



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

NORTHERN REGIONAL OFFICE
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Regional Director

September 1, 2022

David Kaasa
Waste Management
10376 Bullocks Drive
King George, Virginia 22485
dkaasa@wm.com

Sent Via Electronic Mail

NO DEFICIENCY LETTER

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

Dear Mr. Kaasa:

On August 25, 2022, the Virginia Department of Environmental Quality Northern Regional Office staff conducted a compliance inspection of the solid waste management facility operating under SWP331. 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 SWP331.

During the inspection, no apparent violations of the Act, Regulations, or SWP331 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: David Kaasa, District Manager
Inspector: Jeffrey Modliszewski
Inspection Date: 8/25/2022
Approximate Arrival Time: 10:45 a.m.
Inspection Method: Announced
Exit Interview: Yes
Weather Conditions: 84° Fahrenheit
Comments: Daylan Ware, NRO Solid Waste Permit Writer/Groundwater Reviewer also attended the inspection.

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.
20-81-140.A.6	Pollutant discharge - The groundwater discharge which was observed in February 2022 was still ongoing. The discharge contained iron oxidizing bacterial and was observed in the woods east of the landfill near Sediment Basin 6. The facility had sampled the discharge since the February 2021 inspection and was in the process of preparing a report.
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 quarterly post closure care inspections were reviewed; no compliance issues were noted. The facility's cover was inspected, vegetation appeared to be established.

20-81-200	<p>Decomposition gas control - In June 2019, the facility was issued a Warning Letter for a compliance level exceedance in the gas boundary wells on the western boundary of the property on June 5, 2019. The facility did not detect methane in the boundary wells between January 11 and April 13, 2022. On April 13, 2022 the facility detected methane above the compliance level in GP-17, GP-18, and GP-19. GP-17, GP-18 and GP-19 are located on the eastern boundary. The facility reconnected the blower to the vents located adjacent to GP-17, GP-18, and GP-19 on April 13th. The blower system was placed in air curtain mode and returned to vacuum mode May 16th. The facility is currently planning on installing a series of passive vents between the blower and the landfill. The work is tentatively scheduled for September and October 2022.</p> <p>The facility last exceeded the compliance level for methane in GP-17 and GP-18 during the weekly monitoring that was performed on August 22, 2022.</p>
20-81-210	<p>Leachate control - The facility disposes of leachate at the Waste Management treatment facility in Sussex County. The leachate disposal records for March through August 2022 reviewed; no compliance issues were noted. The above ground storage tanks (ASTs) where the leachate is stored were inspected; no compliance issues were noted.</p>
20-81-250	<p>Groundwater monitoring program - Groundwater monitoring wells: MW-2, MW-2A, MW-3, MW-4A, MW-4R, MW-5, and MW-6 were inspected. The wells were locked, labeled, and landscaped.</p>

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.