September 4, 2019

Waste Management of Virginia, Inc.
Attn: Mr. Raymond McGowan
20221 Maplewood Road
Jetersville, VA 23083

Waste Management of Virginia, Inc.
Attn: Mr. Raymond McGowan
8000 Chambers Road
Charles City, VA 23030

Waste Management of Virginia, Inc.
Attn: Mr. Brian McClung
1001 Fannin Street
Houston, TX 77002

NOTICE OF VIOLATION

RE: NOV No. 1904-001041
VWP Individual Permit No. 15-1661
Waste Management Maplewood Landfill, Amelia County, Virginia

NOV No. 1903-00976 & 2019-07-PRO-201
VPDES Permit No. VAR100808
Virginia Water Protection Program Site No. 19-000617
Charles City County Landfill, Charles City County, Virginia

Dear Messrs. McClung and McGowan:

This letter notifies you of information upon which the Department of Environmental Quality (Department or DEQ) may rely in order to institute an administrative or judicial enforcement action. Based on this information, DEQ has reason to believe that Waste
Management of Virginia, Inc. (Waste Management) may be in violation of the Virginia Stormwater Management Act, Regulations, and Virginia Pollutant Discharge Elimination System (VPDES) Permit No. VAR100808 (VPDES Permit) and the State Water Control Law and the Virginia Water Protection (VWP) Permit Program Regulations at the Charles City County Landfill in Charles City County and at the Waste Management Maplewood Landfill in Amelia County.

This letter addresses conditions at the sites named above, and cites compliance requirements of the State Water Control Law and Regulations, §62.1-44.15:20 et seq., Virginia Stormwater Management Act, § 62.1-44.15:24 et seq., Virginia Stormwater Management Regulation, the VWP Permit Program Regulations, VWP Permit, and the VPDES Permit. Pursuant to Va. Code § 62.1-44.15(8a), this letter is not a case decision under the Virginia Administrative Process Act, Va. Code § 2.2-4000 et seq. (APA). DEQ requests that you respond within 10 days of the date of this letter to arrange a prompt meeting.

OBSERVATIONS AND LEGAL REQUIREMENTS

On May 31, 2016, DEQ granted coverage to Waste Management under a VWP Permit for impacts to surface waters associated with construction activities at the Waste Management Maplewood Landfill, assigning it a VWP Individual Permit number 15-1661. On March 18, 2019, DEQ staff conducted a VWP Permit compliance inspection at the Waste Management Maplewood Landfill in Amelia County after DEQ received a report of a sediment discharge at the facility.

On August 1, 2014, DEQ granted coverage to Waste Management under a General VPDES Permit for Discharge of Stormwater Associated with Construction Activities at the Charles City County Landfill, assigning it a registration number VAR100808. On February 6, 2019 and April 29, 2019, DEQ staff conducted inspections of the Charles City Landfill to determine compliance with the VPDES Permit. DEQ staff conducted site inspections at the Charles City County Landfill on February 22, 2019 and March 6, 2019 to assess compliance with the State Water Control Law and the VWP Permit Regulations. DEQ requested additional information on March 14, 2019, which Waste Management provided on April 19, 2019.

The inspection reports are attached. The following describe the staff’s factual observations and identify the applicable legal requirements.

1. Observations: During the March 18, 2019 inspection at the Waste Management Maplewood Landfill, DEQ staff observed approximately 0.42 acres of palustrine emergent wetland, 0.22 acres of palustrine scrub shrub wetland, and 0.14 acres of palustrine forested wetland have been impacted by the accumulation of one to 12 inches of sediment in varying locations throughout the site. In addition, approximately 32 linear feet of intermittent stream channel and 7 linear feet of ephemeral stream channel have been impacted as presented in the figure entitled “Maplewood Landfill Wetland Sediment Release, Corrective Action Plan, Wetland
and Sediment Delineation Map (1 of 2) Drawing 3” dated July 19, 2019. Sediment erosion and deposition into the wetlands and the stream channels appeared to result from the lack of appropriately installed and maintained erosion and sediment controls or other best management practices, leaving state waters at continued risk for secondary impacts.

Legal Requirements: Va. Code §62.1-44.15:20(A) states “A. Except in compliance with an individual or general Virginia Water Protection Permit issued in accordance with this article, it shall be unlawful to: 1. Excavate in a wetland; 2. On or after October 1, 2001, conduct the following in a wetland: a. New activities to cause draining that significantly alters or degrades existing wetland acreage or function; b. Filling or dumping; c. Permanent flooding or impounding; or d. New activities that cause significant alteration or degradation of existing wetland acreage or functions; or 3. Alter the physical, chemical, or biological properties of state waters and make them detrimental to the public health, animal or aquatic life, or to the uses of such waters for domestic or industrial consumption, or for recreation, or for other uses unless authorized by a certificate issued by the Board.”

9VAC 25-210-50 (A) states that “Except in compliance with a VWP permit, no person shall dredge, fill or discharge any pollutant into, or adjacent to surface waters, withdraw surface water, otherwise alter the physical, chemical or biological properties of surface waters and make them detrimental to the public health, or to animal or aquatic life, or to the uses of such waters for domestic or industrial consumption, or for recreation, or for other uses; excavate in wetlands or on or after October 1, 2001, conduct the following activities in a wetland: 1. New activities to cause draining that significantly alters or degrades existing wetland acreage or functions; 2. Filling or dumping; 3. Permanent flooding or impounding; or 4. New activities that cause significant alteration or degradation of existing wetland acreage or functions.”

Part I.D.13 of the VWP Individual Permit states, “Stormwater runoff shall be prohibited from directly discharging into any surface waters. Best management practices (BMP) designed, installed, and maintained, as described in the Virginia Erosion and Sediment Control Handbook (Third Edition, 1992, or the most recent version in effect at the time of construction) and the Virginia Stormwater Management Handbook (First Edition, 1999, or the most recent version in effect at the time of construction), shall be deemed suitable treatment prior to discharge into surface waters. Installation of alternative practices not described in these references shall be submitted to DEQ for approval prior to beginning construction.”

Part I.D.19 of the VWP Individual Permit states, “All temporarily impacted streams and stream banks shall be restored to their original elevations and contours within 30 calendar days following the construction at that stream segment, and the banks shall
be seeded or planted with the same vegetative cover type originally present along the banks, including supplemental erosion control grasses if necessary but not including invasive species identified on DCR’s Invasive Alien Plant Species of Virginia list. The permittee shall take all appropriate measures to promote and maintain the revegetation of temporarily disturbed surface waters through the second year post disturbance.”

Part I.D.24 of the VWP Individual Permit states, “Erosion and sedimentation controls shall be designed in accordance with the Virginia Erosion and Sediment Control Handbook, Third Edition, 1992, or the most recent version in effect at the time of construction. These controls shall be placed prior to clearing and grading activities and shall be maintained in good working order, to minimize impacts to surface waters. These controls shall remain in place only until clearing and grading activities cease and these areas have been stabilized.”

Part I.E.I of the VWP Individual Permit states, “Any exposed slopes or streambanks shall be stabilized immediately upon completion of work in each impact area. Methods and materials for stabilization shall be in accordance with the Virginia Erosion and Sediment Control Handbook, Third Edition, 1992, or the most recent version in effect at the time of construction.”

2. Observations: During the inspections at the Charles City County Landfill, DEQ staff observed approximately 3.01 acres of palustrine forested wetland, 0.06 acre of palustrine scrub shrub wetland, 0.12 acre of palustrine emergent wetland, and 1214 linear feet of stream channel have been impacted by the accumulation of one to 36 inches of sediment in varying locations throughout the site. Sediment erosion and deposition into the wetlands and the unnamed tributary to Bradley Run appeared to result from the lack of appropriately installed and maintained erosion and sediment controls or other best management practices. DEQ has not issued a VWP Permit authorizing these impacts to surface waters.

Legal Requirements: Va. Code §62.1-44.15:20(A) states “A. Except in compliance with an individual or general Virginia Water Protection Permit issued in accordance with this article, it shall be unlawful to: 1. Excavate in a wetland; 2. On or after October 1, 2001, conduct the following in a wetland: a. New activities to cause draining that significantly alters or degrades existing wetland acreage or function; b. Filling or dumping; c. Permanent flooding or impounding; or d. New activities that cause significant alteration or degradation of existing wetland acreage or functions; or 3. Alter the physical, chemical, or biological properties of state waters and make them detrimental to the public health, animal or aquatic life, or to the uses of such waters for domestic or industrial consumption, or for recreation, or for other uses unless authorized by a certificate issued by the Board.”
9VAC 25-210-50 (A) states that “Except in compliance with a VWP permit, no person shall dredge, fill or discharge any pollutant into, or adjacent to surface waters, withdraw surface water, otherwise alter the physical, chemical or biological properties of surface waters and make them detrimental to the public health, or to animal or aquatic life, or to the uses of such waters for domestic or industrial consumption, or for recreation, or for other uses; excavate in wetlands or on or after October 1, 2001, conduct the following activities in a wetland: 1. New activities to cause draining that significantly alters or degrades existing wetland acreage or functions; 2. Filling or dumping; 3. Permanent flooding or impounding; or 4. New activities that cause significant alteration or degradation of existing wetland acreage or functions.”

3. Observations: During the February 6, 2019 inspection at the Charles City County Landfill, staff observed that an approved stormwater management plan was not in the stormwater pollution prevention plan (SWPPP).

Legal Requirements: 9 VAC 25-870-54(C) states: “A stormwater management plan consistent with the requirements of the Virginia Stormwater Management Act and regulations must be designed and implemented during construction activities. Prior to land disturbance, this plan must be approved by the VSMP authority.”

9 VAC 25-870-54(A) states in part: “A stormwater pollution prevention plan shall include, but not be limited to, an approved erosion and sediment control plan, an approved stormwater management plan, a pollution prevention plan for regulated land-disturbing activities…”

4. Observations: During the February 6, 2019 and April 29, 2019 inspections at the Charles City County Landfill, DEQ staff observed that the SWPPP inspections were not conducted and recorded at the minimum required frequency, the inspection reports did not include all items listed in the VPDES permit, and were not signed by the operator or delegated authority. In addition, inspection reports indicated that existing controls are failing to minimize pollutants in stormwater discharges from the site and that modifications to the control measures are necessary.

Legal Requirements: VPDES Permit Part I(B)(4)(d)(1) states in part: “The applicable SWPPP inspection requirements specified in Part II F 2 shall be amended as follows: (1) Inspections shall be conducted at a frequency of (i) at least once every four business days or (ii) at least once every five business days and no later than 48 hours following a measurable storm event. In the event that a measurable storm event occurs when there are more than 48 hours between business days, the inspection shall be conducted on the next business day…”
VPDES Permit Part II(G)(1), states: “The operator shall implement the corrective action(s) identified as a result of an inspection as soon as practicable but no later than seven days after discovery or a longer period as approved by the VSMP authority. If approval of a corrective action by a regulatory authority (e.g., VSMP authority, VESCP authority, or the department) is necessary, additional control measures shall be implemented to minimize pollutants in stormwater discharges until such approvals can be obtained.”

VPDES Permit Part II(F)(3), states in part: “As part of the inspection, the qualified personnel shall: (1) Record the date and time of the inspection….”

VPDES Permit Part II(F)(4) states in part: “The inspection report and any actions taken in accordance with Part II must be retained by the operator as part of the SWPPP for at least three years…”

5. **Observations:** At the time of the Charles City County Landfill inspection on February 6, 2019, the SWPPP did not identify qualified personnel for conducting inspections at this site. During the April 29, 2019 inspection, DEQ staff observed that the SWPPP did not identify a delegated authority for signing inspection reports or modifying the SWPPP, and did not identify a contractor responsible for the implementation and maintenance of the erosion and sediment controls.

**Legal Requirements:** VPDES Permit Part II(A)(6) states: “Stormwater pollution prevention plan contents. The SWPPP shall include the following items… Qualified personnel. The name, phone number, and qualifications of the qualified personnel conducting inspections required by this general permit.”

VPDES Permit Part II(A)(7) state: “Delegation of authority. The individuals or positions with delegated authority, in accordance with Part III K, to sign inspection reports or modify the SWPPP”

VPDES Permit Part III(K)(2) states in part: “Reports, etc. All reports required by this general permit, including SWPPPs, and other information requested by the board or the department shall be signed by a person described in Part III K 1 or by a duly authorized representative of that person…”

VPDES Permit Part II(B)(3) state: “The SWPPP must clearly identify the contractor(s) that will implement and maintain each control measure identified in the SWPPP. The SWPPP shall be amended to identify any new contractor that will implement and maintain a control measure.”
6. **Observations**: During the April 29, 2019 inspection at the Charles City County Landfill, DEQ staff observed that Waste Management did not update or amend the SWPPP to contain a record of dates of major grading activities, dates when construction activities temporarily or permanently ceased, and dates of initiating stabilization measures. The SWPPP also did not have a record of areas that are no longer under the control of the operator or areas the operator no longer had legal control and records of any changes in design, construction operation or maintenance. In addition, Waste Management did not record in the SWPPP sediment discharges identified on previous VPDES inspection reports and VWP inspection reports for the site.

**Legal Requirements**: VPDES Permit Part II(B)(1) states: “The operator shall amend the SWPPP whenever there is a change in the design, construction, operation, or maintenance that has a significant effect on the discharge of pollutants to surface waters and that has not been previously addressed in the SWPPP.”

VPDES Permit Part II(B)(4)(a) states: “The operator shall update the SWPPP no later than seven days following any modification to its implementation. All modifications or updates to the SWPPP shall be noted and shall include the following items:

a. A record of dates when:
(1) Major grading activities occur;
(2) Construction activities temporarily or permanently cease on a portion of the site; and
(3) Stabilization measures are initiated;

b. Documentation of replaced or modified controls where periodic inspections or other information have indicated that the controls have been used inappropriately or incorrectly and where modified as soon as possible;

c. Areas that have reached final stabilization and where no further SWPPP or inspection requirements apply;

d. All properties that are no longer under the legal control of the operator and the dates on which the operator no longer had legal control over each property;

e. The date of any prohibited discharges, the discharge volume released, and what actions were taken to minimize the impact of the release;

f. Measures taken to prevent the reoccurrence of any prohibited discharge; and

g. Measures taken to address any evidence identified as a result of an inspection required under Part II F...”

9 VAC 25-870-54(G) states in part: “The SWPPP shall be amended whenever there is a change in design, construction, operation, or maintenance that has a significant effect on the discharge of pollutants to state waters and that has not been previously addressed in the SWPPP.”
7. **Observations:** During the February 6, 2019 inspection at the Charles City County Landfill, DEQ staff observed that Sediment Basin 2 had unstable slopes and exhibited severe erosion along its banks. In addition, DEQ staff observed sediment deposition downstream of the Sediment Basin 2 outfall. During the inspections on February 6, 2019 and April 29, 2019, DEQ noted that Sediment Basin 2 had eroded side slopes, lacked stabilization, and had accumulated excess sediment within the basin. DEQ staff noticed there were no temporary diversion dikes leading to Sediment Basin 2, as shown on the approved plans. During the April 29, 2019 inspection, Waste Management was regrading Sediment Basin 1 as part of maintenance operations. The outlet structure of Sediment Basin 1 showed signs of a discharge and sediment deposition at the outfall. Sediment Basin 2 did not show signs of any corrective action requested in the February 6, 2019 Inspection Report and showed signs of sediment laden water leaving the basin at the outfall. DEQ staff observed the on-site sediment basins were not functioning as intended nor installed in accordance with the approved plan.

**Legal Requirements:** 9 VAC 25-840-40(4) states: “Sediment basins and traps, perimeter dikes, sediment barriers and other measures intended to trap sediment shall be constructed as a first step in any land-disturbing activity and shall be made functional before upslope land disturbance takes place.”

9 VAC 25-840-40(5) states: “Stabilization measures shall be applied to earthen structures such as dams, dikes and diversions immediately after installation.”

9 VAC 25-840-60(A) states in part: “All erosion and sediment control structures and systems shall be maintained, inspected and repaired as needed to insure continued performance of their intended function…”

VPDES Permit Part II (E) (1) states in part: “All control measures must be properly maintained in effective operating condition in accordance with good engineering practices and, where applicable, manufacturer specifications.”

9 VAC 25-840-40(19) states in part: “Properties and waterways downstream from development sites shall be protected from sediment deposition, erosion and damage…”

8. **Observations:** During the inspections on February 6, 2019 and April 29, 2019 at the Charles City County Landfill, there were denuded areas throughout the site that Waste Management had not stabilized, as required by approved plans. DEQ staff observed areas lacking functional perimeter sediment trapping controls, where upslope land disturbance had occurred, to prevent sediment-laden stormwater from exiting the site as required by the approved erosion and sediment control plan. During the February 6, 2019 Inspection, DEQ staff observed sediment passing through, around, and over the silt fences at multiple areas throughout the Site. Waste Management did not maintain or install silt fences in accordance
with approved plans. During the April 29, 2019 inspection, DEQ staff observed that large areas on-site have been cleared but were not graded to direct flow to the sediment basins, instead these areas flow directly to silt fences or to areas without perimeter controls. DEQ staff also observed that Waste Management had not completed grading work after finishing clearing activities. DEQ staff noted that erosion and sediment control measures and best management practices were not installed or maintained as described in the site’s approved plans.

Legal Requirements: 9 VAC 25-840-40(4) states: “Sediment basins and traps, perimeter dikes, sediment barriers and other measures intended to trap sediment shall be constructed as a first step in any land disturbing activity and shall be made functional before upslope land disturbance takes place.”

9 VAC 25-840-40(6) states in part: “Sediment traps and sediment basins shall be designed and constructed based upon the total drainage area to be served by the trap or basin…”

9 VAC 25-870-54(B) states in part: “An erosion and sediment control plan consistent with the requirements of the Virginia Erosion and Sediment Control Law and regulations must be designed and implemented during construction activities.”

VPDES Permit Part II(A)(2)(c)(8) states: “A properly implemented erosion and sediment control plan… ensures that stabilization of disturbed areas will be initiated immediately whenever any clearing, grading, excavating, or other land-disturbing activities have been permanently ceased on any portion of the site, or temporarily ceased on any portion of the site and will not resume for a period exceeding 14 days…”

9 VAC 25-840-40(1) states: “Permanent or temporary soil stabilization shall be applied to denuded areas within seven days after final grade is reached on any portion of the site. Temporary soil stabilization shall be applied within seven days to denuded areas that may not be at final grade but will remain dormant for longer than 14 days. Permanent stabilization shall be applied to areas that are to be left dormant for more than one year.”

9 VAC 25-840-40(3) states: “A permanent vegetative cover shall be established on denuded areas not otherwise permanently stabilized. Permanent vegetation shall not be considered established until a ground cover is achieved that is uniform, mature enough to survive and will inhibit erosion.”
ENFORCEMENT AUTHORITY

Va. Code § 62.1-44.23 of the State Water Control Law provides for an injunction for any violation of the State Water Control Law, any State Water Control Board rule or regulation, an order, permit condition, standard, or any certificate requirement or provision. Va. Code §§ 62.1-44.15 and 62.144.32 provide for a civil penalty up to $32,500 per day of each violation of the same. In addition, Va. Code § 62.1-44.15 authorizes the State Water Control Board to issue orders to any person to comply with the State Water Control Law and regulations, including the imposition of a civil penalty for violations of up to $100,000. Also, Va. Code § 10.1-1186 authorizes the Director of DEQ to issue special orders to any person to comply with the State Water Control Law and regulations. Va. Code §§ 62.1-44.32(b) and 62.1-44.32(c) provide for other additional penalties.

The Court has the inherent authority to enforce its injunction, and the Court is authorized to award the Commonwealth its attorneys’ fees and costs.

FUTURE ACTIONS

DEQ staff wishes to discuss all aspects of their observations with you, including any actions needed to ensure compliance with state law and regulations, any relevant or related measures you plan to take or have taken, and a schedule, as needed, for further activities. In addition, please advise us if you dispute any of the observations recited herein or if there is other information of which DEQ should be aware. In order to avoid adversarial enforcement proceedings, Waste Management will be asked to enter into a Consent Order with the Department to formalize a plan and schedule of corrective action and to settle any outstanding issues regarding this matter, including the assessment of civil charges.

In the event that discussions with staff do not lead to a satisfactory conclusion concerning the contents of this letter, you may elect to participate in DEQ's Process for Early Dispute Resolution. In addition, if informal discussions do not lead to a satisfactory conclusion, 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. For further information on the Process for Early Dispute Resolution, please see Agency Policy Statement No. 8-2005 posted on the Department's website under "Programs," "Enforcement," and “Laws, Regulations, & Guidance” (http://www.deq.virginia.gov/Portals/0/DEQ/Enforcement/Guidance/process%20for%20early%20dispute%20resolution%20no8_2005.pdf) or ask the DEQ contact listed below.

Please contact Frank Lupini at (804)527-5093 or frank.lupini@deq.virginia.gov within 10 days of the date of this letter to discuss this matter and arrange a prompt meeting.
Sincerely,

Kyle Ivar Winter, P.E.
Deputy Regional Director

encl: February 6, 2019, February 22, 2019, March 6, 2019, March 18, 2019, April 29, 2019
Inspection Reports, Site Impact Table

cc w/ encl (via email):
Frank Lupini, PRO Enforcement Specialist
Julie Hamilton, U.S. Army Corps of Engineers
Steve Barten, Waste Management Incorporated
H. Scott Thacker, Waste Management Incorporated
Denise Williams, Charles City County
Jaime Robb, DEQ VWP & Stormwater
Derek A. Tribble, DEQ Stormwater
Jason Miller, DEQ Land Protection
Michele Clary, Golder Associates
### CONSTRUCTION GENERAL PERMIT SITE INSPECTION REPORT
#### LEVEL 1 (FOCUSED)

**Project Name:** Charles City WM Landfill  
**Permit Number:** VAR100808  
**Inspection Date:** 2/6/2019  
**Time:** 12:00pm  
**Inspector Name:** Elizabeth Weast  
**Regional Office:** PRO  
**Email:** Elizabeth.weast@deq.virginia.gov

**Project Address:** 8000 Chambers Road  
**County/City:** Charles City  
**Project Operator:** Waste Management of Virginia Inc  
**Operator Telephone:** (804) 966-7210  
**Project Contact:** Brian McClung  
**Contact Telephone:** (804) 561-5787  
**Contact E-Mail:** bmcclung@wm.com  
**Qualified Personnel (QP):** Steve Barten/Hawk Bowman

**Disturbed Acreage:**  
**Weather (Wet/Dry/Rain):** Dry

**Linear Project:** ☑ Yes ☐ No  
**Annual Stands. & Specs:** ☑ Yes ☐ No  
**VSMP Authority:** ☑ Locality ☐ DEQ

**Stage of Construction:**  
- ☑ Initial Clearing & Grading  
- ☑ Rough Grading  
- ☐ Building Construction  
- ☐ Final Grading  
- ☐ Construction of SWM Facilities  
- ☐ Final Stabilization  
- ☐ Notice of Termination  
- ☑ Other: __Borrow Area____

**Nature of Project:**  
- ☑ Public ☐ Private  
- ☐ State ☐ Federal  
- ☐ Other: __________  
- ☑ Yes ☐ No

### COVERAGE & POSTING REQUIREMENTS

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| Construction site has permit coverage? (Va. Code §62.1- 44.15:34.A)  
(9VAC25-870-310) |
| 2 | ☑   | ☐  | ☐   | ☑ Yes                        |                     |
| A copy of the notice of coverage letter is posted conspicuously near the main entrance of the construction activity? (CGP Part II.C) |
| 3 | ☑   | ☐  | ☐   | ☑ Yes                        | Corrected while on site.  
Notice of the location of the SWPPP is posted near the site’s entrance, if applicable, and information for public access is provided? (9VAC25-870-54.G)(CGP Part II D.2 & 3) |

### SWPPP AVAILABILITY AND CONTENTS

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<td>The SWPPP is on-site or made available during the inspection? (CGP Part II D.1 &amp; 2)(9VAC25-870-54.G)</td>
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<td>The SWPPP contains a signed copy of the registration statement? (CGP Part II A.1.a)</td>
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<td>The SWPPP includes, upon receipt, a copy of the notice of coverage letter and the CGP? (CGP Part II A.1.b &amp; c)</td>
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| 7 | ☑ | ☐ | ☐ | ☑ Yes                        | Steve Barton’s certifications are in the SWPPP, but he is not the person completing the inspection reports. Hawk Bowman is the person conducting/signing the inspection reports, but his certification is not provided.  
The SWPPP contains the name, phone number and qualifications of “Qualified Personnel” conducting inspections? (CGP Part II A.6) |
| 8 | ☑ | ☐ | ☐ | ☑ Yes                        |                     |
| The SWPPP contains an approved erosion and sediment control plan? (9VAC25-870-54.B)(CGP Part II.A.2) |
| 9 | ☑ | ☐ | ☐ | ☑ Yes                        | No stormwater management plan was included in the SWPPP or the site plans.  
The SWPPP contains an approved stormwater management plan or an existing construction site has a stormwater management plan? (9VAC25-870-54.C)(CGP Part II.A.3)  
Technical Criteria II.B ☑ III.C ❌ |
| 10 | ☑ | ☐ | ☐ | ☑ Yes                        |                     |
| The SWPPP contains a pollution prevention plan? (9VAC25-870-54.D)(CGP Part II.A.4) |
### ESC AND SWM CONTROL MEASURES

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### POLLUTION PREVENTION PRACTICES

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<th>N/A</th>
<th>Reviewed during re-inspection?</th>
<th>Comments/Description</th>
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### SITE EVALUATION AND AGENCY RECOMMENDATION

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
<th>Request for Corrective Action attached:</th>
<th>Comments/Description</th>
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<td>22</td>
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<td>☐</td>
<td>☒ Referred to Locality: ☒ Yes ☐ No</td>
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<td>23</td>
<td>☐</td>
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</tr>
</tbody>
</table>

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**Be advised** that this inspection is **focused** on portions of the applicable statutory and regulatory requirements only. The purpose of the inspection is to assess the general condition and compliance level of the construction site and to evaluate the need for a more comprehensive inspection by DEQ or the local VSMP, as applicable, or the presence of actual or potential adverse impacts. The inspector’s report is limited to the day, time, and specified statutory and regulatory requirements identified in the Report and Request for Corrective Action, if attached. Although some statutory or regulatory components may not be covered by this inspection report your responsibilities as the owner/operator are to comply with all applicable statutory and regulatory requirements.

---

Inspector Signature: Elizabeth Weast
Inspector Name: Elizabeth Weast  Regional Office: PRO  Email: Elizabeth.weast@deq.virginia.gov
# REQUEST FOR CORRECTIVE ACTION

<table>
<thead>
<tr>
<th>Checklist #</th>
<th>Regulatory Citation/Legal Requirement&lt;sup&gt;1&lt;/sup&gt;</th>
<th>Occurrence</th>
<th>Observation/Recommended Corrective Action</th>
</tr>
</thead>
</table>
| 7           | CGP Part II A.6                                  | 1st        | Observation: Qualified Personnel has not been identified in the SWPPP.  
**Recommended Corrective Action:** Qualified Personnel needs to be identified in accordance with the Construction General Permit. |
| 9           | 9VAC25-870-54.C  
CGP Part II.A.3 | 1st        | Observation: No stormwater management plan was observed in the SWPPP or the site plan.  
**Recommended Corrective Action:** Stormwater management plans should be included in accordance with the Construction General Permit requirements. |
| 11          | 9VAC25-840-40.4  
CGP Part II.B.2 | 1st        | Observation: Low lying areas do not have adequate perimeter controls installed; sediment is eroding off site.  
**Recommended Corrective Action:** Install additional erosion and sediment controls as needed. |
| 16          | CGP Part II E.1  
9VAC25-840-60.A | 1st        | Observation: Sediment basin 2 appears to be eroding heavily, silt fencing has not been maintained in multiple areas, diversions have not been maintained.  
**Recommended Corrective Action:** Install and maintain all erosion and sediment controls in accordance with the approved plans. |
| -           | CGP Part I.B.4.d(1)  
CGP Part II G | 1st        | Observation: Inspection reports are not being conducted at the required frequency, and inspection reports repeatedly identify the same problem without corrective action taking place.  
**Recommended Corrective Action:** Conduct inspections at the required frequency, in accordance with the Construction General Permit, and complete corrective actions in accordance with those inspection report findings. |

Comments: Portions of the site were not inspected, to include sediment basin 1 and a portion of the site perimeter that is not low-lying.

---

<sup>1</sup> Refers to applicable regulation found in the most recent publication of the State Water Control Law (Va. Code § 62.1-44.2 et seq.), Virginia Erosion and Sediment Control Regulations (9VAC25-840), the Virginia Stormwater Management Program (VSMP) Regulations (9VAC25-870), or the General VPDES Permit for Discharges of Stormwater from Construction Activities (9VAC25-880).
The recommended corrective action deadline date applies to all conditions noted on this report unless otherwise noted. If listed condition(s) currently constitute non-compliance and/or corrective actions are not completed by the deadline, other enforcement actions may be issued to the entity responsible for ensuring compliance on the above project.

Inspector Signature: ____________________________ Date Transmitted: 2/7/2019
CONSTRUCTION GENERAL PERMIT SITE INSPECTION
REPORT LEVEL 1 (FOCUSED)

Project Name: Charles City WM Landfill
Permit Number: VAR100808
Inspection Date: 2/6/2019
Time: 12:00pm

Inspector Name: Elizabeth Weast
Regional Office: PRO
Email: Elizabeth.weast@deq.virginia.gov

CONSTRUCTION GENERAL PERMIT SITE INSPECTION PHOTO LOG

Fig. 1
Description: Erosion of low lying area.

Fig. 2
Description: Erosion moving off site.

Fig. 3
Description: Gully erosion off site.

Fig. 4
Description: Erosion moving off site.
CONSTRUCTION GENERAL PERMIT SITE INSPECTION REPORT LEVEL 1 (FOCUSED)

Project Name: Charles City WM Landfill
Permit Number: VAR100808
Inspection Date: 2/6/2019
Time: 12:00pm

CONSTRUCTION GENERAL PERMIT SITE INSPECTION PHOTO LOG

Fig. 5
Description: Sediment Basin 2.

Fig. 6
Description: Sediment Basin 2.

Fig. 7
Description: Erosion into sediment basin 2.

Fig. 8
Description: Erosion into sediment basin 2.
CONSTRUCTION GENERAL PERMIT SITE INSPECTION REPORT LEVEL 1 (FOCUSED)

Project Name: Charles City WM Landfill
Permit Number: VAR100808
Inspection Date: 2/6/2019
Time: 12:00pm

Inspector Name: Elizabeth Weast
Regional Office: PRO
Email: Elizabeth.weast@deq.virginia.gov

CONSTRUCTION GENERAL PERMIT SITE INSPECTION PHOTO LOG

Fig. 9
Description: Erosion of embankment (SB2).

Fig. 10
Description: Erosion of embankment (SB2).

Fig. 11
Description: Erosion of sediment basin 2.

Fig. 12
Description: Erosion around slope drain entering SB2.
CONSTRUCTION GENERAL PERMIT SITE INSPECTION PHOTO LOG

Fig. 13
Description: Erosion of sediment basin 2, looking towards outfall structure.

Fig. 14
Description: Additional erosion near Figure 4.

Fig. 15
Description: Site plan.

Fig. 16
Description: Site plan.
Project Name | Charles City Landfill | VWP Permit # | NP 19-000617 | Inspection Dates | 02-22-2019 03-06-2019
--- | --- | --- | --- | --- | ---
Inspector Name | Cara Witte | Phone # & Email Address | 804-527-5075 cara.witte@deq.virginia.gov | Address or lat/long (if no permit no.) | Latitude: 37.430216° Longitude: -77.127710°
Others Present During Inspection | Elizabeth Weast, DEQ Stormwater; Brian McClung, Waste Management; Stephen Barten, Waste Management; Michele Clary, Golder; Denise Williams, Charles City County

**Project Background**

On February 7, 2019, DEQ VWP received information from Elizabeth Weast, DEQ Stormwater, about the possible discharge of sediment into surface waters due to failed erosion and sediment controls at the Charles City Landfill located in Charles City, Virginia. The report indicated that silt fences and sediment basins had not been installed and/or maintained in areas adjacent to surface waters and sediment may have eroded into jurisdictional surface waters.

**Inspection Results**

As a result of the information provided, DEQ VWP conducted an inspection of the Charles City Landfill located at 8000 Chambers Road in Charles City, Virginia (Parcel Numbers: 8-34, 14-116, 15-2) on February 22, 2019 with DEQ Stormwater and representatives from Charles City County, Waste Management Inc, and Golder Associates. During this inspection, photo points and soil profiles using a Dutch auger were taken at varying points throughout the waste management facility with special consideration given to areas mapped as jurisdictional surface waters as indicated on the USFWS National Wetlands Inventory Map dated October 15, 2018. Notes were taken about the presence/absence of hydric soils and saturated soils and/or surface water and whether sediment from upland areas or stormwater controls had been deposited within these jurisdictional waters. GPS points were also taken from the end points of observed sediment discharges to the upstream limit of impacts for each area and notes were taken about the community and degree of impact along the way. As a result of the February 22, 2019 inspection, a second DEQ VWP inspection was conducted on March 6, 2019.

From the DEQ inspections, impacts to surface waters appeared to be from a lack of proper installation and/or failure of erosion and sediment controls. Sediment from the site appears to have entered and settled into downstream channels, wetlands, and open water pond. The depth of sediment in stream channels may have either eliminated or significantly altered benthic and aquatic life habitat; physiochemical functions, such as nutrient and organic matter processing; groundwater/surface water exchange; and the hydraulic functions of the stream channels. Similarly, sediment deposited in wetlands has altered wetland ground- and surface water hydrology, eliminated and/or negatively impacted habitat, and negatively affected nutrient processing and flood attenuation functions of the waters affected.

Within the Charles City Landfill facility, it appears approximately 0.87 acre of palustrine forested wetland, 4.6 acres of palustrine scrub shrub wetland, and 4,678 linear feet of stream channel, including an unnamed tributary to Bradley Run, have been impacted from the lack of proper erosion and sediment controls with approximately 1-16 inches of sediment observed in varying locations throughout the facility. The extent of sediment deposition in these surface waters was captured and is shown on the attached map.
Table 1: Recommended Corrective Actions

<table>
<thead>
<tr>
<th>Recommended Corrective Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>As stated during the two DEQ VWP inspections (February 22 and March 6, 2019) and in DEQ correspondence dated March 14, 2019, please provide the following items to DEQ VWP:</td>
</tr>
<tr>
<td>1. Complete a wetland delineation of the facility in accordance with the 1987 Wetland Delineation Manual and applicable Regional Supplement. Quantify surface water impacts by site activities (clearing, grubbing, fill and/or sedimentation) in accordance with DEQ correspondence dated March 14, 2019. Please submit maps and data sheets for approval to DEQ by <strong>March 29, 2019</strong>, weather permitting.</td>
</tr>
<tr>
<td>2. Provide proposed corrective action concepts (restoration) and schedule to DEQ by <strong>April 19, 2019</strong> based on the February 22 and March 6, 2019 inspections and delineation findings. Detailed restoration plan to be submitted once conceptual plan is approved.</td>
</tr>
<tr>
<td>3. Begin to stabilize and take all necessary actions to prevent further discharges onsite.</td>
</tr>
</tbody>
</table>
Impact Area 1 total approx. 0.43 acre of PFO wetland

Impact Area 2 total approx. 4.6 acres of PSS wetland

Impact Area 3 totals approx. 0.44 acre of PFO wetland

Stream channel impacts total approx. 4,678 linear feet

Legend

- DEQ data points 03-06-2019
- DEQ data points 02-22-2019
- NHD Rivers
- Wetlands mapped by NWI

Date Created: 03/15/2019

Inspection dates: 02/22/2019 and 03/06/2019
### Site Inspection

**Site Name:** Charles City Landfill  
**Inspection Date:** 02-22-2019

<table>
<thead>
<tr>
<th>Photo</th>
<th>Description</th>
<th>Orientation</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Impact Area 1 (NWI mapped wetlands) with sediment present from adjacent unstable road bed</td>
<td>SE</td>
<td>02-22-2019</td>
</tr>
<tr>
<td>2</td>
<td>Impact Area 1 (NWI mapped wetlands) with sediment present from adjacent unstable road bed</td>
<td>SE</td>
<td>02-22-2019</td>
</tr>
<tr>
<td>3</td>
<td>Area upslope from Impact Area 1</td>
<td>S</td>
<td>02-22-2019</td>
</tr>
<tr>
<td>4</td>
<td>Impact Area 1</td>
<td>NW</td>
<td>02-22-2019</td>
</tr>
</tbody>
</table>
Site Inspection
Site Name: Charles City Landfill

Approximately 10 inches of sediment present. Impact Area 1
Orientation: N/A
Date: 02-22-2019

Third auger pull with native soils present. Impact Area 1
Orientation: N/A
Date: 02-22-2019

Impact Area 1
Orientation: NW
Date: 02-22-2019

Impact Area 1
Orientation: SE
Date: 02-22-2019
Site Inspection

Site Name: Charles City Landfill

Inspection Date: 02-22-2019

Photo 9
Stormwater conveyance within Part A/Northern Section
Orientation: S
Date: 02-22-2019

Photo 10
Stormwater inlet within Part A/Northern Section
Orientation: W
Date: 02-22-2019

Photo 11
Stormwater conveyance within Part A/Northern Section
Orientation: N
Date: 02-22-2019

Photo 12
Stormwater conveyance within Part A/Northern Section
Orientation: SW
Date: 02-22-2019
Site Inspection
Site Name: Charles City Landfill

Photo 13
Stormwater outfall from Sediment Basin SB-3. Sediment-laden waters present. Leading to Impact Area 2
Orientation: W
Date: 02-22-2019

Photo 14
Sediment-laden waters observed downstream of Sediment Basin SB-3. West of Impact Area 2
Orientation: E
Date: 02-22-2019

Photo 15
Sediment Basin SB-3 in Part A/Northern Section
Orientation: W
Date: 02-22-2019

Photo 16
Unstable slopes within Sediment Basin SB-3. Part A/Northern Section
Orientation: NE
Date: 02-22-2019
Site Inspection

Site Name: Charles City Landfill

Inspection Date: 02-22-2019

Photo 17  Stormwater conveyance within Part A/Northern Section
Orientation NW
Date 02-22-2019

Photo 18  Silt fence in need of maintenance. Adjacent to Impact Areas 2 and 3
Orientation N
Date 02-22-2019

Photo 19  Sedimentation within PFO wetlands located. Impact Area 3
Orientation NE
Date 02-22-2019

Photo 20  Approximately 8 inches of sediment present. Impact Area 3. First auger pull.
Orientation N/A
Date 02-22-2019
Photo 21
Orientation: N/A
Date: 02-22-2019

Photo 22
Impact Area 3
Orientation: SW
Date: 02-22-2019

Photo 23
Sediment-laden waters within Impact Area 3
Orientation: E
Date: 02-22-2019

Photo 24
Impact Area 3
Orientation: SE
Date: 02-22-2019
Site Inspection
Site Name: Charles City Landfill
Inspection Date: 02-22-2019

Photo 25
Impact Area 3
Orientation NW
Date 02-22-2019

Photo 26
Sediment-laden waters within Impact Area 3
Orientation SW
Date 02-22-2019

Photo 27
Impact Area 2
Orientation SW
Date 02-22-2019

Photo 28
Impact Area 2
Orientation SW
Date 02-22-2019
Site Inspection
Site Name: Charles City Landfill

Photo 29
Impact Area 2
Security fencing within PFO wetlands.
Orientation: NW
Date: 02-22-2019

Photo 30
Impact Area 2
Orientation: W
Date: 02-22-2019

Photo 31
Impact Area 2
Orientation: W
Date: 02-22-2019

Photo 32
Sediments present in the buffer area of the Borrow Area.
Orientation: N
Date: 02-22-2019
Site Inspection

Site Name: Charles City Landfill

Inspection Date: 02-22-2019

Photo 33
Borrow Area
Orientation: SW
Date: 02-22-2019

Photo 34
Unstable road banks adjacent to stormwater conveyance
Orientation: N
Date: 02-22-2019

Photo 35
PEM wetlands in Phase 1 Borrow Area/Reclamation Area
Orientation: SW
Date: 02-22-2019

Photo 36
PEM wetlands in Phase 1 Borrow Area/Reclamation Area
Orientation: E
Date: 02-22-2019
Site Inspection

Site Name: Charles City Landfill

Inspection Date: 02-22-2019

Photo 37
Unstable road banks adjacent to stormwater conveyance
Orientation: NW
Date: 02-22-2019

Photo 38
Open water in the Phase 1 Borrow Area/Reclamation Area
Orientation: NE
Date: 02-22-2019

Photo 39
Unstable banks adjacent to open water in the Phase 1 Borrow Area/Reclamation Area
Orientation: SW
Date: 02-22-2019

Photo 40
Unstable banks adjacent to open water in the Phase 1 Borrow Area/Reclamation Area
Orientation: W
Date: 02-22-2019
Site Inspection

Site Name: Charles City Landfill

Inspection Date: 03-06-2019

Photo 41: Open water pond located north of Sediment Basin 2
Orientation: SW
Date: 03-06-2019

Photo 42: Open water pond located north of Sediment Basin 2
Orientation: W
Date: 03-06-2019

Photo 43: Sediment Basin 2 in Borrow Area
Orientation: NE
Date: 03-06-2019

Photo 44: Sediment Basin 2 in Borrow Area
Orientation: E
Date: 03-06-2019
Site Inspection

Site Name: Charles City Landfill

Inspection Date: 03-06-2019

Photo 45  Sediment-laden waters adjacent to Sediment Basin 2
Orientation  W
Date  03-06-2019

Photo 46  Outfall of Sediment Basin 2
Orientation  S
Date  03-06-2019

Photo 47  Undisturbed stream channel adjacent to Impact Area 2
Orientation  NW
Date  03-06-2019

Photo 48  Confluence of undisturbed stream channel and Impact Area 3
Orientation  NW
Date  03-06-2019
Site Inspection

Site Name: Charles City Landfill  
Inspection Date: 03-06-2019

Photo 49  
Impact Area 2
Orientation: E  
Date: 03-06-2019

Photo 50  
Undisturbed PFO wetlands adjacent to Impact Area 2
Orientation: W  
Date: 03-06-2019

Photo 51  
Adjacent undisturbed PFO wetlands
Orientation: NW  
Date: 03-06-2019

Photo 52  
Impact Area 2
Orientation: SW  
Date: 03-06-2019
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<tr>
<td>53</td>
<td>Impact Area 2</td>
<td>W</td>
<td>03-06-2019</td>
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<tr>
<td>54</td>
<td>Impact Area 2 with approximate 8-12 inches of sediment present.</td>
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<td>03-06-2019</td>
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<tr>
<td>55</td>
<td>Impact Area 2 with approximate 8 inches of sediment present. Native soils present at tip of auger</td>
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<td>56</td>
<td>Sediment shelving present at Impact Area 2</td>
<td>N</td>
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</table>
Site Inspection
Site Name: Charles City Landfill

Photo 57
Outfall from Sediment Basin 2 within Borrow Area
Orientation: S
Date: 03-06-2019

Photo 58
Impact Area 2
Orientation: E
Date: 03-06-2019

Photo 59
Location of Sediment Basin in Phase III-A, Borrow Area/Southern Section
Orientation: S
Date: 03-06-2019

Photo 60
Borrow Area in Southern Section
Orientation: S
Date: 03-06-2019
Site Inspection

Site Name: Charles City Landfill

Inspection Date: 03-06-2019

Photo 61
Open water within the Phase 1 Borrow Area
Orientation: SW
Date: 03-06-2019

Photo 62
Sediment Basin SB-2 in Part A/Northern Section
Orientation: SW
Date: 03-06-2019

Photo 63
Sediment Basin SB-2 in Part A/Northern Section
Orientation: E
Date: 03-06-2019

Photo 64
Outfall of Sediment Basin SB-2 in Part A/Northern Section
Orientation: SE
Date: 03-06-2019
Site Inspection

Site Name: Charles City Landfill

Inspection Date: 03-06-2019

Photo 65  Sediment-laden waters entering unnamed tributary to Bradley Run
Orientation  SE
Date  03-06-2019

Photo 66  Unnamed tributary to Bradley Run
Orientation  E
Date  03-06-2019

Photo 67  Unnamed tributary to Bradley Run
Orientation  W
Date  03-06-2019

Photo 68  Non-impacted unnamed tributary to Bradley Run
Orientation  SE
Date  03-06-2019
Site Inspection

Site Name: Charles City Landfill

Inspection Date: 03-06-2019

Photo 69
Confluence of unnamed tributary and Bradley Run
Orientation NW
Date 03-06-2019

Photo 70
Bradley Run with intermittent sedimentation present
Orientation SW
Date 03-06-2019

Photo 71
Bradley Run with intermittent sedimentation present
Orientation NE
Date 03-06-2019

Photo 72
Bradley Run with intermittent sedimentation present
Orientation NE
Date 03-06-2019
## Site Inspection

**Site Name:** Charles City Landfill  
**Inspection Date:** 03-06-2019

<table>
<thead>
<tr>
<th>Photo</th>
<th>Description</th>
<th>Orientation</th>
<th>Date</th>
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<tbody>
<tr>
<td>73</td>
<td>Bradley Run with sediment-laden waters present</td>
<td>SW</td>
<td>03-06-2019</td>
</tr>
<tr>
<td>74</td>
<td>Sediment Basin SB-1 in Part A/Northern Section</td>
<td>W</td>
<td>03-06-2019</td>
</tr>
<tr>
<td>75</td>
<td>Outfall of Sediment Basin SB-1 in Part A/Northern Section</td>
<td>W</td>
<td>03-06-2019</td>
</tr>
<tr>
<td>76</td>
<td>Bradley Run downslope of Sediment Basin SB-1 in Part A/Northern Section</td>
<td>NE</td>
<td>03-06-2019</td>
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</tbody>
</table>
Site Inspection

Site Name: Charles City Landfill

Inspection Date: 03-06-2019

Photo 77
Sediment-laden waters observed north of Charles City Landfill. West Cool Hill Road
Orientation: S
Date: 03-06-2019

Photo 78
Sediment-laden waters observed north of Charles City Landfill. West Cool Hill Road
Orientation: N
Date: 03-06-2019
VWP INSPECTION REPORT

<table>
<thead>
<tr>
<th>Project Name</th>
<th>Maplewood Landfill</th>
<th>VWP Permit #</th>
<th>VWP 15-1661</th>
<th>Inspection Date</th>
<th>3/18/2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inspector Name</td>
<td>Cara Witte</td>
<td>Phone # &amp; Email Address</td>
<td>804-527-5075 <a href="mailto:cara.witte@deq.virginia.gov">cara.witte@deq.virginia.gov</a></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Address or lat/long (if no permit no.)</td>
<td>Others Present During Inspection</td>
<td>Allison Major, DEQ Stormwater; Travis Wood, DEQ Stormwater; Brian McClung, Waste Management; Stephen Barten, Waste Management; Michele Clary; Golder</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Project Background

On February 15, 2019, DEQ VWP received a 24-hour notification from Waste Management of Virginia Inc. notifying that a discharge of sediment into wetlands had occurred on February 14, 2019 due to failed erosion and sediment controls at the Maplewood Landfill located in Amelia County, Virginia. The report indicated that approximately 0.56 acre of wetland appears to have been impacted by this sedimentation resulting from super silt fence failures. The report also indicated that these super silt fence failures occurred in multiple areas due to erosion from a berm upslope of the super silt fence during the construction of Landfill Cells 23 and 26. As a result of this notification, DEQ VWP conducted a compliance inspection with DEQ Stormwater staff on March 18, 2019. The results of this inspection are presented below.

Inspection Results

DEQ VWP conducted an inspection of the Maplewood Landfill located at 20221 Maplewood Road in Amelia County on March 18, 2019 with DEQ Stormwater and representatives from Waste Management Inc. and Golder Associates. During this inspection, DEQ reviewed the impact areas as mapped by Golder Associates and took soil profiles using a Dutch auger in the areas where corrective action (ie sediment removal) had taken place. Notes were taken about the presence/absence of sediment deposition, hydric, and/or saturated soils.

From this DEQ inspection and as reported in the Maplewood Landfill Corrective Action Plan submitted to DEQ on April 5, 2019, it appears approximately 0.42 acres of palustrine emergent wetland, 0.22 acre of palustrine scrub shrub wetland, and 0.14 acre of palustrine forested wetlands have been impacted as a result of failed and/or inadequate erosion and sediment controls within the site with sediment deposition ranging from 1-12 inches. In addition, it appears 11 feet of intermittent stream channel and 18 linear feet of ephemeral stream channel has also been impacted by failed and/or inadequate erosion and sediment controls (See map attached). As reported by Waste Management, it appears sediment from the berm upslope of the silt fence overtopped ESC controls and deposited in the downslope wetlands.

While residual sedimentation (less than 2 inches) was observed in Impact Areas 1-4, DEQ observed approximately 3-4 inches of compost material in these areas placed as “applied to prevent a violation of Virginia Erosion and Sediment Control law, which requires disturbed areas to be covered in 7 days.” (explained in email correspondence dated March 28, 2019) See Photos 10-12. No sediment removal has taken place in Impact Area 5 with approximately 8-12 inches of sediment still present in this area along with compost staged for application. See Photos 1-7.

In addition to the impacts to surface waters associated with the sediment release, it appears the 30 foot reinforced concrete pipes have not been installed as depicted in “Proposed Culvert Locations and Cross Sections, Figure 9, dated March 14, 2016, revised March 23, 2016 (Photos 12 and 28) for DEQ VWP 15-1611. As well, from Google Earth Imagery dated December 31, 2008 and from the Maplewood Landfill Final Wetland Delineation Map, Figure 2-1523851, dated June 2015, it appears at least approximately1032 linear feet of stream channel may have been impacted from the construction of Phase 26 and 27 cells and additional unauthorized impacts to surface waters may be present.
Compliance Deliverables ☒ Not Assessed

<table>
<thead>
<tr>
<th>Compensation Completed</th>
<th>Reporting</th>
<th>On-Site Monthly Inspections Completed</th>
</tr>
</thead>
<tbody>
<tr>
<td>☒ Yes</td>
<td>Preconstruction Notice Received:</td>
<td>☐ Yes</td>
</tr>
<tr>
<td>☐ No</td>
<td>☒ Yes</td>
<td>☐ No</td>
</tr>
<tr>
<td>☐ N/A</td>
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<td>☐ N/A</td>
</tr>
<tr>
<td></td>
<td>☐ No</td>
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</tr>
<tr>
<td></td>
<td>☒ Yes</td>
<td>☐ N/A</td>
</tr>
</tbody>
</table>

Recommended Corrective Actions

- Remove remaining sediment and compost material using manual removal methods (ie. buckets and shovels) until native soils are met. Mechanized equipment is not approved for the removal of compost or sediment in any Impact Areas as depicted on the figure entitled ‘Wetland and Sediment Delineation Map (1 of 2) and (2 of 2)”.
- Per the Corrective Action Plan submitted to DEQ on April 5, 2019, replant all wetland areas impacts by sedimentation and fill (ie compost) with native wetland shrub scrub species at 400 stems per acre or more. Please submit a planting plan (with genus and species of each plant species) to DEQ for approval prior to purchasing plants or planting. Do not plant loblolly pine or red maple as these will reestablish on their own. In addition, do not plant ash species due to the potential presence of the Emerald Ash Borer.
- Per Corrective Action Plan submitted to DEQ on April 5, 2019, reseed all wetland areas impacted with the listed native wetland seed mix (VA Southern Piedmont FACW Mix- ERNMX-865). The use of ground cover crops in any wetland area (PFO, PSS, or PEM) is not approved.
- Contact DEQ VWP once all sediment removal effort has been completed for a reinspection.
<table>
<thead>
<tr>
<th>Photo 1</th>
<th>Compost amendments added to Impact Area 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Orientation</td>
<td>NW</td>
</tr>
<tr>
<td>Date</td>
<td>03-18-2019</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Photo 2</th>
<th>Edge of sedimentation area at the Impact Area 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Orientation</td>
<td>W</td>
</tr>
<tr>
<td>Date</td>
<td>03-18-2019</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Photo 3</th>
<th>Sedimentation on the north side of Impact Area 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Orientation</td>
<td>N</td>
</tr>
<tr>
<td>Date</td>
<td>03-18-2019</td>
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</table>

<table>
<thead>
<tr>
<th>Photo 4</th>
<th>Sedimentation within Impact Area 6</th>
</tr>
</thead>
<tbody>
<tr>
<td>Orientation</td>
<td>SW</td>
</tr>
<tr>
<td>Date</td>
<td>03-18-2019</td>
</tr>
</tbody>
</table>
VWPP Site Inspection Photo Log

Site Name: Maplewood Landfill
Permit Number: VWP 15-1661

Date: 03-18-2019

Photo 5  Sedimentation behind super silt fence at Impact Area 6
Orientation Date
E 03-18-2019

Photo 6  Sedimentation (approximately 8-12 inches) at the northwest edge of Impact Area 6, just south of the southern berm.
Orientation Date
NW 03-18-2019

Photo 7  Auger pull of sediment in Impact Area 6
Orientation Date
N/A 03-18-2019

Photo 8  Sedimentation in Impact Area 5
Orientation Date
N 03-18-2019
<table>
<thead>
<tr>
<th>Photo</th>
<th>Description</th>
<th>Orientation</th>
<th>Date</th>
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<tbody>
<tr>
<td>9</td>
<td>Sedimentation in Impact Area 5</td>
<td>S</td>
<td>03-18-2019</td>
</tr>
<tr>
<td>10</td>
<td>Compost amendments added to Impact Area 5</td>
<td>NW</td>
<td>03-18-2019</td>
</tr>
<tr>
<td>11</td>
<td>Sedimentation in Impact Area 5</td>
<td>E</td>
<td>03-18-2019</td>
</tr>
<tr>
<td>12</td>
<td>Compost amendments and sedimentation in Impact Area 5</td>
<td>NE</td>
<td>03-18-2019</td>
</tr>
</tbody>
</table>
**VWPP Site Inspection Photo Log**

**Site Name:** Maplewood Landfill  
**Permit Number:** VWP 15-1661  
**Date:** 03-18-2019

<table>
<thead>
<tr>
<th>Photo</th>
<th>Description</th>
<th>Orientation</th>
<th>Date</th>
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<tbody>
<tr>
<td>13</td>
<td>Auger pull in Impact Area 5</td>
<td>N/A</td>
<td>03-18-2019</td>
</tr>
<tr>
<td>14</td>
<td>Auger pull in Impact Area 5</td>
<td>N/A</td>
<td>03-18-2019</td>
</tr>
<tr>
<td>15</td>
<td>Auger pull in Impact Area 5</td>
<td>N/A</td>
<td>03-18-2019</td>
</tr>
<tr>
<td>16</td>
<td>Glayed soil from auger pull in Impact Area 5</td>
<td>N/A</td>
<td>03-18-2019</td>
</tr>
</tbody>
</table>
VWPP Site Inspection Photo Log

Site Name: Maplewood Landfill
Permit Number: VWP 15-1661

Date: 03-18-2019

Photo 17  Sedimentation at Impact Area 4
Orientation     NW
Date            03-18-2019

Photo 18  Hydric soil in auger pull from Impact Area 4
Orientation     N/A
Date            03-18-2019

Photo 19  Sedimentation in Impact Area 1
Orientation     NE
Date            03-18-2019

Photo 20  Sedimentation in Impact Area 1
Orientation     NW
Date            03-18-2019
Site Name: Maplewood Landfill
Permit Number: VWP 15-1661

Date: 03-18-2019

Photo 21
Orientation: W
Date: 03-18-2019

Sedimentation in Impact Area 7

Photo 22
Orientation: S
Date: 03-18-2019

Sedimentation in Impact Area 7

Photo 23
Orientation: NW
Date: 03-18-2019

Overhead utility corridor, PEM conversion area permitted

Photo 24
Orientation: NE
Date: 03-18-2019

Overhead utility corridor, PEM conversion area permitted
VWPP Site Inspection Photo Log

Site Name: Maplewood Landfill
Permit Number: VWP 15-1661
Date: 03-18-2019

Photo 25  Sedimentation in the Impact Area 7
Orientation  W
Date  03-18-2019

Photo 26  Sedimentation in Impact Area 7
Orientation  W
Date  03-18-2019

Photo 27  Erosion and sediment control measures upslope of Impact Area 7
Orientation  N
Date  03-18-2019

Photo 28  Compost material placed in PSS and PEM wetlands. No culvert observed as permitted in 15-1661.
Orientation  SW
Date  03-18-2019
Impacts to stream channels appear to total at least 451 linear feet.

Impacts to stream channels appear to total at least 581 linear feet.
# CONSTRUCTION GENERAL PERMIT SITE INSPECTION REPORT
## LEVEL 2 (COMPREHENSIVE)

### Project Information
- **Project Name:** Charles City County Landfill Soil Borrow Area
- **Permit Number:** VAR100808
- **Project Address:** 8000 Chambers Road
- **County/City:** Charles City
- **Project Operator:** Waste Management of Virginia Inc
- **Operator Telephone:** 804-966-7210
- **Project Contact:** Brian McClung
- **Contact Telephone:** 804-966-7210
- **Contact E-Mail:** bmclung@wm.com
- **Qualified Personnel (QP):** Hawk Bowman
- **Inspector:** Elizabeth Weast
- **Weather:** Dry/Overcast
- **Total Dist. Acres Permitted:** 46.18
- **Est. Dist. Acres (At time of inspection):** -
- **Inspection Date & Time:** 4/29/2019 at 9:00am
- **Linear Project:** Yes
- **Annual Stands. & Specs:** Yes
- **VSMP Authority:** Locality DEQ
- **Stage of Construction:**
  - Initial Clearing & Grading: No
  - Construction of SWM Facilities: No
  - Rough Grading: Yes
  - Building Construction: No
  - Final Grading: Yes
  - Final Stabilization: No
  - Notice of Termination: Yes
  - Other: Borrow area
- **Nature of Project:** Re-Inspection
- **Coverage & Posting Requirements:**
  - Construction site has permit coverage? (Va. Code §62.1- 44.15:34.A) (9VAC25-870-310)
  - A copy of the notice of coverage letter is posted conspicuously near the main entrance of the construction activity? (CGP Part II.C)
  - Notice of the location of the SWPPP is posted near the site’s entrance, if applicable, and information for public access is provided? (9VAC25-870-54.G)(CGP Part II D.2 & 3)
- **SWPPP Availability and Contents:**
  - The SWPPP is on-site or made available during the inspection? (CGP Part II D.1 & 2)(9VAC25-870-54.G)
  - The SWPPP contains a signed copy of the registration statement? (CGP Part II A.1.a)
  - The SWPPP includes, upon receipt, a copy of the notice of coverage letter and the CGP? (CGP Part II A.1.b & c)
  - The SWPPP includes a narrative description of the nature of the construction activity, including the function of the project? (CGP Part II A.1.d)
  - The SWPPP includes a legible site plan identifying all appropriate measures and that includes the locations of support activities and the onsite rain gauge, when applicable? (CGP Part II A.1.e(1-7))
  - The SWPPP contains an approved erosion and sediment control plan? (9VAC25-870-54.B)(CGP Part II.A.2)
  - The SWPPP contains an approved stormwater management plan or an existing construction site has a stormwater management plan that ensures compliance with the water quality and quantity requirements? (9VAC25-870-54.C)(CGP Part II.A.3)

---

**Comments/Description**
- Posted on the window of the scale building.
- \( x \)
- \( x \)
<p>| | | | |</p>
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<tbody>
<tr>
<td><strong>11</strong></td>
<td>The SWPPP contains an adequate pollution prevention plan? (9VAC25-870-54.D)</td>
<td>x</td>
<td></td>
</tr>
<tr>
<td><strong>12</strong></td>
<td>The SWPPP identifies impaired water(s), approved TMDL, pollutant(s) of concern, exceptional waters and the additional controls measures applicable? (9VAC 25-870-54.E)</td>
<td>x</td>
<td></td>
</tr>
<tr>
<td><strong>13</strong></td>
<td>The SWPPP contains the name, phone number and qualifications of “Qualified Personnel” conducting inspections? (CGP Part II A.6)</td>
<td>x</td>
<td>Hawk Bowman</td>
</tr>
<tr>
<td><strong>14</strong></td>
<td>Delegation of Authority is provided and signed in accordance with Part III K? (CGP Part II A.7)</td>
<td>x</td>
<td>No Delegation of Authority called out. Hawk Bowman has been signing Inspection Reports.</td>
</tr>
<tr>
<td><strong>15</strong></td>
<td>The SWPPP is signed and dated in accordance with Part III K? (CGP Part II A.8)</td>
<td>x</td>
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</table>

### SWPPP AMENDMENTS, MODIFICATIONS AND UPDATES

<table>
<thead>
<tr>
<th></th>
<th></th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
<th>Comments/Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>16</strong></td>
<td>Is the SWPPP being amended whenever there is a change in the design, construction, operation, or maintenance that has a significant effect on the discharge of pollutants to surface waters? (CGP Part II B(1))</td>
<td>x</td>
<td></td>
<td>No modifications have been noted.</td>
<td></td>
</tr>
<tr>
<td><strong>17</strong></td>
<td>Has the SWPPP been amended if inspections or investigations by the operator’s qualified personnel, or by local, state or federal officials find that existing control measures are ineffective in minimizing pollutants in discharges? (CGP Part II B(2))</td>
<td>x</td>
<td></td>
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<td></td>
</tr>
<tr>
<td><strong>18</strong></td>
<td>Contractor(s) that will implement and maintain each control measure are identified? (CGP Part II B(3))</td>
<td>x</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>19</strong></td>
<td>Have there been updates to the SWPPP when any modifications to its implementation have occurred, including a record of dates when major grading activities occur, construction activities temporarily or permanently cease on a portion of the site or stabilization measures are initiated? (CGP Part II B(4))</td>
<td>x</td>
<td></td>
<td>No modifications have been made. No grading activity has been recorded.</td>
<td></td>
</tr>
<tr>
<td><strong>20</strong></td>
<td>Is there documentation in the SWPPP of replaced or modified controls? (CGP Part II B(5))</td>
<td>x</td>
<td></td>
<td></td>
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</tr>
<tr>
<td><strong>21</strong></td>
<td>Is the SWPPP updated to indicate areas that have reached final stabilization? (CGP Part II B(6))</td>
<td>x</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>22</strong></td>
<td>Is the SWPPP updated to indicate properties that are no longer under the legal control of the operator and the dates on which the operator no longer had legal control over each property? (CGP Part II B(7))</td>
<td>x</td>
<td></td>
<td></td>
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</tr>
<tr>
<td><strong>23</strong></td>
<td>Does the SWPPP identify the date of any prohibited discharges, the volume released, actions taken to minimize the impact of the release and measures taken to prevent the recurrence of any prohibited discharge? (CGP Part II B(8))</td>
<td>x</td>
<td></td>
<td>SWPPP does not list prohibited sediment discharges investigated on previous inspections.</td>
<td></td>
</tr>
<tr>
<td><strong>24</strong></td>
<td>Amendments, modifications, or updates to the SWPPP are signed in accordance with Part III K? (CGP Part II B(9))</td>
<td>x</td>
<td></td>
<td>None have been recorded.</td>
<td></td>
</tr>
</tbody>
</table>

### INSPECTIONS AND CORRECTIVE ACTIONS

<table>
<thead>
<tr>
<th></th>
<th></th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
<th>Comments/Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>25</strong></td>
<td>Inspections required by the SWPPP are conducted at the required frequency, including a modified frequency for impaired water(s), approved TMDL(s), and exceptional waters when applicable? (CGP Part II F (1)) (CGP Part II A.5,b.3)</td>
<td>x</td>
<td></td>
<td>No Delegation of Authority documented; Qualified Personnel is signing the SWPPP inspections. Inspections beginning 4/5/19 state that no corrective actions are needed on site.</td>
<td></td>
</tr>
<tr>
<td><strong>26</strong></td>
<td>Inspection reports are completed and signed in accordance with CGP Part II F (3-4)? (CGP Part II F (3-4))</td>
<td>x</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>ESC AND SWM PLAN IMPLEMENTATION</td>
<td>Yes</td>
<td>No</td>
<td>N/A</td>
<td>Comments/Description</td>
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</tr>
<tr>
<td>27</td>
<td>Corrective actions are taken consistent with the requirements of the CGP? (CGP Part II G(1-2))</td>
<td>☒</td>
<td>☑</td>
<td>☑</td>
<td></td>
</tr>
<tr>
<td>28</td>
<td>Sequencing of the project is implemented in accordance with the approved erosion and sediment control plan and stormwater management plans? (9VAC25-870-54.B and C)</td>
<td>☒</td>
<td>☑</td>
<td>☑</td>
<td>Large areas have been cleared but have not undergone grading to direct flow to the sediment basins. The areas in question either have concentrated flow directed to silt fence or have no perimeter controls at all.</td>
</tr>
<tr>
<td>29</td>
<td>Have all denuded areas requiring temporary or permanent stabilization been stabilized, and have stabilization requirements for impaired waters, approved TMDL(s), pollutants of concern and exceptional waters, when applicable, been met? (9VAC 25-840-40.1) (9VAC25-870-54.B) (9VAC25-880-60) (CGP Part I F.1(a)) (CGP Part II A.5.b(1)) (CGP Part II A.2.(c) (8)) (CGP II E(1-2))</td>
<td>☒</td>
<td>☑</td>
<td>☑</td>
<td>Large amount of denuded area that is not associated with current borrow activity.</td>
</tr>
<tr>
<td>30</td>
<td>Are soil stockpiles adequately stabilized with seeding and/or protected with sediment trapping measures? (9VAC 25-840-40.2) (CGP Part II A.2.(c)) (9VAC25-870-54.B)</td>
<td>☒</td>
<td>☑</td>
<td>☑</td>
<td></td>
</tr>
<tr>
<td>31</td>
<td>A permanent vegetative cover has been established that is uniform, mature enough to survive and will inhibit erosion? (9VAC 25-840-40.3) (CGP Part II A.2.(c)) (CGP II E(1-2)) (9VAC25-870-54.B)</td>
<td>☒</td>
<td>☑</td>
<td>☑</td>
<td>Areas to remain dormant for longer than 1 year shall be permanently stabilized. Areas to remain dormant for longer than 14 days require temporary seeding</td>
</tr>
<tr>
<td>32</td>
<td>Have sediment trapping facilities been constructed as the first step in land disturbance activities? (9VAC 25-840-40.4) (CGP Part II A.2.(c)) (CGP II E(1-2)) (9VAC25-870-54.B)</td>
<td>☒</td>
<td>☑</td>
<td>☑</td>
<td>Areas of land disturbance have no perimeter controls.</td>
</tr>
<tr>
<td>33</td>
<td>Have earthen structures been stabilized immediately after installation? (9VAC 25-840-40.5) (CGP Part II A.2.(c)) (CGP II E(1-2)) (9VAC25-870-54.B)</td>
<td>☒</td>
<td>☑</td>
<td>☑</td>
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<tr>
<td>34</td>
<td>Are sediment traps and basins installed in accordance with MS-6 and the approved plan? (9VAC 25-840-40.6) (CGP Part II A.2.(c) (9)) (CGP Part II A.2.(c)) (CGP II E(1-2)) (9VAC25-870-54.B)</td>
<td>☒</td>
<td>☑</td>
<td>☑</td>
<td></td>
</tr>
<tr>
<td>35</td>
<td>Are finished cut and fill slopes adequately stabilized to prevent or correct excessive erosion? (9VAC 25-840-40.7) (CGP Part II A.2.(c)) (CGP II E(1-2)) (9VAC25-870-54.B)</td>
<td>☒</td>
<td>☑</td>
<td>☑</td>
<td></td>
</tr>
<tr>
<td>36</td>
<td>Is concentrated runoff down cut or fill slopes contained in an adequate permanent or temporary structure? (9VAC 25-840-40.8) (CGP Part II A.2.(c)) (CGP II E(1-2)) (9VAC25-870-54.B)</td>
<td>☒</td>
<td>☑</td>
<td>☑</td>
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<tr>
<td>37</td>
<td>Is adequate drainage or other protection provided for water seeps? (9VAC 25-840-40.9) (CGP Part II A.2.(c)) (CGP II E(1-2)) (9VAC25-870-54.B)</td>
<td>☒</td>
<td>☑</td>
<td>☑</td>
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<tr>
<td>38</td>
<td>Do all operational storm sewer inlets have adequate inlet protection? (9VAC 25-840-40.10) (CGP Part II A.2.(c)) (CGP II E(1-2)) (9VAC25-870-54.B)</td>
<td>☒</td>
<td>☑</td>
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<tr>
<td>39</td>
<td>Are stormwater conveyance channels adequately stabilized with channel lining and/or outlet protection? (9VAC 25-840-40.11) (CGP Part II A.2.(c)) (CGP II E(1-2)) (9VAC25-870-54.B)</td>
<td>☒</td>
<td>☑</td>
<td>☑</td>
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<tr>
<td>40</td>
<td>Is in-stream construction conducted using measures to minimize channel damage? (9VAC 25-840-40.12) (CGP Part II A.2.(c)) (CGP II E(1-2)) (9VAC25-870-54.B)</td>
<td>☒</td>
<td>☑</td>
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<tr>
<td>41</td>
<td>Are temporary stream crossings of non-erodible material installed where applicable? (9VAC 25-840-40.13) (CGP Part II A.2.(c)) (CGP II E(1-2)) (9VAC25-870-54.B)</td>
<td>☒</td>
<td>☑</td>
<td>☑</td>
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<tr>
<td>42</td>
<td>Is necessary restabilization of in-stream construction complete? (9VAC 25-840-40.15) (CGP II E(1-2)) (9VAC25-870-54.B)</td>
<td>☒</td>
<td>☑</td>
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</tr>
<tr>
<td></td>
<td>Description</td>
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<td>No</td>
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<td>Comments/Description</td>
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</tr>
<tr>
<td>43</td>
<td>Are utility trench operations conducted and stabilized in accordance with</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>MS-16? (9VAC 25-840-40.16) (CGP Part II A.2(c)) (CGP II E(1-2)) (9VAC25-870-54.B)</td>
<td></td>
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</tr>
<tr>
<td>44</td>
<td>Are soil and mud kept off paved or public roads to minimize the transport</td>
<td>x</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>of sediment? (9VAC 25-840-40.17) (CGP Part II A.2(c)) (CGP II E(1-2)) (9VAC25-870-54.B)</td>
<td></td>
<td></td>
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<tr>
<td>45</td>
<td>Have all temporary control structures that are no longer needed been</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>removed and disturbed soil resulting from their removal permanently</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>stabilized? (9VAC 25-840-40.18) (CGP Part II A.2(c)) (CGP II E(1-2)) (9VAC25-870-54.B)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>46</td>
<td>Are properties and waterways downstream from development adequately</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>protected from erosion, sediment and damage in accordance with the</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>standards and criteria specified by 9VAC25-840.19(a-n)? (9VAC 25-840-40.19(a-n))</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>47</td>
<td>Are all control measures properly maintained in effective operating</td>
<td></td>
<td></td>
<td></td>
<td>Sediment Basins 1 &amp; 2, small sections of silt fencing.</td>
</tr>
<tr>
<td></td>
<td>condition in accordance with good engineering practices and, where</td>
<td></td>
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<tr>
<td></td>
<td>applicable, manufacturer specifications? (CGP Part II E.1) (9VAC25-840-60.A)</td>
<td></td>
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</tr>
<tr>
<td>48</td>
<td>Permanent control measures included in the SWPPP are in place?</td>
<td></td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(9VAC25-870-54.C) (9VAC25-880-60) (CGP Part II F.1(a))</td>
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</table>

**POLLUTION PREVENTION PLAN IMPLEMENTATION**

<table>
<thead>
<tr>
<th></th>
<th>Description</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
<th>Comments/Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>49</td>
<td>Practices are in place to prevent and respond to leaks, spills, and other</td>
<td></td>
<td>X</td>
<td></td>
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<tr>
<td></td>
<td>releases including (i) procedures for expeditiously stopping, containing,</td>
<td></td>
<td></td>
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<td></td>
<td>and cleaning up spills, leaks, and other releases; and (ii) procedures for</td>
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<td></td>
<td>reporting leaks, spills, and other releases in accordance with Part III G?</td>
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<td></td>
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<tr>
<td></td>
<td>(CGP Part II A.4.e(1))(9VAC25-870-56)</td>
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</tr>
<tr>
<td>50</td>
<td>Practices are in place to prevent the discharge of spilled and leaked fuels</td>
<td></td>
<td>X</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>and chemicals from vehicle fueling and maintenance activities? (CGP Part II</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>A.4.e(2))(9VAC25-870-56)</td>
<td></td>
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</tr>
<tr>
<td>51</td>
<td>Practices are in place to prevent the discharge of soaps, solvents,</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>detergents, and wash water from construction materials, including the</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>clean-up of stucco, paint, form release oils, and curing compounds? (CGP</td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td>Part II A.4.e(3))(9VAC25-870-56)</td>
<td></td>
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<tr>
<td>52</td>
<td>Practices are in place to minimize the discharge of pollutants from vehicle</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>and equipment washing, wheel wash water, and other types of washing?</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>(CGP Part II A.4.e(4))(9VAC25-870-56)</td>
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<tr>
<td>53</td>
<td>Concrete wash water is directed into a leak-proof container or leak-proof</td>
<td></td>
<td>X</td>
<td></td>
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<td></td>
<td>settling basin? (CGP Part II A.4.e(5))(9VAC25-870-56)</td>
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<tr>
<td>54</td>
<td>Practices are in place to minimize the discharge of pollutants from storage,</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>handling, and disposal of construction products, materials, and wastes?</td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td></td>
<td>(CGP Part II A.4.e(6))(9VAC25-870-56)</td>
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<td></td>
</tr>
<tr>
<td>55</td>
<td>Practices are in place to prevent the discharge of fuels, oils, and other</td>
<td></td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>petroleum products, hazardous or toxic wastes, and sanitary wastes? (CGP</td>
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<tr>
<td></td>
<td>Part II A.4.e(7))(9VAC25-870-56)</td>
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<tr>
<td>56</td>
<td>Practices are in place to minimize any other discharge from the potential</td>
<td></td>
<td>X</td>
<td></td>
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<tr>
<td></td>
<td>pollutant-generating activities not addressed above, when applicable? (CGP</td>
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<td></td>
<td>Part II A.4.e(8))(9VAC25-870-56)</td>
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<tr>
<td></td>
<td>SITE EVALUATION AND AGENCY RECOMMENDATION</td>
<td>Yes</td>
<td>No</td>
<td>N/A</td>
<td>Request for Corrective Action attached:</td>
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<tr>
<td>57</td>
<td>Measures have been taken to prevent adverse impact(s) to receiving waters? (CGP Part I B.6)( Part I G.1)(Part II G.2)(Part II A.4.e(1-6))</td>
<td></td>
<td>☒</td>
<td></td>
<td>□ Yes □ No</td>
</tr>
<tr>
<td>58</td>
<td>VA DEQ’s Risk Based Inspection Strategy has been satisfied. No local VSMP Authority or comprehensive DEQ re-inspection is required at this time.</td>
<td></td>
<td>☒</td>
<td></td>
<td>□ Yes □ No</td>
</tr>
<tr>
<td>59</td>
<td>Site inspection results are such that immediate or subsequent recommendation for issuance of a Warning Letter or Notice of Violation is NOT required.</td>
<td></td>
<td>☒</td>
<td></td>
<td>□ Yes □ No</td>
</tr>
</tbody>
</table>

Inspector Signature: [Signature] Date: 05/06/2019
### CONSTRUCTION GENERAL PERMIT SITE INSPECTION REPORT

#### REQUEST FOR CORRECTIVE ACTION

**Project Name:** WM Landfill Borrow Area  
**Permit Number (if applicable):** VAR100808  
**Date:** 04/29/2019

<table>
<thead>
<tr>
<th>Checklist #</th>
<th>Regulatory Citation/Legal requirement</th>
<th>Occurrence</th>
<th>Observation/Recommended Corrective Action</th>
</tr>
</thead>
</table>
| 14          | CGP Part II A.7 CGP Part III K.2      | 1          | **Observation:** No Delegated Authority has been identified in the SWPPP.  
**Recommended Corrective Action:** Ensure that the Delegation of Authority is signed and included in the SWPPP |
| 16, 17, 19, 20 | CGP Part II B.1 & 2  
9VAC25-870-54.G  
CGP Part II B.4.a | 1 | **Observation:** The SWPPP does not contain any amendments, modifications, or corrective actions that have occurred on site.  
**Recommended Corrective Action:** Any modifications/changes/corrective actions to the Erosion and Sediment Control plan needs to be recorded in the SWPPP in accordance with the Construction General Permit. This includes major grading activity, such as basin installation, and stabilization. |
| 18          | CGP Part II B.3                      | 1          | **Observation:** The contactor responsible for the implementation and maintenance of the Erosion and Sediment Controls has not been identified.  
**Recommended Corrective Action:** Identify the contractors in the SWPPP that will implement and maintain each control measure, as required by the construction general permit. |
| 23          | CGP Part II B.4 (e-f)                | 1          | **Observation:** Sediment discharges noted on previous Construction General Permit Inspection Report(s) and VWP inspections have not been recorded in the SWPPP.  
**Recommended Corrective Action:** Identify in the SWPPP the date of any prohibited discharges along with all other information as required by the Construction General Permit. |
| 26          | CGP Part II F.3 & 4                  | 1          | **Observation:** Inspections are not being signed by the Operator or a Delegated Authority; no Delegated Authority has been identified. Beginning 4/5/19, there are no ESC deficiencies on site that require corrective action; this conflicts with the inspection conducted 4/29/2019.  
**Recommended Corrective Action:** Ensure that inspection reports are completed and signed in accordance with the Construction General Permit. Ensure inspections are being conducted and completed thoroughly in accordance with the Construction General Permit. |
<table>
<thead>
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</thead>
<tbody>
<tr>
<td>28</td>
<td>Observation: Large areas have been cleared but have not undergone grading to direct flow to the sediment basins. The areas in question either have concentrated flow directed to silt fence or have no perimeter controls at all. (Figures 7-8). Grading work after clearing to direct flows to the sediment basins does not appear to have been completed. (Fig. 7 &amp; 9) <strong>Recommended Corrective Action:</strong> Implement and follow the approved erosion and sediment control construction sequence.</td>
<td></td>
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<td></td>
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</tr>
<tr>
<td>29, 31</td>
<td>Observation: Denuded areas have not been stabilized in accordance with Minimum Standard 1, 2, 3 and 5. (Fig. 12). <strong>Recommended Corrective Action:</strong> Stabilize areas in accordance with the approved erosion and sediment control plan, construction general permit and Minimum Standard 1, 2, 3, and 5.</td>
<td></td>
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</tr>
<tr>
<td>32</td>
<td>Observation: Denuded areas do not have perimeter controls installed. Diversions and conveyance channels have not been constructed per the approved ESC plan. (Fig. 9 &amp; 10) <strong>Recommended Corrective Action:</strong> Install sediment trapping facilities in accordance with the approved erosion and sediment control plan, the construction general permit, and Minimum Standard 4. Install diversions to sediment basins 1 and 2 as shown on the erosion and sediment control plan.</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>34</td>
<td>Observation: Sediment Basins do not appear to be installed in accordance with the approved plan or Minimum Standard 6. (Figs. 1, 2, 4, 6) <strong>Recommended Corrective Action:</strong> Ensure that sediment basins/trap are installed in accordance with the approved erosion and sediment control plan, the construction general permit and Minimum Standard 6.</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>46, 47</td>
<td>Observation: The Sediment Basins do not appear to be functioning as intended. Sediment deposition downstream of sediment basin outfall was observed. Silt fencing is being undermined at the low areas on site. (Figs. 3, 5, 8, &amp; 10). <strong>Recommended Corrective Action:</strong> Ensure that downstream properties are protected from erosion and sediment as required by the approved erosion and sediment control plan and Minimum Standard 19. Maintain Silt Fence and Sediment Basins as required to ensure that they are in effective operating condition as required by the approved erosion and sediment control plan, manufacturers specifications, good engineering practices and the construction general permit.</td>
<td></td>
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</tbody>
</table>

1 Refers to applicable regulation found in the most recent publication of the State Water Control Law (Va. Code § 62.1-44.2 et seq.), Virginia Erosion and Sediment Control Regulations (9VAC25-840), the Virginia Stormwater Management Program (VSMP) Regulations (9VAC25-870), or the General Permit for Discharges of Stormwater from Construction Activities (9VAC25-880).
Comments:

Perimeter silt fencing has been added since the previous inspection report- there are areas that still need perimeter controls.

Sediment Basin 1 is currently in the process of being re-installed; the outlet structure appears to be leaking and the orifice appears to be clogged with sediment. Sediment has accumulated at the outfall. These items need to be addressed in conjunction with the maintenance of sediment basin 1.

Verbal confirmation that the outstanding issues at Sediment Basin 2 will be addressed at the completion of Sediment Basin 1. Both Diversions are to be installed at the completion of each basin.

**Recommended Corrective Action Deadline:** 05/13/2019

**Targeted Re-Inspection Date:** TBD

The recommended corrective action deadline date applies to all conditions noted on this report unless otherwise noted. If listed condition(s) currently constitute non-compliance and/or corrective actions are not completed by the deadline, other enforcement actions may be issued to the entity responsible for ensuring compliance on the above project.

Inspector Signature: ___________________________ Date: 05/16/2019
CONSTRUCTION GENERAL PERMIT SITE INSPECTION PHOTO LOG

Project Name: WM Landfill Borrow Area  Permit Number: VAR100808  Date: 04/29/2019

Fig. 1
Description: Sediment Basin 1 undergoing maintenance - estimated 2 weeks until completion.

Fig. 2
Description: Sediment Basin 1’s riser structure has a gap between the structure and the pipe that appears to be causing a leak.

Fig. 3
Description: Sediment deposition at the outfall of Sediment Basin 1.

Fig. 4
Description: Sediment Basin 2 is heavily eroded - no items from the previous inspection have been addressed. To be addressed after Sediment Basin 1 has been completed.
CONSTRUCTION GENERAL PERMIT SITE INSPECTION PHOTO LOG

Project Name: WM Landfill Borrow Area    Permit Number: VAR100808    Date: 04/29/2019

Fig. 5
Description: The outfall for Sediment Basin 2 shows slightly discolored water discharging into creek. Strong odor present.

Fig. 6
Description: Contractor on site removed sediment from the embankment of Sediment Basin 2.

Fig. 7
Description: Large denuded area with minor undermining of the silt fence at the low point. One of 3 SF repairs needed.

Fig. 8
Description: Down slope of silt fence shown in Figure 7.
CONSTRUCTION GENERAL PERMIT SITE INSPECTION PHOTO LOG

Project Name: WM Landfill Borrow Area  Permit Number: VAR100808  Date: 4/29/2019

Fig. 9
Description: Large denuded area without perimeter controls - has been dormant for over one year with no stabilization.

Fig. 10
Description: Sediment eroding off site due to lack of perimeter controls.

Fig. 11
Description: Sediment eroding upslope of Figure 10.

Fig. 12
Description: Erosion beginning where silt fencing has been added since the previous inspection; recommended stabilization.
<table>
<thead>
<tr>
<th>Impact ID</th>
<th>Water ID</th>
<th>Waterbody</th>
<th>Impact Type</th>
<th>Estimated Mean Sediment Depth (inch)</th>
<th>Approximate Acreage of Impact</th>
<th>Approximate Linear Foot of Impact</th>
<th>Sediment Removal Y/N and Type</th>
<th>Site Stability/BMP</th>
<th>DEQ Corrective Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>EA</td>
<td>Ephemeral stream</td>
<td>Sediment</td>
<td>0.5</td>
<td>NA</td>
<td>20</td>
<td>N. DEQ approved</td>
<td>Seed and mulch upslope silt fence edge bare ground</td>
<td>Do not place mulch within surface waters (ie. wetlands and stream channels). No seeding required.</td>
</tr>
<tr>
<td>2</td>
<td>PA</td>
<td>Perennial stream</td>
<td>Sediment</td>
<td>5</td>
<td>NA</td>
<td>250</td>
<td>Y manual</td>
<td>Replace silt fence along southern perimeter road</td>
<td>Remove sediment using manual removal methods. No seeding required.</td>
</tr>
<tr>
<td>3</td>
<td>IA</td>
<td>Intermittent stream</td>
<td>Sediment</td>
<td>4</td>
<td>NA</td>
<td>81</td>
<td>Y manual</td>
<td>Replace silt fence along southern perimeter road</td>
<td>Remove sediment using manual removal methods. No seeding required.</td>
</tr>
<tr>
<td>4</td>
<td>WSS</td>
<td>PFO</td>
<td>Sediment</td>
<td>6</td>
<td>0.04</td>
<td>NA</td>
<td>N. Please remove sediment in this area</td>
<td>Replace silt fence along southern perimeter road</td>
<td>Remove sediment using manual removal methods. Reseed with a DEQ-approved wetland seed mix comprised of plant species native to the Coastal Plain.</td>
</tr>
<tr>
<td>7</td>
<td>WNE</td>
<td>PFO</td>
<td>Grubbed</td>
<td>NA</td>
<td>0.07</td>
<td>NA</td>
<td>N. Please restore this area.</td>
<td>Install silt fence to protect undisturbed adjacent wetlands</td>
<td>Restore and replant with woody stems.</td>
</tr>
<tr>
<td>Impact ID</td>
<td>Water ID</td>
<td>Waterbody</td>
<td>Impact Type</td>
<td>Estimated Mean Sediment Depth (inch)</td>
<td>Approximate Acreage of Impact</td>
<td>Approximate Linear Foot of Impact</td>
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<td>Site Stability/BMP</td>
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</tr>
<tr>
<td>8</td>
<td>WNE</td>
<td>PFO</td>
<td>Sediment</td>
<td>0.1</td>
<td>0.56</td>
<td>NA</td>
<td>N. DEQ approved</td>
<td>This area will be inspected and appropriate BMPs will be installed to limit ruff off from inside of silt fence. BMPs may include riprap, ECC reinforcement matting, and seeding and mulching.</td>
<td>Reseed with a DEQ-approved wetland seed mix comprised of plant species native to the Coastal Plain. Do not place mulch or ECC matting within surface waters (ie. wetlands and stream channels).</td>
</tr>
<tr>
<td>9</td>
<td>WNE</td>
<td>PFO</td>
<td>Sediment</td>
<td>18</td>
<td>0.07</td>
<td>NA</td>
<td>N. Please remove sediment in this area.</td>
<td>This area will be inspected and appropriate BMPs will be installed to limit ruff off from inside of silt fence. BMPs may include riprap, ECC reinforcement matting, and seeding and mulching.</td>
<td>Remove sediment using manual removal methods. Reseed with a DEQ-approved wetland seed mix comprised of plant species native to the Coastal Plain. Do not place mulch or ECC matting within surface waters (ie. wetlands and stream channels).</td>
</tr>
<tr>
<td>11</td>
<td>WNW</td>
<td>PFO, PSS</td>
<td>Sediment</td>
<td>12</td>
<td>0.23</td>
<td>NA</td>
<td>N. Please remove sediment in this area.</td>
<td>This area will be inspected and appropriate BMPs will be installed to limit ruff off from inside of silt fence. BMPs may include riprap, ECC reinforcement matting, and seeding and mulching.</td>
<td>Remove sediment using manual removal methods. Reseed with a DEQ-approved wetland seed mix comprised of plant species native to the Coastal Plain. Do not place mulch within surface waters (ie. wetlands and stream channels).</td>
</tr>
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<td>Impact ID</td>
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<td>DEQ Corrective Action</td>
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<tr>
<td>12</td>
<td>Bradley Run tributary</td>
<td>Perennial stream</td>
<td>Sediment</td>
<td>2</td>
<td>NA</td>
<td>26</td>
<td>N. DEQ approved</td>
<td>WM is redesigning the sediment basin to have two forebays to reduce turbid water output</td>
<td>seeding and mulching. or ECC matting within surface waters (ie. wetlands and stream channels). No additional action.</td>
</tr>
<tr>
<td>13</td>
<td>Bradley Run tributary wetland</td>
<td>PFO</td>
<td>Sediment</td>
<td>9</td>
<td>0.02</td>
<td>NA</td>
<td>Y manual</td>
<td>Install silt fencing above the Basin 3 outfall area</td>
<td>Install silt fencing above the Basin 3 outfall area Remove sediment using manual removal methods. Reseed with a DEQ-approved wetland seed mix comprised of plant species native to the Coastal Plain.</td>
</tr>
<tr>
<td>14</td>
<td>Bradley Run tributary wetland</td>
<td>PFO</td>
<td>Sediment</td>
<td>0.5</td>
<td>0.03</td>
<td>NA</td>
<td>N. DEQ approved</td>
<td>Install silt fencing above the Basin 3 outfall area</td>
<td>Reseed with a DEQ-approved wetland seed mix comprised of plant species native to the Coastal Plain.</td>
</tr>
<tr>
<td>15</td>
<td>Bradley Run tributary wetland</td>
<td>PEM</td>
<td>Sediment</td>
<td>1</td>
<td>0.01</td>
<td>NA</td>
<td>N. DEQ approved</td>
<td>Install silt fencing above the Basin 3 outfall area</td>
<td>Reseed with a DEQ-approved wetland seed mix comprised of plant species native to the Coastal Plain.</td>
</tr>
<tr>
<td>Impact ID</td>
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<td>Waterbody</td>
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<tr>
<td>16</td>
<td>Bradley Run tributary wetland</td>
<td>PFO</td>
<td>Sediment</td>
<td>8</td>
<td>0.27</td>
<td>NA</td>
<td>Y manual</td>
<td>Restore the functionality of the western borrow basin, seed and stabilize the basin banks, and maintain the basin in working order</td>
<td>Remove sediment using manual removal methods. Reseed with a DEQ-approved wetland seed mix comprised of plant species native to the Coastal Plain.</td>
</tr>
<tr>
<td>17</td>
<td>Bradley Run tributary wetland</td>
<td>PFO</td>
<td>Sediment</td>
<td>2</td>
<td>0.11</td>
<td>NA</td>
<td>N. DEQ approved</td>
<td>Restore the functionality of the western borrow basin, seed and stabilize the basin banks, and maintain the basin in working order</td>
<td>Reseed with a DEQ-approved wetland seed mix comprised of plant species native to the Coastal Plain.</td>
</tr>
<tr>
<td>18</td>
<td>Bradley Run tributary wetland</td>
<td>PFO</td>
<td>Sediment</td>
<td>0.5</td>
<td>0.08</td>
<td>NA</td>
<td>N. DEQ approved</td>
<td>Restore the functionality of the western borrow basin, seed and stabilize the basin banks, and maintain the basin in working order</td>
<td>Reseed with a DEQ-approved wetland seed mix comprised of plant species native to the Coastal Plain.</td>
</tr>
<tr>
<td>19</td>
<td>Bradley Run tributary wetland</td>
<td>PFO</td>
<td>Sediment</td>
<td>0.5</td>
<td>0.05</td>
<td>NA</td>
<td>N. DEQ approved</td>
<td>Restore the functionality of the western borrow basin, seed and stabilize the basin banks, and maintain the basin in working order</td>
<td>Reseed with a DEQ-approved wetland seed mix comprised of plant species native to the Coastal Plain.</td>
</tr>
<tr>
<td>Impact ID</td>
<td>Water ID</td>
<td>Waterbody</td>
<td>Impact Type</td>
<td>Estimated Mean Sediment Depth (inch)</td>
<td>Approximate Acreage of Impact</td>
<td>Approximate Linear Foot of Impact</td>
<td>Sediment Removal Y/N and Type</td>
<td>Site Stability/BMP</td>
<td>DEQ Corrective Action</td>
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</tr>
<tr>
<td>20</td>
<td>Bradley Run tributary</td>
<td>Perennial stream</td>
<td>Sediment</td>
<td>6</td>
<td>727</td>
<td>Y manualWM</td>
<td>will restore the functionality of the western borrow basin, seed and stabilize the basin banks, and maintain the basin in working order</td>
<td>Remove sediment using manual removal methods. Reseed with a DEQ-approved wetland seed mix comprised of plant species native to the Coastal Plain.</td>
<td></td>
</tr>
<tr>
<td>21</td>
<td>Beaver Pond</td>
<td>PFO</td>
<td>Sediment</td>
<td>10</td>
<td>0.95</td>
<td>NA</td>
<td>Y mechanical</td>
<td>WM will restore the functionality of the eastern borrow basin, seed and stabilize the basin banks, and maintain the basin in working order</td>
<td>Subject to approval. Prepare proposal for the use of mechanized equipment. Include figures with staging area, ingress and egress routes. Restoration of all surface waters.</td>
</tr>
<tr>
<td>22</td>
<td>Beaver Pond</td>
<td>PSS</td>
<td>Sediment</td>
<td>0.5</td>
<td>0.01</td>
<td>NA</td>
<td>N. DEQ approved</td>
<td>WM will install silt fencing between this wetland and the adjacent road</td>
<td>Reseed with a DEQ-approved wetland seed mix comprised of plant species native to the Coastal Plain.</td>
</tr>
<tr>
<td>23</td>
<td>Beaver Pond</td>
<td>PSS</td>
<td>Sediment</td>
<td>0.1</td>
<td>0.11</td>
<td>NA</td>
<td>N. DEQ approved</td>
<td>WM will restore the functionality of the eastern borrow basin, seed and stabilize the basin banks, and maintain the basin in working order</td>
<td>Reseed with a DEQ-approved wetland seed mix comprised of plant species native to the Coastal Plain.</td>
</tr>
<tr>
<td>Impact ID</td>
<td>Water ID</td>
<td>Waterbody</td>
<td>Impact Type</td>
<td>Estimated Mean Sediment Depth (inch)</td>
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<tr>
<td>24</td>
<td>Bradley Run tributary wetland</td>
<td>PFO</td>
<td>Sediment</td>
<td>4</td>
<td>0.36</td>
<td>NA</td>
<td>Y Manual</td>
<td>WM will inspect the erosion sources to determine the best long-term protective, stabilizing measures (e.g., ECC matting, riprap)</td>
<td>Remove sediment using manual removal methods. Reseed with a DEQ-approved wetland seed mix comprised of plant species native to the Coastal Plain. Do not place mulch or ECC matting within surface waters (i.e., wetlands and stream channels).</td>
</tr>
<tr>
<td>25</td>
<td>Bradley Run tributary wetland</td>
<td>PFO</td>
<td>Sediment</td>
<td>1</td>
<td>0.04</td>
<td>NA</td>
<td>N. DEQ approved</td>
<td>WM will inspect the erosion sources to determine the best long-term protective, stabilizing measures (e.g., ECC matting, riprap)</td>
<td>Reseed with a DEQ-approved wetland seed mix comprised of plant species native to the Coastal Plain. Do not place mulch or ECC matting within surface waters (i.e., wetlands and stream channels).</td>
</tr>
<tr>
<td>26</td>
<td>Bradley Run tributary</td>
<td>Perennial stream</td>
<td>Sediment</td>
<td>3</td>
<td>NA</td>
<td>50</td>
<td>Y Manual</td>
<td>WM will inspect the erosion sources to determine the best long-term protective, stabilizing</td>
<td>Remove sediment using manual removal methods. No seeding required. Do not place mulch or ECC matting within</td>
</tr>
<tr>
<td>Impact ID</td>
<td>Waterbody</td>
<td>Waterbody Type</td>
<td>Estimated Mean Sediment Depth (inch)</td>
<td>Approximate Acreage of Impact</td>
<td>Approximate Linear Foot of Impact</td>
<td>Sediment Removal Y/N and Type</td>
<td>Site Stability/BMP</td>
<td>DEQ Corrective Action</td>
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<tr>
<td>27</td>
<td>Bradley Run tributary wetland</td>
<td>PFO Sediment</td>
<td>1</td>
<td>0.004</td>
<td>NA</td>
<td>N. DEQ approved</td>
<td>WM will inspect the erosion sources to determine the best long-term protective, stabilizing measures (e.g., ECC matting, riprap)</td>
<td>Reseed with a DEQ-approved wetland seed mix comprised of plant species native to the Coastal Plain. Do not place mulch or ECC matting within surface waters (ie. wetlands and stream channels).</td>
<td></td>
</tr>
<tr>
<td>28</td>
<td>Bradley Run tributary wetland</td>
<td>PFO Sediment</td>
<td>0.5</td>
<td>0.01</td>
<td>NA</td>
<td>N. DEQ approved</td>
<td>WM will inspect the erosion sources to determine the best long-term protective, stabilizing measures (e.g., ECC matting, riprap)</td>
<td>Reseed with a DEQ-approved wetland seed mix comprised of plant species native to the Coastal Plain. Do not place mulch or ECC matting within surface waters (ie. wetlands and stream channels).</td>
<td></td>
</tr>
<tr>
<td>29</td>
<td>Bradley Run tributary wetland</td>
<td>PFO Sediment</td>
<td>1</td>
<td>0.03</td>
<td>NA</td>
<td>N. DEQ approved</td>
<td>WM will inspect the erosion sources to determine the best long-term protective, stabilizing measures (e.g., ECC matting, riprap)</td>
<td>Reseed with a DEQ-approved wetland seed mix comprised of plant species native to the Coastal Plain. Do not place mulch or ECC matting within surface waters (ie. wetlands and stream channels).</td>
<td></td>
</tr>
<tr>
<td>Impact ID</td>
<td>Water ID</td>
<td>Waterbody</td>
<td>Impact Type</td>
<td>Estimated Mean Sediment Depth (inch)</td>
<td>Approximate Acreage of Impact</td>
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<tr>
<td></td>
<td></td>
<td>Bradley Run tributary wetland</td>
<td>30</td>
<td>8</td>
<td>0.14</td>
<td>NA</td>
<td>Y manual</td>
<td>Install silt fencing along the edge of the borrow pit in this area</td>
<td>ECC matting, riprap)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Bradley Run</td>
<td>31</td>
<td>4</td>
<td>NA</td>
<td>60</td>
<td>Y manual</td>
<td>WM will inspect the erosion sources to determine the best long-term protective, stabilizing measures (e.g., ECC matting, riprap)</td>
<td>Remove sediment using manual removal methods. No seeding required. Do not place mulch or ECC matting within surface waters (ie. wetlands and stream channels).</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td></td>
<td></td>
<td>3.2 acres</td>
<td>1,214 linear feet</td>
<td></td>
<td></td>
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</tbody>
</table>