



EEE Consulting, Inc.

Environmental, Engineering and Educational Solutions

SCANNED

AUG 14 2013

6142

August 7, 2013

Ms. Michelle R. Hollis
UECA Coordinator
Virginia Department of Environmental Quality
629 East Main Street
Richmond, VA 23218

Re: USA Waste of Virginia Landfills, Inc., Environmental Covenant (UECA)
Wheelabrator Corporation Landfill, Bedford, Virginia
EPA I.D.# VAD 000 063 669

Dear Ms. Hollis,

EEE Consulting, Inc. on behalf of USA Waste of Virginia Landfills, Incorporated (the Owner) is submitting a file-stamped copy of the UECA for the Wheelabrator Corporation Landfill in Bedford, VA. The UECA was filed with the Bedford County Circuit Court on August 7, 2013 and a file stamped copy of the UECA was submitted to the Bedford County Administrator (see attached letter).

If you have any questions on this submittal please contact either Mark DeVine (noted below), or me at (804) 442-3330, ext 207, or email sharless@eee-consulting.com

Mr. Mark DeVine
District Manager
USA Waste of Virginia Landfills, Inc.
4 Liberty Lane West
Hampton, NH 03842
(603) 929-5436

Sincerely,

Sharon Ward Harless
EEE Consulting, Inc.

C: Mark P. Devine, USA Waste of Virginia Landfills, Inc. (Waste Management)

Enclosure: File-stamped copy of UECA and Receipt of Filing with Bedford County
Copy of letter to Bedford County Administrator



OFFICIAL RECEIPT
BEDFORD COUNTY CIRCUIT COURT
123 EAST MAIN ST. SUITE 201
BEDFORD, VA 24523
540-586-7632

DEED RECEIPT

DATE: 08/07/13 TIME: 10:04:38 ACCOUNT: 019CLR130009000 RECEIPT: 13000018290
CASHIER: CMM REG: BB69 TYPE: OTHER PAYMENT: FULL PAYMENT
INSTRUMENT : 130009000 BOOK: PAGE: RECORDED: 08/07/13 AT 10:04
GRANTOR: USA WASTE OF VIRGINIA LANDFILLS INC EX: N LOC: CO
GRANTEE: USA WASTE OF VIRGINIA LANDFILLS INC EX: N PCT: 100%
AND ADDRESS : , .
RECEIVED OF : CK 982/CASH
CHECK: \$21.00 EEE 982 CASH: \$20.00
DESCRIPTION 1: UECA ENVIRONMENTAL COVENANT PAGES: 30 OP 0
2: NAMES: 0
CONSIDERATION: .00 A/VAL: .00 MAP: 109A45A
PIN:
301 DEEDS 28.50 145 VSLF 1.50
106 TECHNOLOGY TRST FND 5.00
TENDERED : 41.00
AMOUNT PAID: 35.00
CHANGE AMT : 6.00

CLERK OF COURT: CATHY C. HOGAN

PAYOR'S COPY
RECEIPT COPY 1 OF 2



EEE Consulting, Inc.

Environmental, Engineering and Educational Solutions

August 7, 2013

Mr. Mark K. Reeter
Bedford County Administrator
Administration
122 East Main Street, Suite 202
Bedford, VA 24523

Re: USA Waste of Virginia Landfills, Inc., Environmental Covenant (UECA)
Wheelabrator Corporation Landfill, Bedford, Virginia
EPA I.D.# VAD 000 063 669

Dear Mr. Reeter,

EEE Consulting, Inc. on behalf of USA Waste of Virginia Landfills, Incorporated (the Owner) is submitting a file-stamped copy of the UECA for the Wheelabrator Corporation Landfill in Bedford, VA. The UECA was filed with the Bedford County Circuit Court on August 7, 2013. The UECA is being submitted to you at the request of the Virginia Department of Environmental Quality. If you have questions concerning the UECA please contact one of the following:

Mr. Mark DeVine District Manager USA Waste of Virginia Landfills, Inc. 4 Liberty Lane West Hampton, NH 03842 (603) 929-5436	Ms. Michelle R. Hollis UECA Coordinator Virginia Department of Environmental Quality 629 East Main Street Richmond, VA 23218 (804) 698-4014
--	--

If you have any questions on this submittal please contact either Mark DeVine (noted above), or me at (804) 442-3330, ext 207, or email sharless@eee-consulting.com

Sincerely,

Sharon Ward Harless
EEE Consulting, Inc.

C: Mark P. Devine, USA Waste of Virginia Landfills, Inc. (Waste Management)
Michelle R. Hollis, Virginia DEQ

Enclosure: File-stamped copy of UECA and Receipt of Filing with Bedford County

Tax Map or GPIN No.: Parcel RPC # 10904401

Prepared by: Mark P. DeVine, District Manager

Remediation Program Site ID #: VAD000063669

UECA ENVIRONMENTAL COVENANT

This environmental covenant is made and entered into as of the 4th day of June, 2013, by and between USA WASTE OF VIRGINIA LANDFILLS, INC, a Delaware corporation, having a mailing address of 4 Liberty Lane West, Hampton, NH 03842 (hereinafter referred to as the "Grantor" or "Owner"), and USA WASTE OF VIRGINIA LANDFILLS, INC. (Hereinafter referred to as the "Grantee" or "Holder") to be indexed as Grantor and Grantee.

The Virginia Department of Environmental Quality (VDEQ) whose address is 629 East Main Street, Richmond VA 23219 (hereinafter referred to as the "Agency") also joins in this environmental covenant.

This environmental covenant is executed pursuant to the Virginia Uniform Environmental Covenants Act, § 10.1-1238 et seq. of the Code of Virginia (UECA). This environmental covenant subjects the Property identified in Paragraph 1 to the activity and use limitations in this document.

1. Property affected.

The property affected (Property) by this environmental covenant is located at 3 Abrasive Avenue, Bedford, Virginia, 24523 and is further described as follows:

Parcel RPC # 10904401

Map Number: 109 A 45A

Legal Description: N&W RWY PB27/364

Document Number 030012294

Acres: 12.626 as shown on the "Resurvey of 12.626 acres property of Wheelabrator Corporation, dated October 6, 1992, prepared by Shrader Engineering and Land Surveying, Inc., recorded in Deed Book 867, page 355. (Exhibit 1).

2. Description of Contamination & Remedy.

a. The Administrative Record is maintained by the Virginia Department of Environmental Quality, 629 East Main Street, Richmond VA 23219. A full description of the contamination at the Property and VDEQ's final remedy for the Property, including the July 12, 2010 Statement of Basis, are set forth in that record. The Statement of Basis is attached as Exhibit 2

b. The Property has a 2.7 acre landfill that was used for the disposal of furnace dust and furnace slag generated from secondary steel smelting operations conducted at the adjacent Wheelabrator Abrasives foundry. The foundry, located to the south of the landfill, melted scrap metal in an electric furnace to produce steel "shot". Furnace dust and furnace slag was disposed of in the landfill until 1985. Cadmium, chromium, and lead were present in the dust and slag above regulatory levels causing the waste material to be classified as characteristically hazardous. In addition, melted heat treating operations utilized cyanides and generated quenched waste-water sludges that were discharged into the landfill. The landfill, which operated for 16 years, was closed with waste in place on December 21, 1988. The VDEQ issued a Hazardous Waste Management Post-Closure Permit (Permit) on September 29, 1992. The Permit was renewed August 16, 2003 with an expiration date of August 15, 2013. The Permit

required groundwater monitoring upgradient and downgradient of the closed landfill as well as maintenance of the landfill cap. The Permit established groundwater protection standards for the following constituents of concern: antimony, arsenic, barium, beryllium, cadmium, chromium, lead, mercury, nickel, silver, sulfide, thallium, tin, vanadium, zinc, acetophenone, and cyanide. A review of the groundwater monitoring data from 2001 through 2012 indicated the buried waste in the closed Landfill is secure, and there is no sustained exceedance of groundwater protection standards or impacts from the landfill. A Class 3 permit modification was submitted to VDEQ on March 1, 2013 requesting a reduction in the post closure period and termination of the post closure permit.

The Property also has two former Solid Waste Management Units (SWMUs); Pond #2 and Pond #3. Both ponds were built to manage contact cooling water discharged from the Wheelabrator Abrasives foundry. The constituents of concern in the Ponds were low levels of heavy metals. Pond 2 was closed in 1992 under a Virginia Pollution Abatement permit, and Pond 3 was closed in 1988 in accordance with a state waste program closure plan as a non-hazardous waste unit. Both units were closed by removing all the water and sediment in the Ponds and then backfilling and seeding with vegetative cover. On September 22, 2010, the VDEQ approved the Class 2 permit modification to support the determination of No Further Action for Pond #2 and Pond #3.

3. Activity & Use Limitations.

a. The property within the landfill boundary is subject to the following activity and use limitations, which shall run with the land and become binding on Grantor(s) and any successors, assigns, tenants, agents, employees, and other persons under its (their) control, until such time as this covenant may terminate as provided by law:

- The property within the landfill boundary cannot be developed in any way which could minimize the integrity and effectiveness of the landfill cover.
- Maintain the integrity and effectiveness of the landfill cover, including making repairs to the cap, as necessary, to correct the effects of settling, subsidence, erosion, or any activity that may potentially compromise the landfill cover.
- Prevent run-on and run-off from eroding or otherwise damaging the landfill cover.
- Maintain the security fence and signage around the closed landfill to prevent unauthorized and unknowing entry of persons or livestock.

b. Geographic coordinates defining the boundary of the Property and the landfill are attached as Exhibit 3.

4. Notice of Limitations in Future Conveyances.

Each instrument hereafter conveying any interest in the Property subject to this environmental covenant shall contain a notice of the activity and use limitations set forth in this environmental covenant and shall provide the recorded location of this environmental covenant.

5. Compliance and Use Reporting.

a. By the one year anniversary of the execution of this environmental covenant and annually thereafter, and whenever else requested in writing by the Agency, the then current owner of the Property shall submit, to the Agency and any Holder listed in the Acknowledgements below, written documentation stating whether or not the activity and use limitations in Section 3 of this environmental covenant are being observed. This

documentation will be signed by a qualified and certified professional engineer who has inspected and investigated compliance with this environmental covenant.

b. In addition, within one (1) month after any of the following events, the then current owner of the Property shall submit, to the Agency and any Holder listed in the Acknowledgments below, written documentation describing the following: noncompliance with the activity and use limitations in this environmental covenant; transfer of the Property; changes in use of the Property; or filing of applications for building permits for the Property and any proposals for any site work, if such building or proposed site work will affect the landfill on the Property subject to this environmental covenant.

6. Access by the Holder(s) and the Agency.

In addition to any rights already possessed by the Holder and the Agency, this environmental covenant grants to the Holder and the Agency a right of reasonable access to the Property in connection with implementation, inspection, or enforcement of this environmental covenant.

7. Subordination

Based upon a title review there are no encumbrances on the Property. A title review is attached as Exhibit 4.

8. Recording & Proof & Notification.

a. Within ninety (90) calendar days after the date of the Agency's approval of this UECA environmental covenant, the Grantor shall record, or cause to be recorded, this

environmental covenant with the Clerk of the Circuit Court for each locality wherein the Property is located. The Grantor shall likewise record, or cause to be recorded, any amendment, assignment, or termination of this UECA environmental covenant with the applicable Clerk(s) of the Circuit Court within ninety (90) days of their execution. Any UECA environmental covenant, amendment, assignment, or termination recorded outside of these periods shall be invalid and of no force and effect.

b. The Grantor shall send a file-stamped copy of this environmental covenant, and of any amendment, assignment, or termination, to the Holder(s) and the Agency within sixty (60) days of recording. Within that time period, the Grantor also shall send a file-stamped copy to the chief administrative officer of each locality in which the Property is located, any persons who are in possession of the Property who are not the Grantors, any signatories to this covenant not previously mentioned, and any other parties to whom notice is required pursuant to the Uniform Environmental Covenants Act.

9. Termination or Amendment.

This environmental covenant is perpetual and runs with the land unless terminated or amended (including assignment) in accordance with UECA

10. Enforcement of environmental covenant.

This environmental covenant shall be enforced in accordance with § 10.1-1247 of the Code of Virginia.

ACKNOWLEDGMENTS:

GRANTOR & HOLDER

USA WASTE OF VIRGINIA LANDFILLS,
INC.

Date

By (signature):

Brendan Sheehan

Name (printed):

Brendan Sheehan

Title:

Director of Real Estate

STATE of Illinois

CITY of Lombard

On this 4TH day of June, 2013 before me, the undersigned officer,
personally appeared Brendan Sheehan who acknowledged himself to be the person
whose name is subscribed to this environmental covenant, and acknowledged that he
freely executed the same for the purposes therein contained.

In witness whereof, I hereunto set my hand and official seal.

My commission expires:

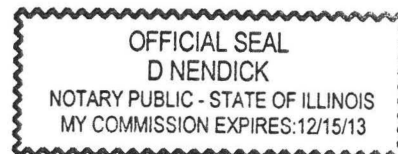
Dec. 15, 2013

Registration #:

724996

D. Nendick

Notary Public



AGENCY

APPROVED by the Virginia Department of Environmental Quality as required by § 10.1-1238 et seq. of the Code of Virginia.

Date 6-11-2013

By (signature):

Name (printed):

Title:

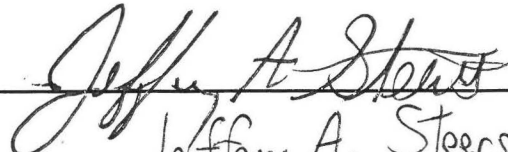
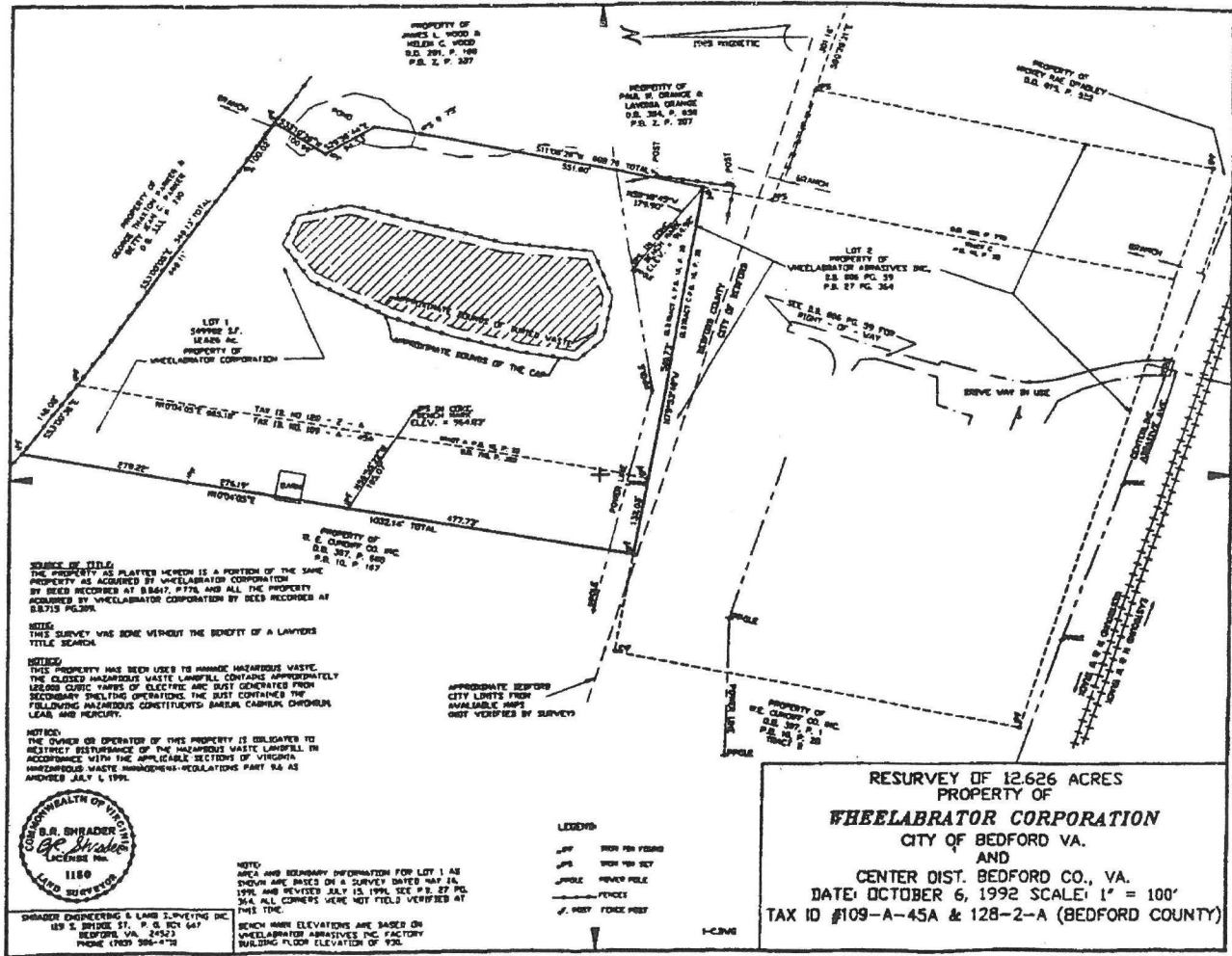

Jeffery A. Steers
Division Director

Exhibit 1

Resurvey of 12.626 acres Property of Wheelabrator Corporation

BOOK 867 PAGE 355



VSLF 145 1.00

State Tax 038
 County Tax 213
 City Tax 214
 Co. Thrift 212
 City Thrift 222
 Clerk's Fee 301
 State Tax 038
 County Tax 220
 City Tax 223
 Postage 350
 Total 1300

VIRGINIA: In the Clerk's Office of the
 Circuit Court of Bedford County, Va.
 10-22-1992 this writing with
 plat annexed
 has admitted to record a 12.626 chd.
 1/4, and the tax imposed by Section
 58.1-802 of the Code in the amount of
 \$ has been paid.

TESTE: CAROL W. BLANK, CLERK

By *[Signature]* Dep. Clerk

ON 867 PAGE 355

Weld 11-6-92

*Return to:
 (P. Miller)
 Robert T. Meloy
 The Wheelabrator Corporation
 3003 Rutledge Rd.
 Oak Brook, Illinois 60521*

Exhibit 2
July 2010 Statement of Basis



VIRGINIA DEPARTMENT OF ENVIRONMENT QUALITY

WASTE DIVISION

OFFICE OF REMEDIATION PROGRAMS

STATEMENT OF BASIS

WHEELABRATOR CORPORATION LANDFILL

BEDFORD, VIRGINIA

EPA ID NO. VAD000063669

JULY 12, 2010

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I. INTRODUCTION

A. Facility Name

The Virginia Department of Environmental Quality (VDEQ) has prepared this Statement of Basis (SB) for the Wheelabrator Corporation Landfill located at 3 Abrasive Avenue, Bedford, Virginia 24523 (hereinafter referred to as the Facility or Wheelabrator).

The Facility is subject to the Corrective Action Program under the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. Sections 6901 to 6992k. The Corrective Action Program is designed to ensure that certain facilities subject to RCRA have investigated and cleaned up any releases of hazardous waste and waste constituents that have occurred at their property.

Information on the Corrective Action Program can be found by navigating <http://www.epa.gov/reg3wcmd/correctiveaction.htm>.

VDEQ has prepared this SB in cooperation with the United States Environmental Protection Agency (EPA). VDEQ has reviewed all available Facility data and has determined that no additional characterization or remediation is necessary for the Facility to satisfy its federal RCRA Corrective Action obligations. Based on its review, in this SB VDEQ is proposing its final remedy for the Facility and providing the opportunity for public comment and review on its proposal and the associated permit modification.

B. Proposed Decision

This SB explains VDEQ's proposed decision that no further actions to remediate soil, groundwater, or indoor air contamination are necessary to protect human health and the environment given current and reasonably anticipated future land use. VDEQ's proposed decision requires the Facility to maintain certain property mechanisms known as Institutional Controls (ICs) and Engineering Controls (ECs). The proposed controls are discussed in Section IV below. VDEQ's proposed decision represents "Corrective Action Complete with Controls" as described in EPA's "Final Guidance on Completion of Corrective Action Activities at RCRA Facilities", (68 FR 8757, February 25, 2003). A Corrective Action Complete with Controls determination indicates that protection of human health and the environment has been achieved, and will continue as long as the necessary operation and maintenance actions are performed, and the institutional controls are maintained and complied with.

This SB summarizes information that can be found in greater detail in the work plans and reports reviewed by VDEQ and EPA, which can be found in the Administrative Record (AR).

C. Importance of Public Input

The purpose of this document is to solicit public comment on VDEQ's proposed remedy prior to VDEQ making its final remedy selection for the Facility. The public may participate in the remedy selection process by reviewing this SB and documents contained in the AR in support of VDEQ's proposed decision and submitting written comments to VDEQ during the public comment period. The information presented in this SB can be found in greater detail in the work plans and reports submitted by the Facility to VDEQ and EPA. To gain a more comprehensive understanding of the RCRA activities that have been conducted at the Facility, VDEQ encourages the public to review these documents, which are found in the AR. A copy of the AR is available for public review, in paper or electronic format, from the VDEQ contact person, the address and telephone number of which is provided in Section VII below.

When making a determination regarding the selection of a final remedy, VDEQ will consider all written comments received during the comment period (see Section VII), any oral or written statements received during the public meeting, and requirements of the Virginia Hazardous Waste Management Regulations and 40 CFR Part 124. Each person who has submitted comments will receive a written response from VDEQ. If VDEQ determines that new information or public comments warrant a modification to the proposed decision, VDEQ will modify the proposed decision or select other alternatives based on such new information and/or public comments. VDEQ is proposing to incorporate the remedy selection and determination of Corrective Action Complete with Controls in its modification of the Facility's Hazardous Waste Management Post-Closure Permit.

II. FACILITY BACKGROUND

The Wheelabrator Corporation Landfill is a 2.7 acre landfill located on approximately 13 acres of land approximately two miles northwest of the Town of Bedford, Bedford County, Virginia. An unnamed stream, a tributary to Little Otter River, is located along the eastern portion of the landfill site.

Wheelabrator, currently owned by USA Waste of Virginia Landfills, Inc., was used for the disposal of furnace dust and furnace slag generated from secondary steel smelting operations conducted at the adjacent Wheelabrator Abrasives foundry. The foundry, located to the south of the landfill, melted scrap metal in an electric furnace to produce steel "shot". Furnace dust and furnace slag was disposed of in the landfill until 1985. The landfill, which operated for 16 years, was closed with waste in place on December 21, 1988.

The VDEQ issued Wheelabrator a Hazardous Waste Management Post-Closure Permit (Permit) on September 29, 1992. The Permit was renewed on July 17, 2003, with an effective date of August 16, 2003. The Permit encompasses one Solid Waste Management Unit (SWMU), the closed landfill, and requires groundwater monitoring upgradient and downgradient of the closed landfill as well as maintenance of the landfill

cap. Two additional SWMUs – Pond #2 and Pond #3 - were identified during subsequent site assessment activities. On September 26, 2006, the VDEQ's review of the SWMU Release Assessment report indicated that there was enough data to support the determination of No Further Action for Pond #2 and Pond #3.

III. SUMMARY OF ENVIRONMENTAL HISTORY

To date, the following RCRA Corrective Action milestones have been completed at the Facility:

- The operational period for the Wheelabrator Landfill was from 1973 to 1985. The landfill was closed with waste in place on December 21, 1988.
- On June 28, 1989, the RCRA Facility Assessment (RFA) was completed.
- On December 1, 1991, the Facility was ranked as a "high" priority site according to the National Corrective Action Prioritization Schedule (NCAPS).
- On September 29, 1992, the initial Hazardous Waste Management Post-Closure Permit became effective until September 29, 2002. The above permit required the Facility to implement compliance monitoring.
- On September 17, 2004, the *Current Human Exposures Under Control* Environmental Indicator was met.
- On September 23, 2003, the *Migration of Contaminated Groundwater Under Control* Environmental Indicator was met.
- On July 17, 2003, the Hazardous Waste Management Post-Closure Permit was renewed with an effective date of August 16, 2003 and remains in effect until August 16, 2013.
- On April 20, 2004, the SWMU Release Assessment Report was submitted.
- On September 26, 2006, the VDEQ determined that no further action was required at Pond #2 and Pond #3.
- On September 29, 2008, the compliance period for the regulated unit ended and the Facility moved to a reduced groundwater monitoring program.

The release assessment at the Facility focused on two former ponds (Pond #2 and Pond #3) located on the Wheelabrator property which were built to manage contact cooling water discharged from the Wheelabrator Abrasives Plant. There was also a former Pond #1 associated with the Wheelabrator Abrasive Plant, however since Pond #1 is not part of the Wheelabrator property, it was not included in this investigation. It should be noted

that Pond #1 was closed in 1992 along with Pond #2 according to the Virginia Pollution Abatement permit, and Pond #3 was closed under the waste program closure plan as a non-hazardous waste unit in 1988. Soil and sediment samples were collected from both Pond #2 and Pond #3 prior to closure. Based on analytical results, Pond #2 and Pond #3 did not show any evidence of containing hazardous waste. VDEQ completed a review of the environmental investigations, which included the SWMU Release Assessment Report dated April 20, 2004, and determined that no further action was required for Pond #2 and Pond #3. The No Further Action determination for Pond #2 and Pond #3 was transmitted to the Facility by letter dated September 26, 2006.

Under the Permit, groundwater monitoring at the closed landfill is conducted for the following constituents: barium, chromium, lead, tin, vanadium, zinc, and sulfide. The groundwater monitoring network consists of six (6) sampling wells: one background well MW-1; three point of compliance (POC) wells MW-2C, 3A, and 4A; and two assessment wells MW-4C and 5. The network also includes five (5) gauging wells, MW-2A, 2B, 3B, 3C, and 4B, to be used to measure groundwater elevation. Groundwater monitoring is conducted on a semi-annual basis. At the downgradient wells, there have been no confirmed exceedances of applicable groundwater protection standards, which are included in the permit and are based on Maximum Contaminant Levels (MCLs) or Alternate Concentration Limits (ACLs) approved by VDEQ. During the most recent monitoring event (November 5, 2009), lead slightly exceeded its groundwater protection standard (GPS) (18.4 ug/L compared to 15 ug/L) in upgradient well MW-1. Occasional detections of lead in the upgradient well at similar concentrations have historically occurred in this well and were discussed in the 2007 Annual Groundwater Monitoring Report (February 08) following a detection of 19 ug/L in November 2007. Historical concentrations have ranged from 3 to 68 ug/L. There were no detections in 2008 or spring 2009. No sustained exceedance or increasing trend is present. Groundwater monitoring will continue in accordance with the Permit.

IV. INSTITUTIONAL AND ENGINEERING CONTROLS

Institutional Controls ("ICs") are generally non-engineered mechanisms such as administrative and/or legal controls that minimize the potential for human exposure to contamination and/or protect the integrity of a remedy. Engineering Controls ("ECs") are generally engineered mechanisms such as a landfill cap. At the Wheelabrator Facility, waste with hazardous constituents will remain at the Facility in the closed capped landfill, and maintenance of the land fill cap as well as groundwater monitoring will be required under the Facility's Permit.

A Deed Notice is already in place with the Bedford County Circuit Clerk's Office, Deed Book 844, Page 767-768, identifying the location of the Facility's closed landfill. To support the Notice, the Facility will be required to provide a coordinate survey as well as a metes and bounds survey of the closed landfill and the Facility boundary. Mapping the extent of use restriction for the landfill will allow for presentation in a publicly accessible mapping program such as Google Earth or Google Maps.

The Permit requiring maintenance of the landfill as well as groundwater monitoring during the post-closure care period will be modified to reflect the determination that corrective action is complete with controls. The permit also contains provisions for the reporting of any new SWMUs, AOCs or releases to ensure the continued protection of human health and the environment. If new SWMUs, AOCs or releases are discovered, additional measures may need to be implemented to control any impacts to human health and the environment.

V. ENVIRONMENTAL INDICATORS

Under the Government Performance and Results Act ("GPRA"), EPA has set national goals to address RCRA corrective action facilities. Under GPRA, EPA evaluates two key environmental clean-up indicators for each facility: (1) Current Human Exposures Under Control and (2) Migration of Contaminated Groundwater Under Control. The Facility met these indicators on November 26, 2001.

VI. FINANCIAL ASSURANCE

Since no further investigations or corrective actions are anticipated, financial assurance for corrective action is not required for the Facility. Financial assurance is provided under the Permit for ongoing operation and maintenance costs associated with the landfill cap and groundwater monitoring during the post-closure care period.

VII. PUBLIC PARTICIPATION

Interested persons are invited to comment on VDEQ's proposed decision. The public comment period will last sixty (60) calendar days from the date the notice is published in a local newspaper. Comments may be submitted by mail, fax, e-mail, or phone to Mr. Matthew M. Stepien at the address listed below.

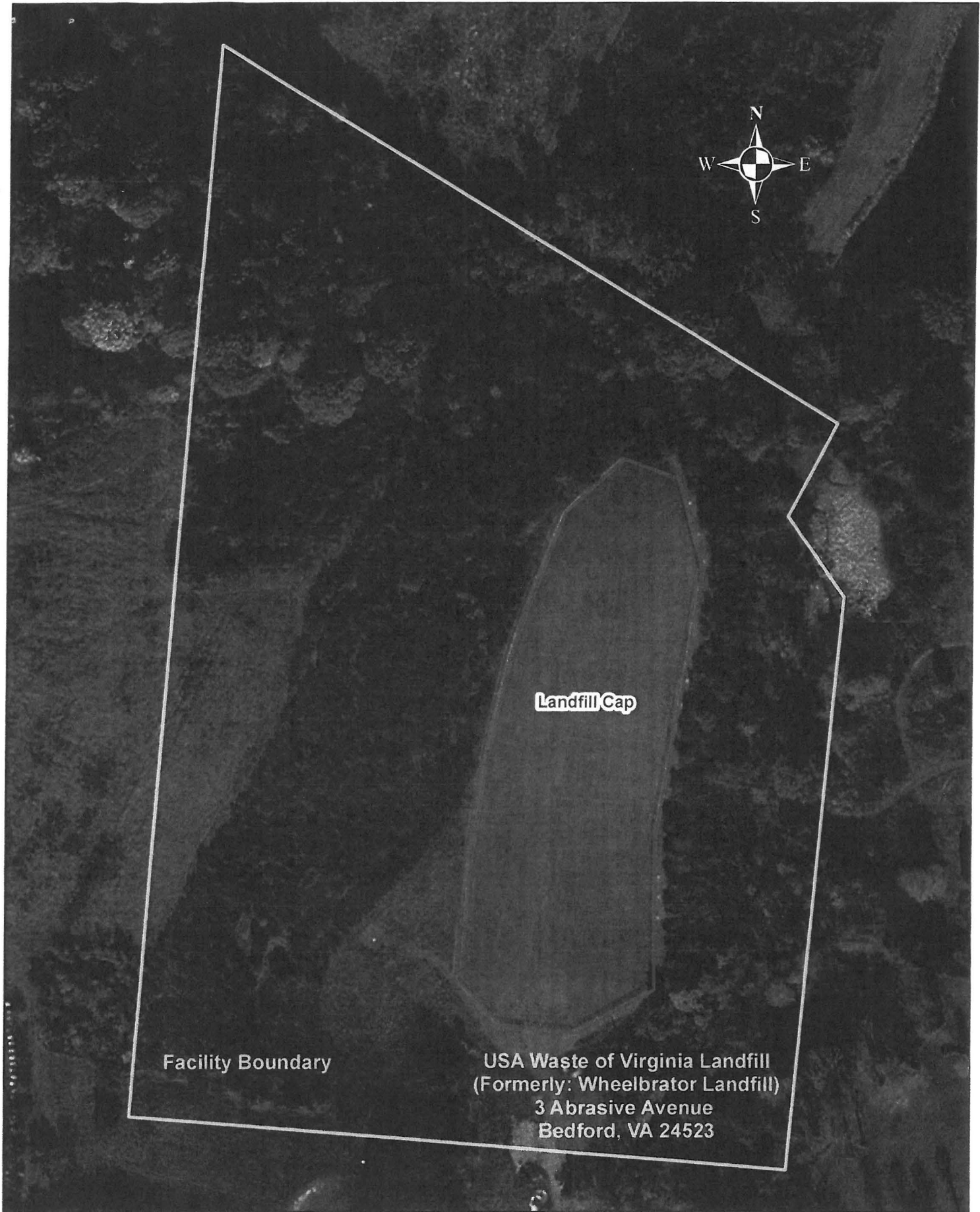
A public meeting will be held upon request fifteen (15) calendar days from the date the notice is published in a local newspaper. The Administrative Record contains all the information considered by VDEQ for its proposed remedy for the Facility. To receive a copy of the Administrative Record, contact Mr. Matthew M. Stepien at the address below:

Virginia Department of Environmental Quality
629 East Main Street
P.O. Box 1105
Richmond, VA 23218
Contact: Mr. Matthew M. Stepien
Phone: (804) 698 - 4026
Fax: (804) 698-4327
Email: matthew.stepien@deq.virginia.gov

Exhibit 3

GeospatialPDF_USAWasteofVA

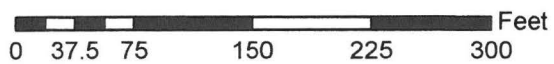
GIS Co-ordinate for Facilities with Institutional or Engineering Controls Report



Facility Boundary

Landfill Cap

USA Waste of Virginia Landfill
(Formerly: Wheelbrator Landfill)
3 Abrasive Avenue
Bedford, VA 24523



GIS Co-ordinate for Facilities with Institutional or Engineering Controls Report

Report Run on: 09-MAY-13

User Selection Criteria

EPA Region: None Chosen
State: None Chosen
City: None Chosen
Handler ID: VAD000063669
Handler Name: None Chosen
Area_Name: None Chosen

Results

Data meeting the criteria you selected above

Total Pages 4 Total Handler Count 1

Report Description

This report provides a list of co-ordinates for facilities with Corrective Action Institutional or Engineering

Report Information

Name: r3v5_gis_cacordrpt.rc
Developed By: Gabriel Patay, Region 3 LCD Tech Support
Deployed: June 2010
Contact: patay.gabriel@epa.gov
chun.susie@epa.gov
Tables Used: hreport_univ5, gis4, gis_lat_long4, aarea4, aaeven

GIS CA Facilities Coordinates Report

Report Run On: MAY-09-13 03:25 PM

VIRGINIA

USA WASTE OF VIRGINIA LANDFILLS, WHEELABRATOR LANDFILL

VAD000063669

BEDFORD

3 ABRASIVES AVENUE, BEDFORD, VA 24523

Area: ENTIRE FACILITY

CA Controls: EC

Notes: THE REQUIRED CONTROL IS A LANDFILL CAP AS SPECIFIED IN THE FACILITY'S POST-CLOSURE CARE PERMIT.

Gis Seq	Lat Long Seq	Longitude	Latitude
225	1	-79.554115	37.345118
225	2	-79.551944	37.344998
225	3	-79.551779	37.346507
225	4	-79.55197	37.346718
225	5	-79.551812	37.346965
225	6	-79.553433	37.347739
225	7	-79.553871	37.347947
225	8	-79.554115	37.345118

Area: ENTIRE FACILITY

CA Controls: IC

Notes: THE REQUIRED CONTROL IS A LANDFILL CAP AS SPECIFIED IN THE FACILITY'S POST-CLOSURE CARE PERMIT.

Gis Seq	Lat Long Seq	Longitude	Latitude
225	1	-79.554115	37.345118
225	2	-79.551944	37.344998
225	3	-79.551779	37.346507
225	4	-79.55197	37.346718
225	5	-79.551812	37.346965
225	6	-79.553433	37.347739
225	7	-79.553871	37.347947
225	8	-79.554115	37.345118

Area: ENTIRE FACILITY

CA Controls: EC

Notes: THE REQUIRED CONTROL IS A LANDFILL CAP AS SPECIFIED IN THE FACILITY'S POST-CLOSURE CARE PERMIT.

Gis Seq	Lat Long Seq	Longitude	Latitude
1	1	-79.552751	37.34543
235	1	-79.554115	37.345118
235	2	-79.551944	37.344998
235	3	-79.551779	37.346507
235	4	-79.55197	37.346718
235	5	-79.551812	37.346965
235	6	-79.553433	37.347739
235	7	-79.553871	37.347947
235	8	-79.554115	37.345118

Area: ENTIRE FACILITY

CA Controls: IC

Notes: THE REQUIRED CONTROL IS A LANDFILL CAP AS SPECIFIED IN THE FACILITY'S POST-CLOSURE CARE PERMIT.

Gis Seq	Lat Long Seq	Longitude	Latitude
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GIS CA Facilities Coordinates Report

Report Run On: MAY-09-13 03:25 PM

VIRGINIA

USA WASTE OF VIRGINIA LANDFILLS, WHEELABRATOR LANDFILL

VAD000063669

BEDFORD

Area: ENTIRE FACILITY

CA Controls: IC

Gis Seq	Lat Long Seq	Longitude	Latitude
1	1	-79.552751	37.34543
235	1	-79.554115	37.345118
235	2	-79.551944	37.344998
235	3	-79.551779	37.346507
235	4	-79.55197	37.346718
235	5	-79.551812	37.346965
235	6	-79.553433	37.347739
235	7	-79.553871	37.347947
235	8	-79.554115	37.345118

Area: POST CLOSURE LANDFILL

CA Controls: EC

Notes: THE REQUIRED CONTROL IS A LANDFILL CAP AS SPECIFIED IN THE FACILITY'S POST-CLOSURE CARE PERMIT.

Gis Seq	Lat Long Seq	Longitude	Latitude
223	1	-79.55239	37.345467
223	2	-79.55264	37.345351
223	3	-79.552891	37.34537
223	4	-79.553028	37.345478
223	5	-79.553009	37.345761
223	6	-79.552957	37.346054
223	7	-79.552881	37.346342
223	8	-79.552706	37.346723
223	9	-79.552516	37.346865
223	10	-79.552337	37.346814
223	11	-79.552249	37.34658
223	12	-79.552394	37.345871
223	13	-79.55239	37.345467

Area: POST CLOSURE LANDFILL

CA Controls: IC

Notes: THE REQUIRED CONTROL IS A LANDFILL CAP AS SPECIFIED IN THE FACILITY'S POST-CLOSURE CARE PERMIT.

Gis Seq	Lat Long Seq	Longitude	Latitude
223	1	-79.55239	37.345467
223	2	-79.55264	37.345351
223	3	-79.552891	37.34537
223	4	-79.553028	37.345478
223	5	-79.553009	37.345761
223	6	-79.552957	37.346054
223	7	-79.552881	37.346342
223	8	-79.552706	37.346723

GIS CA Facilities Coordinates Report

Report Run On: MAY-09-13 03:25 PM

VIRGINIA

USA WASTE OF VIRGINIA LANDFILLS, WHEELABRATOR LANDFILL

VAD000063669

BEDFORD

Area: POST CLOSURE LANDFILL CA Controls: IC

Gis Seq	Lat Long Seq	Longitude	Latitude
223	9	-79.552516	37.346865
223	10	-79.552337	37.346814
223	11	-79.552249	37.34658
223	12	-79.552394	37.345871
223	13	-79.55239	37.345467

State_Handler_Count 1

** END OF REPORT**

Report Handler Count

1

Exhibit 4
Title Search

TitleSearch.com

50 State Coverage · Serving the Real Estate Industry since 1995

PROPERTY AND OWNERSHIP INFORMATION

Owner's Name	USA WASTE OF VIRGINIA LANDFILLS, INC.	Order #	38273
Property Address	Parcel RPC# 10904401 Bedford, VA	Completed Date	3/27/2013
City/State	BEDFORD, VA	Effective Date	3/1/2013
APN/Parcel/PIN	10904401	County	BEDFORD

CURRENT DEED

Grantee	USA WASTE OF VIRGINIA LANDFILLS, INC.	Deed Date	10/30/2002
Grantor	SYNAGRO-WWT, INC.	Recorded Date	6/20/2003
Consideration	\$1.00	Instrument Book/Page	030012294
Sale Price	N/A	Deed Type	DEED

Notes:

TAX INFORMATION

Year	Property Tax Status	Due Date	Amount
2012	PAID		\$316.00
Notes:		TOTAL ASSESSED VALUE	
			\$63,200.00

OPEN MORTGAGE/DEED OF TRUST INFORMATION

Mortgagor	NO OPEN MORTGAGES OF RECORD FOR	Dated	
Mortgagee	CURRENT OWNER FOR SUBJECT PROPERTY	Date Recorded	
Trustee		Instrument Book/Page	
Type		Original Amount	
Related		Recorded Date Book/Page	
Related		Recorded Date Book/Page	

RELATED JUDGMENTS, UCC AND LIENS AGAINST OWNER

Instrument #	Description	Date Recorded	Amount
	NO OPEN JUDGMENTS OR LIENS FOUND		
	FOR CURRENT OWNER FOR SUBJECT PROPERTY		

EASEMENTS AND RESTRICTIONS FOR CURRENT OWNER AGAINST PROPERTY

Instrument #	Description	Date Recorded
	NO EASEMENTS OR RESTRICTIONS FOUND FOR CURRENT	
	OWNER ON SUBJECT PROPERTY	

ADDITIONAL COMMENTS/INFORMATION

Matters affecting the above real estate which do not directly appear among the land records, or are not indexed to the exact listed names and legal descriptions above are not included in this report. This is not a commitment for insurance nor is it an opinion on marketability of title. Subject to terms and conditions at TitleSearch.com

030012294

8 42,500.00

DEED

THIS DEED, made this 30th day of October, 2002, by and between SYNAGRO - WWT, INC., a Maryland corporation, formerly known as WHEELABRATOR WATER TECHNOLOGIES, INC., SUCCESSOR THROUGH MERGER TO THE WHEELABRATOR CORPORATION, as Grantor, and USA WASTE OF VIRGINIA LANDFILLS, INC., a Delaware corporation, as Grantee, having a tax mailing address of P.O. Box 1450, Chicago, IL 60690-1450,

WITNESSETH:

For and in consideration of the sum of One Dollar (\$1.00) and other good and valuable consideration, the receipt of which is hereby acknowledged, Grantor does hereby grant, convey and quit claim unto Grantee, subject to the exceptions, covenants, and conditions hereinafter set forth, the real estate described in EXHIBIT A, attached hereto.

This conveyance is hereby made subject to (a) general and special real estate taxes and installments of special assessments, which Grantee assumes and agrees to pay; (b) Covenants, conditions, easements and restrictions of record; (c) Zoning and building laws and ordinances; and (d) Acts done or suffered by Grantee or claims made by, through or under Grantee.


TO HAVE AND TO HOLD the above granted premises, together with all appurtenances thereunto belonging, unto the Grantee, its successors and assigns, forever.

IN WITNESS WHEREOF, SYNAGRO - WWT, INC., A MARYLAND CORPORATION, FORMERLY KNOWN AS WHEELABRATOR WATER TECHNOLOGIES, INC., SUCCESSOR THROUGH MERGER TO THE WHEELABRATOR CORPORATION, has caused its name to be hereunto subscribed by its proper officers, duly authorized, as of the day and year first above written.

SYNAGRO - WWT, INC., A MARYLAND CORPORATION
FORMERLY KNOWN AS WHEELABRATOR WATER
TECHNOLOGIES, INC., SUCCESSOR THROUGH
MERGER TO THE WHEELABRATOR CORPORATION

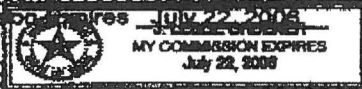
BY: 
Officer Name: Alvin L. Thomas II
Officer Title: Vice President & Secretary

ATTEST:


Assistant Secretary

STATE OF Texas)
COUNTY OF Harris) SS:

The foregoing instrument was acknowledged before me this 30th day of October, 2002, by Alvin L. Thomas II and attested by Tom Bintz, Assistant Secretary, both officers of SYNAGRO - WWT, INC., a Maryland corporation formerly known as Wheelabrator Water Technologies, Inc., Successor through merger to The Wheelabrator Corporation, on behalf of the corporation.

J. Leslie Ordener
J. Leslie Ordener, Notary Public
My Commission Expires July 22, 2008


THIS INSTRUMENT
PREPARED BY

Gregory J. Constantino, Esq.
GOLDSTINE SKRODZKI RUSSIAN NEMEC
AND HOFF, LTD.
835 McClintock Drive
Burr Ridge, IL 60527

AFTER RECORDING,
MAIL TO:

Deborah Nendick
Real Estate Department
WASTE MANAGEMENT, INC.
720 East Butterfield Road
Lombard, IL 60148

MAIL FUTURE TAX
BILLS TO:

USA WASTE OF VIRGINIA LANDFILLS, INC. d/b/a
Wheelabrator Landfill
C/o WASTE MANAGEMENT, INC.
P.O. Box 1450
Chicago, IL 60690-1450

EXHIBIT A
Legal Description

All that certain lot, piece or parcel of land situate, lying and being in the County of Bedford, Virginia, containing 12.626 acres, known and designated as Lot 1, as shown on that certain plat entitled, "Resurvey of 29.322 Acres, Property of Wheelabrator Corporation, City of Bedford, Va. And Center Dist., Bedford Co., Va", made by Shrader Engineering & Land Surveying, Inc., and dated May 14, 1991, and duly recorded in the Clerk's Office of the Circuit Court for the County of Bedford, Virginia, in Plat Book 27, at Page 364.

AND BEING a part of the same property conveyed to The Wheelabrator Corporation by the following deeds 1) from Allied Corporation successor by merger to Signal Applied Technologies, Inc. successor by merger to Wheelabrator-Frye, Inc. dated May 22, 1986 and recorded in Deed Book 617 at page 770; 2) from W.E. Cundiff Company, Inc., dated January 12, 1989 and recorded in Deed Book 715 at Page 309 both recorded among the land records of Bedford County, Virginia.

TAX MAP / PARCEL NO. 109-A-45A / 10904401

Together with a non-exclusive easement of right-of-way, to and from the above-described parcel and Abrasive Avenue as created by reservation contained in deed dated July 19, 1991 by and between The Wheelabrator Corporation and Wheelabrator Abrasives, Inc. recorded July 19, 1991, in Deed Book 806, page 59, among the land records of Bedford County, Virginia.

☒ RETURNED
☐ MAILED

Southern Title - 157.50

INSTRUMENT #030012294
RECORDED IN THE CLERK'S OFFICE OF
BEDFORD COUNTY ON
JUNE 20, 2003 AT 10:42AM
\$42.50 GRANTOR TAX WAS PAID AS
REQUIRED BY SEC 58.1-802 OF THE VA. CODE
STATE: \$21.25 LOCAL: \$21.25
CAROL W. BLACK, CLERK
BY: Sharon W. Overstreet (DC)
: _____ (DC)