



Love Central Virginia, Inc
P.O Box 238
Cumberland, VA 23040

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Mr. Mike Rolband, Director
Virginia Department of Environmental Quality
Post Office Box 1105
Richmond, Virginia 23218

VIA ELECTRONIC MAIL ONLY

Michael Rolband, Department of Environmental Quality Director
Melanie Davenport, Regulatory Affairs and Outreach Director

cc: Kathryn Perszyk, Land Protection and Revitalization Division Director
Bryan Jones, Virginia Water Protection Program Manager
Dean Starook, Groundwater Remediation Specialist
Shawn Weimer, Land Protection Manager
Virginia Department of Environmental Quality

Michael.Rolband@DEQ.Virginia.gov
Melanie.Davenport@DEQ.Virginia.gov

cc: Kathryn.Perszyk@DEQ.Virginia.gov
Bryan.Jones@DEQ.Virginia.gov
Shawn.Weimer@DEQ.Virginia.gov
Dean.Starook@deq.virginia.gov

Dear Mr. Rolband:

Cumberland County Landfill Alert (CCLA) maintains that the site chosen for the Green Ridge landfill project is not suitable. Recent changes to the application do not change this, in fact, they highlight the persistent nature of the problems with the project. We respectfully submit our concerns with the amended project below:

No site suitability determination; no need for the facility

The Virginia Waste Management Law requires that during Part A review, the DEQ must explicitly determine that the site is suitable and that there is an actual need for the facility. We are concerned that the Part A approval has been given *without* a site suitability determination and without considering the actual need for the facility. There is copious information from both state and local sources (Solid Waste report, SWMP, and Comprehensive Plan) which all indicate that there is no need for additional capacity. Further, the last phase of review, of the “draft changes” proceeded without any transparency to the public. Numerous updates were requested and were not granted.

Project information submitted to state and local authorities is outdated and inconsistent

Over the last five (5)+ years, so many changes have been submitted to DEQ (over four pages on the devoted DEQ website for this project); yet the last update to the Host Agreement was signed by Green Ridge and the Cumberland County Board of Supervisors was in July 2019. The information in the original documents and carried forward in the revised Green Ridge documents is outdated and requires revision to make this a project using current, documented information. The VDOT traffic study submitted with the application is outdated and does not match the latest proposed traffic paths and road alterations. Locally, no public meetings have been held to describe all the proposed changes to the project. The public website for the project has different parameters and operating hours from the permit application. Changes to the road and transportation plans must be reviewed by local entities, particularly the proposed use of Pinegrove Road as an entrance to the facility. Growth has proceeded in the county, with many more houses being built near the proposed facility. County tax revenue has increased substantially without any inflow from the proposed landfill. The Host Agreement is outdated and this cannot be ignored by the permitting process. A consistent proposal, available to all parties, is critically needed.

Concerns raised by ACOE and EPA are not made obsolete by changes

DEQ, the Army Corps of Engineers, and the EPA has cited many reasons the proposed landfill is not suitable. CCLA holds these concerns are valid regardless of the JWP application being withdrawn.

Green Ridge makes superficial changes to satisfy the regulations, while leaving the real project unchanged

The use of the term “initial” as in “the initial phase” and “the initial boundary” is very prevalent in the recent changes but is not included in previous versions. We agree with the statement of December 4, 2023, by Cale Jafee on behalf of AMMD that the use of the term “Initial Disposal Boundary” does not preclude the evaluation of the impacts of the entire site on wetlands and cultural resources. Shrinking the “initial disposal boundary” to the minimum size necessary to avoid running afoul of regulations indicates that permit approval is the goal of Green Ridge, not a project with a clear purpose and need that can be presented honestly to DEQ and to citizens. Additionally, it is obvious that the term “Initial” indicates that there are future plans for expansion that are missing from the application. Therefore the application is not complete or accurate.

CCLA continues to be concerned that there is no need for this project. All solid waste management reports and authorities agree that both the Commonwealth and Central Virginia have adequate landfill capacity (more than 20 years). Similar to the project's shifting disposal boundary within an unchanging waste management boundary, the project's named service area has shifted throughout. It began with the Eastern Seaboard, then disallowed NY/NJ, then proposed to include just Virginia, shrinking down to Central and Southwest Virginia, all while the daily tonnage remains the same (3500-5000) and the Host Agreement with the county still outlines a service area of 500 miles. In our view, just like with the facility boundary, Green Ridge is superficially altering their service plans in the application while the true project plans are unchanged.

Virginia Department of Environmental Quality(DEQ) states on their website:

“Virginia’s abundant natural resources provide a rich environment for people, plants and wildlife... and benefit agriculture, industry, commerce and economic development. To ensure the continued vitality of these precious and valuable resources, DEQ carries out its mission to protect and improve the environment for the health, well-being and quality of life of all Virginians.”

We believe that DEQ’s mission here stated compels consideration of the above concerns with Green Ridge and affiliates’ proposed project in Cumberland.

Sincerely,

Betty Myers

Betty Myers
Chairperson, CCLA