



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE

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April 13, 2022

David Kaasa
Waste Management
10376 Bullocks Drive
King George, Virginia 22485

VIA EMAIL: dkaasa@wm.com

NO DEFICIENCY LETTER

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

Dear Mr. Kaasa:

On March 9, 2022, 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 (571) 866-6454 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 Permit: SWP331 Region: Northern Inspection Type: Compliance Evaluation Inspection Facility Staff: John Dottellis, Area Engineering Manager and David Kaasa, District Manager Comments: Rehan Ali and Mario Avelar from Fairfax County were onsite to perform inspections for Fairfax County.	Inspector: Jeffrey Modliszewski Inspection Date: 3/9/2022 Approximate Arrival Time: 9:30 a.m. Inspection Method: Announced Exit Interview: Yes Weather Conditions: Rain 41° Fahrenheit
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Construction / Demolition / Debris (CDD) Landfill (Post-Closure)

Reference	Description	SL	Result
Compliance Area: Operator Information			
10.1-1408.1	Disclosure Statement	I	✓
Compliance Area: Recordkeeping, Reporting & Permit			
20-81-100.B	Compliance with the facility's permit	II	✓
20-81-530	Permittee recordkeeping and reporting	II	✓
Compliance Area: Design, Construction & Operation			
20-81-140.A.6	Pollutant discharge	III	✓
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.
20-81-100.B	Compliance with the facility's permit - The facility began its Post Closure Care period on April 1, 2021.
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 blower outages.
20-81-140.A.6	Pollutant discharge - A groundwater discharge which contained iron oxidizing bacterial was observed in the woods east of the landfill near Sediment Basin 6. The facility had sampled the discharge in February 2021. To determine if the seep is contaminated with leachate resample the groundwater seep and sample the seep for the constituents that are listed in the Indicator Tests to Characterize Leachate these constituents can be found here: https://townhall.virginia.gov/L/GetFile.cfm?File=C:\TownHall\docroot\GuidanceDocs\440\GDoc_DEQ_6882_v2.pdf .
20-81-160	Closure requirements - The facility's entrance was gated to prohibit access to the facility and sign was posted that indicated the facility was closed and no longer accepting waste.

20-81-170	Post-closure care requirements - The facility's monthly post closure care inspections for August 2021 through February 2022 were reviewed; no compliance issues were noted. The facility's cover was inspected, vegetation appeared to be established; however, erosion rills were observed near the bottom of the eastern slope, it had rained the previous evening and was raining during the inspection. The facility was planning on repairing the rills in the week after the inspection.
20-81-200	<p>Decomposition gas control - Decomposition gas control - In June 2019, the facility was issued a Warning Letter for a compliance level exceedance in gas boundary wells on the western boundary of the property on June 5, 2019. The facility last exceeded the compliance level for methane in boundary well GP-17 located on the eastern boundary of the facility on January 6, 2022 and is currently monitoring methane monthly. The facility last performed quarterly methane monitoring on March 3, 2022, no methane exceedances were detected.</p> <p>Since the previous inspection in August 2021 facility connect a blower to the vents located near GP-18. The blower system had an electrical failure during the week of January 3rd. The facility decided to leave the temporary blower system off to determine the source of the methane in GP-17.</p> <p>The gas flares were inspected: no compliance issues were noted.</p>
20-81-210	Leachate control - The facility disposes of leachate at the Waste Management treatment facility in Sussex County. The leachate disposal records were reviewed; no compliance issues were noted. The above ground storage tanks (ASTs) where the leachate is stored were inspected; no compliance issues were noted.
20-81-250	Groundwater monitoring program - Groundwater monitoring wells: MW-5 and MW-4R were inspected. The wells were locked, labeled, and landscaped.

Disclosure Statement Details

Key Personnel	Title
David Kaasa	District Manager
David Moreira	Area Director
EnviroSolutions Holdings Inc	
Envirosolutions Real Property Holdings Inc	
Furnace Associates Inc	
Michael J. Magee	Director of Finance for Market Area
Ronald S. Ward	President
Waste Management Holdings Inc	

Disclosure Statement Last Updated: 6/30/2021

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.