



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY NORTHERN REGIONAL OFFICE

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

[www.deq.virginia.gov](http://www.deq.virginia.gov)

Matthew J. Strickler  
Secretary of Natural Resources

David K. Paylor  
Director

Thomas A. Faha  
Regional Director

August 27, 2019

David Howard  
Waste Management  
10001 Furnace Road  
Lorton, Virginia 22079

VIA EMAIL: [dhowar15@wm.com](mailto:dhowar15@wm.com)

### **NO DEFICIENCY LETTER**

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

Dear Mr. Howard:

On August 13, 2019, 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](mailto: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:** 8/13/2019

**Region:** Northern

**Approximate Arrival Time:** 9:30 a.m.

**Inspection Type:** Compliance Evaluation Inspection

**Inspection Method:** Announced

**Facility Staff:** John Dottellis and Angelique Vera

**Exit Interview:** Yes

**Weather Conditions:** Cloudy, 84° Fahrenheit

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

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

Reference	Description	SL	Result
<b>Compliance Area: Operator Information</b>			
10.1-1408.1	Disclosure Statement	I	✓
10.1-1408.2	Operator Certification	II	✓
<b>Compliance Area: Recordkeeping, Reporting &amp; Permit</b>			
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	✓
<b>Compliance Area: Design, Construction &amp; Operation</b>			
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
<b>Compliance Area: Closure &amp; Post-Closure Care</b>			
20-81-160	Closure requirements	II	
20-81-170	Post-closure care requirements	II	✓
<b>Compliance Area: Decomposition Gas Control</b>			
20-81-200	Decomposition gas control	II	✓
<b>Compliance Area: Leachate Control</b>			
20-81-210	Leachate control	II	✓
<b>Compliance Area: Groundwater Monitoring</b>			
20-81-250	Groundwater monitoring program	II	
20-81-260	Corrective action program	II	N/A
<b>Compliance Area: Landfill Mining</b>			
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 - 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 self-inspections in May, June, and in July 2019.
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.
20-81-140.A.6	Pollutant discharge - The landfill was inspected; no leachate seeps were observed.
20-81-140.A.7	Stormwater control system maintenance - The facility had cleaned Sedimentation Basin 2 and was cleaning Basin 3 and Basin 9.
20-81-140.C	Compaction and cover - The facilities intermediate cover was inspected; no compliance issues were noted.
20-81-170	Post-closure care requirements - The facility was repairing erosion rills on the closed portion of the eastern slope of the landfill.
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-26 on August 7, 2019.  The gas remediation blower that had a bearing failure in June 2019 had been reinstalled after being rebuilt.  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 was no longer discharging leachate to the sanitary sewer and was now hauling it to a Waste Management facility in Sussex County Virginia for treatment. The facility should update its Leachate Management Plan to reflect how it is planning on handling leachate in the future.

## 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.