



*Commonwealth of Virginia*

***VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY***

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Stefanie K. Taillon  
Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus  
Director

**MEMORANDUM**

TO: David Wilson  
Environmental Program Manager  
Virginia Department of Transportation  
1401 East Broad Street  
Richmond, Virginia 23219

DATE: August 3, 2026

FROM: Stephanie Houston, Hazardous Waste Cleanup Program Manager  
Office of Remediation Programs  
1111 E. Main Street, Suite 1400, Richmond, VA 23219  
[Stephanie.Houston@deq.virginia.gov](mailto:Stephanie.Houston@deq.virginia.gov) / (804)584-3143

RE: **Long Term Stewardship Report**  
Virginia Department of Transportation (VDOT) Culpeper District Complex  
EPA ID VAD980715064

COPIES: Kristin Koroncai, Jacqueline Morrison – USEPA Region III  
Tara Mason, Sarah Dyer – DEQ-CO  
Jim Datko – DEQ-NRO  
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The Virginia Department of Environmental Quality, Office of Remediation Programs (DEQ) has prepared the attached report following the Long-Term Stewardship evaluation performed on Date, Year at the VDOT Culpeper District Complex located in Culpeper, VA. The inspection found no outstanding items with compliance of engineering and institutional controls as required under the Facility's Hazardous Waste Management Permit (Permit) for post-closure care and corrective action dated December 12, 2018 and the UECA Environmental Covenant dated January 29, 2018.

You may contact me to discuss any questions.



## HAZARDOUS WASTE CLEANUP PROGRAM LONG TERM STEWARDSHIP EVALUATION

### 1. Site Information

|                        |                                |                                  |                |
|------------------------|--------------------------------|----------------------------------|----------------|
| Facility Name          | VDOT Culpeper District Complex | EPA ID Number                    | VAD980715064   |
| DEQ Representative(s)  | Stephanie Houston              | Report Date                      | July 30, 2026  |
| Site Representative(s) | David Wilson                   | Field Visit Date (if Applicable) | March 23, 2026 |

### 2. Long-Term Stewardship Evaluation Background

Long-term stewardship (LTS) refers to the activities necessary to ensure that engineering controls (ECs) are maintained and that institutional controls (ICs) continue to be observed. The purpose of the EPA Region 3 LTS program is to periodically assess the efficacy of the implemented remedies (i.e., ECs and ICs) and to update the community on the status of the Hazardous Waste Cleanup facilities. In October 2024, EPA changed the name of its “Resource Conservation and Recovery Act Corrective Action Program” to the “Hazardous Waste Cleanup Program.” This rebranding is intended to increase broad understanding of the purpose of the program. The LTS assessment is conducted in two-fold, which consists of a record review and a field inspection, to ensure that the remedies are implemented and maintained in accordance with the final decision.

The Hazardous Waste Cleanup Program has identified key elements of effective Long-Term Stewardship for hazardous waste cleanups. The LTS Report took into consideration the following elements while preparing this report:

Element 1 – Legal Authorities

Element 2 – Information Regarding Engineering and Institutional Controls

Element 3 – Long-Term Facility Oversight, Monitoring, and Maintenance

Element 4 – Recordkeeping and Tracking

Element 5 – Meaningful Engagement and Consultation

Element 6 – Funding

Element 7 – Enforcement

Element 8 – Enforceable Mechanisms

Element 9 – Dedicated Resources

### 3. Site Background and Current Status

The site is subject to 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 and 6992k.



## HAZARDOUS WASTE CLEANUP PROGRAM LONG TERM STEWARDSHIP EVALUATION

|                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Current Site Use                                                                          | Storage and maintenance of VDOT vehicles, storage of materials, refurbishment of used signs, various administrative and dispatch services                                                                                                                                                                                                                                                                           |
| Current Ownership                                                                         | VDOT                                                                                                                                                                                                                                                                                                                                                                                                                |
| Historic Use(s)/Background                                                                | <p>The Culpeper District headquarters facility has been in operation since the late 1930's. Various activities conducted or historically conducted at the site include storage/maintenance of VDOT vehicles, storage of materials, sign production, and various administrative/dispatch services.</p> <p>Additional details can be found on the <a href="#">EPA Hazardous Waste Cleanup page for this site</a>.</p> |
| Contaminants of Concern                                                                   | 1,2-dichloropropane, tetrachloroethene, cobalt                                                                                                                                                                                                                                                                                                                                                                      |
| Remedy                                                                                    | <p>A <a href="#">Statement of Basis</a> dated June 2014 described the following remedy:</p> <ol style="list-style-type: none"> <li>1.) Excavation of impacted soils at SWMUs 8 and 9</li> <li>2.) Continued groundwater monitoring at two Hazardous Waste Management Units (HWMUs)</li> <li>3.) Institutional controls</li> </ol>                                                                                   |
| Land Use Control Mechanism                                                                | <a href="#">UECA Environmental Covenant</a> recorded January 29, 2018.                                                                                                                                                                                                                                                                                                                                              |
| Identify any proposed changes to Site Use, Development or Ownership Identified during LTS | No changes to site use are proposed at this time.                                                                                                                                                                                                                                                                                                                                                                   |

### 4. Long Term Stewardship Element Review

**Elements 1, 7, and 8:** Legal Authorities, Enforcement and Mechanisms

| Task                                                                                                                                                                                                           | <u>Yes</u>                          | <u>No</u>                | <u>N/A</u>               | Notes                                                                                                                                                       |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|--------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Have applicable federal, state, local authorities been identified at the site? If so, is Coordination with relevant Programs/Authorities Required, to include but limited to DEQ Regional Office coordination? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | State is the authority through a Hazardous Waste Permit and a UECA Environmental Covenant recorded 10/11/2013                                               |
| Has the Enforcement Authority been identified and reviewed as part of the LTS process. Designate in Notes.                                                                                                     | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <ul style="list-style-type: none"> <li>• RCRA Section 3004(u) and (v)</li> <li>• Virginia Uniform Environmental Covenants Act §10.1-1238 et seq.</li> </ul> |



## HAZARDOUS WASTE CLEANUP PROGRAM LONG TERM STEWARDSHIP EVALUATION

| Task                                                                                                                               | <u>Yes</u>                          | <u>No</u>                | <u>N/A</u>               | Notes                                                                                                                            |
|------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|--------------------------|----------------------------------------------------------------------------------------------------------------------------------|
| Is there a mechanism in place to implement the remedy (Permit/Order/UECA-Compliant Covenant)? If so, please designate it in Notes. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <ul style="list-style-type: none"> <li>• DEQ Hazardous Waste Management Permit</li> <li>• UECA Environmental Covenant</li> </ul> |

### Element 2: Info on Engineering & Institutional Controls

| Task                                                                                                                           | <u>Yes</u>                          | <u>No</u>                           | <u>N/A</u>               | Notes / Next Steps                                                                |
|--------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|-------------------------------------|--------------------------|-----------------------------------------------------------------------------------|
| Are Engineering Controls/Institutional Controls (EC/ICs) Required                                                              | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |                                                                                   |
| Have the ICs specified in the remedy been implemented?                                                                         | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | UECA Environmental Covenant recorded 1/29/2018                                    |
| Do the ICs provide control for the entire extent of contamination (entire site or a specific portion)?                         | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |                                                                                   |
| Are the ICs eliminating or reducing exposure of all potential receptors to known contamination?                                | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |                                                                                   |
| Are the ICs effective and reliable for the activities (current and future) at the property to which the controls are applied?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |                                                                                   |
| Is the facility being used for residential purposes?                                                                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |                                                                                   |
| Does the Geospatial PDF on EPA Webpage accurately reflect controls, and has it been field verified?                            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | <a href="#">GeoSpatial PDF</a>                                                    |
| Are reporting procedures being met, if required?                                                                               | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |                                                                                   |
| Are modifications to the IC implementation mechanism needed as a result of site changes? (i.e. UECA Covenant, Permit or Order) | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Permit is currently being renewed with no site changes nor changes to the remedy. |

### Element 3: Facility Oversight & Monitoring

| Task                                                                                 | <u>Yes</u>                          | <u>No</u>                | <u>N/A</u>               | Notes / Next Steps |
|--------------------------------------------------------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------------|
| Is there a Site-Specific Monitoring plan (MMP/O&M Plan/Groundwater Monitoring Plan)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                    |
| Are periodic inspections required and/or conducted?                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                    |
| Are there procedures in place to address control failures?                           | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                    |



## HAZARDOUS WASTE CLEANUP PROGRAM LONG TERM STEWARDSHIP EVALUATION

| Task                                                                                                                                           | <u>Yes</u>                          | <u>No</u>                           | <u>N/A</u>               | Notes / Next Steps                                                                                                                           |
|------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|-------------------------------------|--------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| Have the risk of potential pathway exposures addressed under Corrective Action changed based on updated screening levels and new technologies? | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |                                                                                                                                              |
| <b>Groundwater Review</b>                                                                                                                      |                                     |                                     |                          |                                                                                                                                              |
| Is groundwater onsite used for potable purposes?                                                                                               | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |                                                                                                                                              |
| Is the Facility connected to a public water supply?                                                                                            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |                                                                                                                                              |
| Have any new wells been installed at the facility?                                                                                             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |                                                                                                                                              |
| Are the current groundwater flow rate and direction similar as mentioned in the previous studies?                                              | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | For the first time since 2003, MW-9 (background) and 2 Paint Pit wells (MW-16, MW-3) were dry during 6/27/2025 sampling event.               |
| Groundwater contaminants stable or decreasing in concentration?                                                                                | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |                                                                                                                                              |
| Are groundwater monitoring wells still in place?                                                                                               | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | The permit lists 27 wells used for sampling and measuring elevation. The Field Review checklist noted 35 wells. Older wells may still exist. |
| Any evidence or reason to re-evaluate the number and location of monitoring points and/or monitoring frequency?                                | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |                                                                                                                                              |
| For wells where groundwater monitoring is no longer required, have the wells been decommissioned?                                              | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | The Field Review checklist noted 35 wells when 27 are listed in the Permit. Older wells may still exist.                                     |
| Is there evidence of monitored natural attenuation (and/or progress in made in meeting remedial goals) occurring in groundwater?               | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |                                                                                                                                              |

### Element 4: Recordkeeping & Tracking

| Task                                                                                                | <u>Yes</u>                          | <u>No</u>                | <u>N/A</u>               | Notes / Next Steps                                                                                                  |
|-----------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|--------------------------|---------------------------------------------------------------------------------------------------------------------|
| Are records maintained and shared with Stakeholders?                                                | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |                                                                                                                     |
| Are RCRA Info codes and EPA webpage current with required codes and site information and documents. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | RCRA Info codes and EPA webpage are current as of the last LTS (2020) and will be updated with this LTS evaluation. |



## HAZARDOUS WASTE CLEANUP PROGRAM LONG TERM STEWARDSHIP EVALUATION

### Element 5: Engagement & Consultation

| Task                                                                                                                                    | <u>Yes</u>                          | <u>No</u>                           | <u>N/A</u>               | Notes / Next Steps                                                                                   |
|-----------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|-------------------------------------|--------------------------|------------------------------------------------------------------------------------------------------|
| Have all relevant regulatory and community stakeholders been identified and evaluated if any additional outreach or feedback is needed? | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |                                                                                                      |
| Are there plans to develop or transfer the property?                                                                                    | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |                                                                                                      |
| Is the EPA Fact Sheet up-to-date and does current site use match existing information?                                                  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | EPA Fact Sheet is up-to-date as of the last LTS (2020) and will be updated with this LTS evaluation. |

### Element 6: Funding

| Task                                                                                                               | <u>Yes</u>               | <u>No</u>                           | <u>N/A</u>               | Notes / Next Steps                                                                                  |
|--------------------------------------------------------------------------------------------------------------------|--------------------------|-------------------------------------|--------------------------|-----------------------------------------------------------------------------------------------------|
| Is there a Cost Estimate associated with long-term stewardship and/or financial assurance required and up-to-date? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | In accordance with 40 CFR 264.140(c), the Facility is exempt from financial assurance requirements. |

### Element 9: Dedicated Resources

| Task                               | <u>Yes</u>                          | <u>No</u>                | <u>N/A</u>               | Notes / Next Steps     |
|------------------------------------|-------------------------------------|--------------------------|--------------------------|------------------------|
| Ensure adequate qualified staff    | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Included in the Permit |
| Conduct ongoing training           | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Included in the Permit |
| Maintain outreach and coordination | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Included in the Permit |

## 5. Summary of Key Gaps and Next Steps

There were no deficiencies identified during the Long Term Stewardship evaluation. Older wells appear to still exist onsite; the Facility has not abandoned them in case they can be of future use (e-mail with John Voorhees, 7/30/2026). The site will be entered in the EPA RCRAInfo Database as CAS88P2 - LT Stewardship #2 – Pass.



**HAZARDOUS WASTE CLEANUP PROGRAM  
LONG TERM STEWARDSHIP EVALUATION**

**Attachment 1  
Field Observation**

AUGUST 2026

# HAZARDOUS WASTE GENERAL FACILITY CLOSURE & POST-CLOSURE CHECKLIST WITH LTS

REVISED MAY 2025

|               |                                     |               |              |
|---------------|-------------------------------------|---------------|--------------|
| Facility Name | VDOT Culpeper District Headquarters | EPA ID Number | VAD980715064 |
|---------------|-------------------------------------|---------------|--------------|

|                       |                                                                                                               |      |                |
|-----------------------|---------------------------------------------------------------------------------------------------------------|------|----------------|
| DEQ Representative(s) | Christina Archambeault, Hazardous Waste Inspector<br>Sarah Dyer, Central Office Hazardous Waste Permit Writer | Date | March 23, 2026 |
|-----------------------|---------------------------------------------------------------------------------------------------------------|------|----------------|

NA = Not Applicable, NC = Non-Compliance

| REGULATION | [40 CFR CITATION] | YES | NO | NA | NC |
|------------|-------------------|-----|----|----|----|
|------------|-------------------|-----|----|----|----|

## SECTION A – GENERAL OPERATING REQUIREMENTS

|                                                                                                                                                                                                                                                                                                        |                                     |                                     |                                     |                          |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------|
| 1. What was the original operating hazardous waste unit, i.e., surface impoundment, waste pile, etc.? List all that apply. [40 CFR 265.31] <b>Paint Pit and Sign Shop Vat Hazardous Waste Management Units (HWMUs)</b>                                                                                 |                                     |                                     |                                     |                          |
| 2. On what date did post-closure care begin? <b>March 16, 2016 &amp; modified effective December 12, 2018</b>                                                                                                                                                                                          |                                     |                                     |                                     |                          |
| 3. Is the ground water monitoring system in place? <b>Yes</b>                                                                                                                                                                                                                                          |                                     |                                     |                                     |                          |
| 4. How many wells are in the monitoring system? <b>8 (sampling) and 27 (monitoring)</b>                                                                                                                                                                                                                |                                     |                                     |                                     |                          |
| 5. What is the ground water monitoring phase of the facility? (Detection or Assessment)                                                                                                                                                                                                                |                                     |                                     |                                     |                          |
| 6. Are there any conditions that indicate that the owner/ operator does not maintain and monitor the groundwater monitoring system in compliance with applicable requirements of Subpart F of this part? Note problems encountered in the <b>Comments</b> at the end of the checklist. [265.310(b)(3)] | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| What is the current usage of the area? <b>No current uses in the former HWMU's</b>                                                                                                                                                                                                                     |                                     |                                     |                                     |                          |
| 7. Does the owner/operator maintain the integrity and effectiveness of the final cover, including making repairs to the cover as necessary to correct the effects of settling, subsidence, erosion, or other events? [265.310(b)(1)]                                                                   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> |
| 8. Does the owner/operator prevent run-on and runoff from eroding or otherwise damaging the final cover? [265.310(b)(4)]                                                                                                                                                                               | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> |
| 9. Does the owner/operator protect and maintain, if present, surveyed benchmarks? [265.310(b)(5), 9VAC20-60-265.16.d.]                                                                                                                                                                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> |
| 10. Does the owner/operator maintain the function and integrity of the final cover as specified in the approved closure plan? [9VAC20-60-265.16.a.]                                                                                                                                                    | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> |
| 11. Does the owner/operator maintain and monitor the leachate collection, removal and treatment system, if present, to prevent excess accumulation of the leachate in the system? [9VAC20-60-265.16.b.]                                                                                                | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 12. Does the owner/operator maintain and monitor the landfill gas collection and control system, if present, to control the vertical and horizontal escape of gas? [9VAC20-60-265.16.c.]                                                                                                               | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 13. Does the owner/operator restrict access to the landfill as appropriate for its post closure use? Are there warning signs placed as needed to restrict access as appropriate for the post-closure use? [9VAC20-60-265.16.e.]                                                                        | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> |

## CLOSURE/POST-CLOSURE CHECKLIST

| REGULATION [40 CFR CITATION]                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | YES                                 | NO                       | NA                       | NC                       |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------------------|
| <b>14.</b> Review the post-closure plan and determine if the facility is following the plan as written. The following conditions are frequently included in Post-Closure Plans. Verify the facility plan for these or other requirements:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                     |                          |                          |                          |
| a. Is the condition of the cover inspected to ensure the above conditions are maintained?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b. Are inspections completed with the proper frequency? What is the frequency of inspections?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c. Is an inspection log maintained?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d. Is the post-closure contact person the same as specified in the plan? If not, please provide the name, address and telephone number of the new contact.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| <b>16.</b> Show any additional post-closure care requirements and compliance status.<br><br>DEQ staff reviewed groundwater monitoring sampling reports from 2023, 2024, and 2025 and noted that the facility maintained a complete historical record of the sampling events. As required by the approved permit, Attachment E, Post-Closure Care Plan, Section B., Inspection and Maintenance Schedule, and Attachment G, Inspection Requirements, the facility is required to conduct inspections of the facility as follows: <ul style="list-style-type: none"> <li>The permittee shall inspect annually for defective or disturbed benchmarks. <b>Verified.</b></li> <li>At least semiannually, inspect and maintain all monitoring wells and piezometers to sustain their original intended purpose. Monitoring well caps shall be locked at all times except when the monitoring wells are being sampled or maintained. Protective concrete aprons shall be inspected for subsidence and breakage. Monitoring wells shall be replaced or repaired as necessary. <b>Verified.</b></li> <li>Adequate security shall be maintained to prohibit unauthorized access to the site. <b>Facility is surrounded by a chain link fence and signage is posted.</b></li> <li>All inspections shall be logged and documentation provided in each Corrective Action Program annual groundwater monitoring report, which shall be maintained at the facility during the entire post-closure care period. <b>Verified.</b></li> <li>As required by the approved permit, Attachment H, Personnel and Training: Appropriate training shall be completed by all persons at VDOT Culpeper and/or their consultants who are or who may be involved in the task associated with hazardous waste post-closure care activity.               <ul style="list-style-type: none"> <li><b>The following training documents were reviewed: Waste Management, SPCC, RCRA Permit, HAZWOPER, OSHA 8-Hour</b></li> </ul> </li> </ul> |                                     |                          |                          |                          |

## CLOSURE/POST-CLOSURE CHECKLIST

| REGULATION [40 CFR CITATION] | YES | NO | NA | NC |
|------------------------------|-----|----|----|----|
| <b>COMMENTS:</b>             |     |    |    |    |
|                              |     |    |    |    |

### FOR CLOSURE/POST-CLOSURE FACILITIES THAT ARE ALSO IN CORRECTIVE ACTION – FIELD REVIEW ITEMS

| INSTITUTIONAL CONTROLS (ICs) REVIEW AND ASSESSMENT                                                                           | Yes                      | No                                  | N/A                                 | Notes |
|------------------------------------------------------------------------------------------------------------------------------|--------------------------|-------------------------------------|-------------------------------------|-------|
| 17. Are there plans to develop or sell the property?                                                                         | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |       |
| a. If yes, is/was a Material Management Plan required/followed, and are there any controls required for the new development? | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |       |

| <u>Groundwater Remedy Review and Assessment Questions:</u>                                                     | Yes                                 | No                                  | N/A                      | Notes    |
|----------------------------------------------------------------------------------------------------------------|-------------------------------------|-------------------------------------|--------------------------|----------|
| 18. Is groundwater onsite used for potable purposes?                                                           | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/> |          |
| 19. Is the Facility connected to a public water supply?                                                        | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |          |
| 20. Are groundwater monitoring wells still in place (# wells)?                                                 | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | 35 wells |
| 21. For wells where groundwater monitoring is no longer required, have the wells been properly decommissioned? | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> |          |

| <u>Surface and Subsurface IC Review and Assessment Questions:</u>                                           | Yes                      | No                                  | N/A                      | Notes |
|-------------------------------------------------------------------------------------------------------------|--------------------------|-------------------------------------|--------------------------|-------|
| 22. Is the facility being used for residential purposes?                                                    | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |       |
| 23. Is there evidence of recent construction or earth-moving activities or are there future plans for such? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |       |

| <u>Engineered Cap or Cover Review and Assessment Questions:</u>                                       | Yes                                 | No                                  | N/A                                 | Notes                     |
|-------------------------------------------------------------------------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|---------------------------|
| 24. Have vegetative landfill caps (name) been properly maintained?                                    | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/>            | Paint Pit & Sign Shop Vat |
| 25. Have any repairs been necessary? (i.e. regrading, filling, root removal)                          | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |                           |
| 26. Are there any necessary repairs that have not been made?                                          | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |                           |
| 27. Is the leachate collection system operating and effectively preventing groundwater contamination? | <input type="checkbox"/>            | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |                           |

## CLOSURE/POST-CLOSURE CHECKLIST

| <u>Miscellaneous EC Review and Assessment Questions:</u> | <u>Yes</u>                          | <u>No</u>                | <u>N/A</u>               | <u>Notes</u> |
|----------------------------------------------------------|-------------------------------------|--------------------------|--------------------------|--------------|
| 28. Is the security fence intact?                        | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |              |
| 29. Is the appropriate signage posted?                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |              |

See next page for list of LDR/LTS facilities

Additional CA Comments: