



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY NORTHERN REGIONAL OFFICE

13901 Crown Court, Woodbridge, Virginia 22193
(703) 583-3800

www.deq.virginia.gov

Matthew J. Strickler
Secretary of Natural Resources

David K. Paylor
Director

Thomas A. Faha
Regional Director

February 10, 2020

David Howard
Waste Management
10001 Furnace Road
Lorton, Virginia 22079

VIA EMAIL: dhowar15@wm.com

NO DEFICIENCY LETTER

**Re: Lorton CDD Landfill - 10001 Furnace Road, Lorton
Solid Waste Permit (SWP) 331**

Dear Mr. Howard:

On January 30, 2020, the Virginia Department of Environmental Quality Northern Regional Office staff conducted a compliance inspection of the solid waste management facility operating under SWP 331. During this inspection, the facility was evaluated for compliance with the Virginia Waste Management Act, Va. Code § 10.1-1400 *et seq.* ("Act"), the Virginia Solid Waste Management Regulations, 9 VAC 20-81-10 *et seq.* ("Regulations"), and SWP 331.

During the inspection, no apparent violations of the Act, Regulations, or SWP 331 were observed. A copy of the inspection checklist is enclosed.

If you have any questions, please contact me at (703) 583-3832 or Jeffrey.modliszewski@deq.virginia.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeffrey Modliszewski".

Jeffrey Modliszewski
NRO Solid Waste Compliance Inspector

cc: ECM SWP 331
Brandy Mueller, Fairfax County



Compliance Inspection Report

Inspection Summary

Facility: Lorton Construction Landfill

Inspector: Jeffrey Modliszewski

Permit: SWP331

Inspection Date: 1/30/2020

Region: Northern

Approximate Arrival Time: 9:00 a.m.

Inspection Type: Compliance Evaluation Inspection

Inspection Method: Announced

Facility Staff: John Dottellis

Exit Interview: Yes

Weather Conditions: Sunny 30° Fahrenheit

Comments: Joe Precise, NRO DEQ Solid Waste Permit Writer also attended the inspection.

Construction / Demolition / Debris (CDD) Landfill (Inactive)

Reference	Description	SL	Result
Compliance Area: Operator Information			
10.1-1408.1	Disclosure Statement	I	✓
10.1-1408.2	Operator Certification	II	✓
Compliance Area: Recordkeeping, Reporting & Permit			
20-81-80	Waste Assessment Program	II	✓
20-81-100.B	Compliance with the facility's permit	II	✓
20-81-100.E	Unauthorized waste program and inspection	II	✓
20-81-140.A.16	Facility self inspections	I	✓
20-81-140.A.17	Record maintained of waste received and processed	I	N/A
20-81-485	Operations Manual	II	✓
20-81-530	Permittee recordkeeping and reporting	II	✓
Compliance Area: Design, Construction & Operation			
20-81-110.B	Prohibited waste	II	N/A
20-81-130	Facility design / construction	I	✓
20-81-140.A.1,4	Safety and fire control	II	✓
20-81-140.A.6	Pollutant discharge	III	✓
20-81-140.A.7	Stormwater control system maintenance	II	✓
20-81-140.A.8,14-15	Facility operation, maintenance, and training	II	✓
20-81-140.A.9-13	Hazard and nuisance control	I	✓
20-81-140.C	Compaction and cover	I	✓
20-81-610-660	Special Waste	II	N/A
Compliance Area: Closure & Post-Closure Care			
20-81-160	Closure requirements	II	✓
20-81-170	Post-closure care requirements	II	
Compliance Area: Decomposition Gas Control			
20-81-200	Decomposition gas control	II	✓
Compliance Area: Leachate Control			
20-81-210	Leachate control	II	✓
Compliance Area: Groundwater Monitoring			
20-81-250	Groundwater monitoring program	II	✓
20-81-260	Corrective action program	II	N/A
Compliance Area: Landfill Mining			
20-81-385 & 395	Landfill Mining	II	N/A

SL = Severity Level

✓ = In Compliance

X = Alleged Violation

N/A = Not Applicable

Blank = Not Inspected

General Comments

Reference	Comments
10.1-1408.1	Disclosure Statement - The Disclosure Statement was reviewed; no compliance issues were noted.
20-81-80	Waste Assessment Program - The 2019 Solid Waste Information and Assessment Program (SWIA) Form DEQ 50-25 is due March 31, 2020, instructions and the link where the form can be submitted online can be found at http://www.deq.virginia.gov/Programs/LandProtectionRevitalization/SolidHazardousWasteRegulatoryPrograms/SolidWaste/SolidWasteInformationandAssessmentProgram.aspx . Please contact Joe Precise at 703-583-3941 or by email joseph.precise@deq.virginia.gov if you need additional assistance in completing the form.
20-81-100.B	Compliance with the facility's permit - Please ensure that the closure construction activities are coordinated with Yurek Aurelson, Solid Waste Permit Writer.
20-81-100.E	Unauthorized waste program and inspection - The facility ceased accepting construction demolition and debris on August 3, 2018.
20-81-140.A.16	Facility self inspections - The facility conducted monthly self-inspections between August 2019 and January 2020.
20-81-485	Operations Manual - David Howard recertified the operations manual on May 1, 2019.
20-81-530	Permittee recordkeeping and reporting - The facility provided the 24-hour notifications and the five day written submissions for the gas exceedances in the gas boundary wells and when the gas remediation's blower was found to be deactivated on November 8, 2019. The blower was replaced and restarted on November 11, 2019.
20-81-140.A.6	Pollutant discharge - The landfill was inspected; no leachate seeps were observed.
20-81-140.C	Compaction and cover - An erosion gully was observed where the stormwater conveyance channel failed on the eastern slope of the landfill near Sedimentation Basin 8. The facility was planning on replacing the whole stormwater system conveyance channel in the next month.
20-81-160	Closure requirements - On January 3, 2020, the facility submitted a partial closure report for 24.6 acres.
20-81-200	Decomposition gas control - On June 20, 2019, the facility was issued a Warning Letter for a compliance level exceedance in gas boundary wells on the western boundary of the property. The facility last exceeded the compliance level for methane in boundary well GP-21 on November 20, 2019. The gas flare and blower were inspected; no compliance issues were noted.
20-81-210	Leachate control - The above ground storage tanks (ASTs) where leachate is stored were inspected; no compliance issues were noted. The facility should update its Leachate Management Plan to reflect that it now hauls leachate to a Waste Management facility in Sussex County, Virginia.
20-81-250	Groundwater monitoring program - Nine groundwater monitoring wells were inspected; ensure that the groundwater wells are locked, labeled, and that their concrete pads are free of debris and in good working condition.

Disclosure Statement Details

Key Personnel	Title
Dan Bergan	Environmental Protection Manager
David Howard Jr.	Senior District Manager
John Dottellis	Area Engineering Manager

Disclosure Statement Last Updated: 9/24/2018

Waste Management Facility Operators

Licensed Operator	License #	Expiration Date
David Howard	4605002135	4/30/2021
William Williams	4605003459	3/31/2020

PLEASE advise the Regional Office within 10 calendar days if any information noted in this report is incorrect, if you have taken appropriate action to meet compliance, or if there is other information that the department should consider regarding any alleged violations.

PLEASE be advised that this report is not an agency proceeding or determination which may be considered a case decision under the Administrative Process Act (VA Code 2.2-4000 et seq). If informal discussions do not lead to a satisfactory conclusion on the contents of this report, you may request in writing that DEQ take all necessary steps to issue a final decision or fact finding under the APA on whether or not a violation has occurred.