



Surface Water Impacts

Guidance Document for Landfills Released

It is the responsibility on the part of the facility inspector to recognize conditions that may indicate surface water impairment at your landfill. This has been established by a new guidance document that addresses surface water impacts at landfill facilities. It was released on February 22nd by the Department of Environmental Quality (DEQ). Per the guidance document, the following site conditions will be considered by your inspector:

1. Are surface water bodies present within or along the permitted solid waste facility boundary?
2. Is the surface water feature permanent, intermittent, or ephemeral in nature?
3. Is there visual evidence of potential landfill-derived surface water impact such as:
 - evidence of blowing trash or excessive sedimentation from failure to manage stormwater runoff,
 - presence of abnormal or unusual growth of bacterial mats coating the channel bottom and sides (commonly orange, grey, or black in color; and bulbous, spongy, or filamentous in form),
 - dead aquatic life, or
 - odors or coloration which might suggest chemical discharge.

If any of the above conditions are observed, then the impact is to be verified by one of the following methods:

1. Photographic or video evidence of impact obtained during the site inspection,
2. Analysis of surface water samples (acquired by either DEQ staff or representatives of the permittee), and/or
3. Results of a benthic macroinvertebrate survey, with results compared to a similar survey undertaken at an unimpacted reference section (preferably onsite).

Presently, both the DEQ's Waste and Wastewater programs have the authority to resolve violations caused by unpermitted landfill-derived discharges to surface water or groundwater. The guidance augments existing Water Guidance 00-2010, and promotes coordination between the two divisions relative to the groundwater corrective action and VPDES programs. Where surface water may be impacted by a groundwater discharge exceeding facility Groundwater Protection Standards, a VPDES permit will not be issued unless the discharge is related to some form of active remediation / treatment as part of a groundwater corrective action. In other words, the discharge to surface water via groundwater will be required to meet facility GPSs and not VPDES surface water quality standards.

You may view the entire guidance document on line at <http://www.deq.virginia.gov/waterguidance/permits.html>. You may also contact any of the following at Draper Aden Associates: Mike Lawless (mlawless@daa.com) or Lynn Klappich (lklappich@daa.com) at (540) 552-0444, or Bill Hase (bhase@daa.com) or Rip Ford (rford@daa.com) at (804) 264-2228, for more information or to discuss how this new guidance may affect your facility.

If you would like to have your name removed from our fax list, please send your request to chanks@daa.com.