:

The Virginia Department of Environmental Quality (DEQ) Piedmont Regional Office (PRO) has received a Notice of Intent (NOI) and Part A permit application for the Green Ridge Recycling and Disposal Facility, LLC, dated January 17, 2020 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. The application was subsequently reviewed for technical adequacy and regulatory compliance and found to be **technically inadequate** in the Department's second technical review, dated June 16, 2022, and in the Department's addendum to the second technical review, dated October 25, 2022.

The facility submitted a draft response to the Department's second technical review, and based upon the Department's review comments, submitted a revised and updated full NOI and Part A permit application, dated August 3, 2023, and prepared by TRC Companies, LLC (formerly Draper Aden Associates), which incorporates responses to all of the Department's review comments. The revised NOI and Part A permit application propose a facility boundary, waste management boundary, and initial disposal unit boundary for the Green Ridge Recycling & Disposal Facility.

In accordance with § 9VAC20-81-450.A, B, and C, § 9VAC20-81-460, and § 9VAC20-81-120 of the Virginia Solid Waste Management Regulations (VSWMR, 9 VAC 20-81-10 *et seq.*), the NOI and Part A application have been reviewed for **administrative completeness, technical adequacy and regulatory compliance**.

Pursuant to § 9 VAC 20-81-450.C.3 of the VSWMR, DEQ is providing conditional approval of the Part A application. The following information is needed to complete the site suitability determination for the proposed waste management boundary as required by 9VAC20-81-450.C.:

- A. Prior to any development of disposal areas or leachate collection and storage systems beyond the defined initial disposal unit boundary **and** within the proposed Waste Management Boundary, the facility must demonstrate the layout and locations are in compliance with the site suitability provisions of 9 VAC 20-81-120.C.1.b. (perennial streams), 9 VAC 20-81-120.E. (wetlands), and 9 VAC 20-81-120.F.1.c. (springs, seeps, groundwater intrusion). This may require the facility to submit a new JPA, and obtain any necessary wetland permits.
- B. Prior to development of disposal areas or leachate collection and storage systems beyond the initial disposal area, the facility shall coordinate with the Virginia Department of Historic Resources regarding any proposed impacts to the two sites identified as 44CM0145 and 44CM0139, and perform a Phase II investigation and mitigation, as necessary.

While this letter provides a conditional Part A approval, the applicant may submit the Part B application provided the following parameters are adhered to in the submission:

1. The facility boundary (1,177.63 acres), waste management boundary (approximately 428.0 acres), and the initial disposal unit boundary (approximately 104 acres) are limited to those areas identified as the **"Property Boundary / Facility Boundary," "Waste Management Boundary," and "Initial Disposal Unit Area,"** respectively, on the maps entitled "Near Vicinity Map," Part A Attachment IX, Figures 2A, 2B, 2C, and 2D, stamped, signed and dated August 3, 2023.
2. An approved copy of this NOI and Part A permit application for the Green Ridge Recycling and Disposal Facility, Permit No. 626, must be maintained at the site office. This Part A conditional approval letter and attached Near Vicinity Maps dated August 3, 2023, shall be included with the Part B permit application as Attachment 1 to the Design Report. The Part

B permit application must discuss how the parameters described in this Part A conditional approval letter have been met.

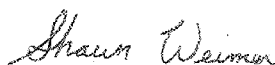
3. During the Part B design, the disposal cells layout and location must be within the waste management boundary that has been delineated as "*Initial Disposal Unit Area*" in the Near Vicinity Map (Figures 2A, 2B, 2C, and 2D) of the Part A application. The total disposal capacity of the facility considering the maximum build-out, must be equal to or less than 54,000,000 cubic yards.
4. The daily maximum disposal limit is 1,500 tons per day. This figure is subject to change (decreasing tonnage only) during the Part B permit application process depending on the planning and permitting for the equipment and other design or operational needs of the facility. Future increases in the daily disposal limit will be handled as a Part B major permit modification and will require submission of a new VDOT approval and adequacy report. Revision of the daily disposal limit may potentially require a revision to the local solid waste management plan (SWMP).
5. The recommendations in the VDOT approval letter dated June 7, 2023, shall be followed in the Part B design of the landfill. This includes installation of a westbound right turn taper on Route 60 at the intersection of Route 654 and widening Route 654 to twenty-two feet (22') between the site entrance and Route 60. Any proposed changes to the entrance of the landfill or other design changes that impact Virginia primary and/or secondary highways will require separate VDOT review and approval.
6. Disposal units that are within 500 feet from the nearest edge of the right-of-way of any highway or street shall be screened by natural objects, plantings, fences, or other means so as to minimize the visibility from the main traveled way of the highway or street.
7. The maximum height/elevation of the landfill final cover system shall not exceed 690 ft above mean sea level (AMSL). The lowest elevation of the base grade is 287.47 ft AMSL.
8. All containment structures, including liners, leachate collection systems, and surface water control systems, shall be designed to resist the maximum horizontal ground acceleration, with a 10% or greater probability of occurring in 250 years, for this site. The value was estimated to be 0.223g in the seismic analysis submitted with the Part A application. The Part B design analysis must be performed using the maximum horizontal acceleration of 0.223g or greater.
9. Prior to construction, any piezometers or monitoring wells located within proposed disposal areas shall be completely removed or over-drilled, followed by grouting to the ground surface.
10. The final NOI and Part A permit application indicate that no wetlands or perennial streams will be impacted by development of the initial disposal unit area. The applicant received concurrence from the ACOE on June 13, 2023, for the supplemental Preliminary Jurisdictional Determination (PJD) of wetlands at the site. The applicant has withdrawn the

Joint Permit Application (JPA) submitted to the USACOE and the DEQ-VWP, by letter dated July 12, 2023.

11. The applicant has completed a Phase I historic resources investigation for the entire site. Based upon the findings of the Phase I investigation, the applicant completed a Phase II investigation of the two sites within the initial disposal area (sites 44CM0138 and 44CM0136). Except as described in condition B above, historic sites within the facility property boundary that are located beyond the initial disposal area shall be marked, protected, and left undisturbed during the development of the facility.

Please contact Mr. Dean E. Starook at (804) 712-9102 or by e-mail at dean.starook@deq.virginia.gov if there are any questions regarding the Part A Notice of Intent and permit application review and approval.

Sincerely,



Shawn Weimer
Regional Land Protection Manager

Attachment: Near Vicinity Map, Figures 2A, 2B, 2C, 2D, dated August 3, 2023

c: Derek Stamey, Cumberland County Administrator
Michael D. Lawless, P.G., C.P.G., TRC Companies, Inc.
Geoff Christe, DEQ-PRO
JengHwa Lyang, DEQ-VRO
Dean Starook, DEQ-PRO