	LCM Corporation Safety Management System		Doc No:	FIRSTAID
			Initial Issue Date	1/02/2012
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If 911 is not available refer to the list of posted phone numbers for prearranged medical response providers. All LCM Corporation authorized first responders shall have a cell phone as a means of communications; otherwise hand held radios or telephones shall be used as a means of communication.

Supplies and Equipment

First aid supplies shall be easily accessible when required. Always follow the manufacturer's instructions when using the materials in the first aid kit.

All LCM Corporation first aid kits contain appropriate items determined to be adequate for the environment in which they are used and if on a construction site are stored in a weather proof container with individual contents sealed from the manufacturer for each type of item.

LCM Corporation is responsible to ensure the availability of adequate first aid supplies and to periodically reassess the availability for supplies and to adjust its inventories. First Aid kits are to be inspected:

- On the first working day of each week to verify that they are fully stocked and that no expiration dates have been exceeded, and
- Before being sent out to each job, and
- Replace any items that have exceeded their expiration dates or that have been depleted.

Where the eyes or body of any person may be exposed to injurious corrosive materials, a safety shower and/or eye wash (suitable facilities) or other suitable facilities shall be provided within the work area. Ensure expiration dates are checked and water used in storage devices is sanitized.

An assessment of the material or materials used shall be performed to determine the type flushing/drenching equipment required. At client job sites, portable or temporary stations must be established prior to the use of corrosive materials.

Transportation


Based on the first responder's assessment of the injuries involved, decide whether the injured requires to be taken directly to a hospital's emergency room, occupational medicine provider or administer first aid on location.

Examples of serious injuries that result in the injured being transported to a medical provider are those resulting in severe blood loss, possible permanent disfigurement, head trauma, spinal injuries, internal injuries and loss of consciousness. Keep in mind that the needs and wellbeing of the injured are the first priority.

Proper equipment for prompt transportation of the injured person to a physician or hospital or a communication system for contacting necessary ambulance service shall be provided.


Choices to consider include: private automobile, company vehicle, helicopter, crew boat, EMS vehicles including medi-vac helicopters, or any other transportation that can provide safe transportation to the hospital or doctor's office in order to provide medical attention to the injured in the quickest manner without any additional complications or injuries to the injured employee.

Transportation needs must be preplanned and coordinated with the transportation provider prior to an incident requiring such service.

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Training

Volunteers or selected employees are trained by the American Red Cross or equivalent in CPR and first aid. Each of these trained and certified employees are equipped with protective gloves and other required paraphernalia.

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		Revision No.	0
		Next Review Date:	Annually
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Purpose

The purpose of this program is to provide fire extinguisher procedures to ensure equipment is operable and employees have the knowledge to safely operate in case of a fire incident.

Scope

Applies to all LCM Corporation employees and all LCM Corporation locations.

Responsibilities

The Safety Manager is responsible for developing procedures for the use and care of fire extinguishers and for developing a training program for the proper use of these devices. The Manager is responsible for implementing fire extinguisher training at his location. The shop foremen are responsible for enforcing the provisions of this section of the safety manual. All employees are responsible for following these provisions.

Procedure


Selection and Distribution

Portable fire extinguishers shall be provided for employee use and selected and distributed based on the classes of anticipated workplace fires and on the size and degree of the hazard which would affect their use. Fire extinguishers used by this company are for four classes of fires:

- Class A Fire Extinguishers. Use on ordinary combustibles or fibrous material, such as wood, paper, cloth, rubber and some plastics. Travel distance for employees to any extinguisher is 75 feet (22.9 m) or less.
- Class B Fire Extinguishers. Use on flammable or combustible liquids such as gasoline, kerosene, paint, paint thinners and propane. Travel distance from the Class B hazard area to any extinguisher is 50 feet (15.2 m) or less.
- Class C Fire Extinguishers. Use on energized electrical equipment, such as appliances, switches, panel boxes and power tools. Travel distance from the Class C hazard area to any extinguishing agent is 50 feet (15.2 m) or less.
- Class D Fire Extinguishers. Use on combustible metals, such as magnesium, titanium, potassium and sodium. Travel distance from the combustible metal working area to any extinguishing agent is 75 feet (22.9 m) or less.

Labeling Of Fire Extinguishers

Fire extinguishers are to be mounted in easily accessible locations that are indicated by a sign that reads "Fire Extinguisher". Fire extinguishers are to be located so that no employee will ever be more than 75 feet from an extinguisher. No equipment, boxes or product may be placed (even temporarily) in the way of a fire extinguisher. Each fire extinguisher will be assigned a unique number.

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Maintenance

All fire extinguishers shall be mounted no higher and no lower than four (4) feet from the floor. All fire extinguishers shall be maintained as follows:

- Numbered to identify their proper location
- Fully charged and in operable condition
- Clean and free of defects
- Readily accessible at all times

Inspection, Maintenance and Testing

All fire extinguishers are to be visually inspected by LCM Corporation employees monthly. All fire extinguishers are to receive an annual maintenance check by certified personnel from a fire extinguisher dealer. Fire extinguishers are to be inspected and re-charged by certified personnel after any use.

Any fire extinguisher that shows a loss of pressure during the monthly inspection will be inspected and re-charged by certified personnel. Completed fire extinguisher inspection logs will be maintained in the safety files and become a part of the safety records. They are to be maintained for 5 years.

Use

In the event of a fire, one employee will get the nearest fire extinguisher and use it to attempt to put the fire out. All other employees in the immediate area will prepare to evacuate if needed. All other employees in the building need to be advised that a fire is in progress.

The employee attempting to extinguish the fire will break the safety seal on the handle and pull the pin. He will then aim his extinguisher at the base of the fire and discharge it with a sweeping motion from side to side; continuing until the fire is out or the extinguisher is emptied.

Remember that a standard fire extinguisher will be emptied in about 10 to 15 seconds. If the fire is not out when the extinguisher has been completely discharged, the employees must evacuate the area.

Training and Education


The purpose of this section is to establish training procedures which are necessary for the proper use and understanding of a fire extinguisher and incipient stage fire fighting. Training will occur prior to initial assignment and at least annually thereafter.

On even numbered years this training will be conducted by a member of the local fire department (where possible) and will include "live fire" hands on use of the extinguisher. On odd number years this training will be conducted by the Safety Manager and will include a demonstration of the use of a fire extinguisher, without actually discharging the unit.

New employees will be given the odd number year training upon hire.

Initial Training Outline

- General principles of a fire
- Hazards employed with an incipient stage fire(s)
- When to "back off" (evacuate) of an incipient stage fire(s)

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- General fire principles of a fire extinguisher
- Hazards employed with the use a fire extinguisher
- Use of a fire extinguisher


Retraining

Retraining shall reestablish employee proficiency and introduce new or revised control methods and procedures, as necessary. Retraining shall be provided for all authorized and affected employees whenever there is:

- An annual basis or
- A change in job assignment or
- LCM Corporation has reason to believe that there are deviations from or inadequacies in the employee's knowledge or use of fire extinguishers or fire prevention procedures.

Training Documentation

- All training will be documented and each employee's understanding will be subject to a "hands-on" test.
- Documentation will consist of; as a minimum, the employee's name, the trainer's name, the date of the training, and an outline of training provided.

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Purpose

The purpose of this waste management strategy was developed to provide guidance and requirements necessary for efficient, effective and compliant waste management during construction and operations.

Scope

This procedure applies to all COMPANY employees. When work is performed on a non-owned or operated site, the operator's program shall take precedence, however, this document covers COMPANY employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

Procedure

The COMPANY Safety Manager or other designated person in his or her absence is accountable for managing waste and disposition of wastes generated at the work site.

Waste Estimation


Each work site will estimate the waste, trash and/or scrap that will be generated and taken into consideration prior to work being performed so the need for containers and waste removal, if necessary, can be determined.

Each site will utilize the following for planning of dumpster scheduling and total non-hazardous dry waste material. These figures do not include neither recycling nor waste minimization efforts and reflect no use of an incinerator. Dumpster figures are based on a 40 yard container and can be modified if another size is used by changing the table below.

SAMPLE ONLY - SOLID WASTE						
	Number of Employees	10	25	35	50	100
Total Estimated Square Feet of Waste (@ 0.675 cu ft per person daily)						
Daily		7	17	24	34	68
Weekly		47	118	165	236	473
Monthly (4.33 wks)		205	511	716	1,023	2,046
Annual		2,455	6,138	8,593	12,276	24,551
Total Estimated Weight of Waste (@ 4lb per person daily)						
Daily		40	100	140	200	400
Weekly		280	700	980	1,400	2,800
Monthly (4.33 wks)		1,212	3,031	4,243	6,062	12,124
Annual		14,549	36,372	50,921	72,744	145,488
Number of Total Dumpster Fills 40 yard dumpster 7x8x22 = 1,232 square feet						
Daily		0.0	0.0	0.0	0.0	0.1
Weekly		0.0	0.1	0.1	0.2	0.4
Monthly (4.33 wks)		0.2	0.4	0.6	0.8	1.7
Annual		2.0	5.0	7.0	10.0	19.9

COMPANY must coordinate with the project site or owner to ensure proper disposal of wastes or scrap materials.

COMPANY must ensure the owner client is aware of whether wastes and scrap materials will be taken off site by COMPANY or will be disposed of on the owner client's site.

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Waste Segregation

- Do not mix waste streams
- Only place waste in the designated container, satellite accumulation area (SAA), recyclable accumulation area (RAA), universal waste accumulation area (UWAA) or designated dumpster.

Recycling

Wastes should be recycled whenever practicable. COMPANY will encourage proper segregation of waste materials to ensure opportunities for reuse or recycling occurs at each work site. The collection of recycled material will reduce the total load on the environment. Bins of sufficient size must be lined with a plastic bag and clearly labeled for use. Posters from COMPANY will be posted throughout the work site to encourage recycling. Collection bins will also be placed in administrative areas will follow the following color guiding:

- Blue - Paper
- Green - Aluminum cans
- Yellow - Plastic


Cardboard will be flattened, staples and excess shipping tape removed. No cardboard shall be placed in the dumpster used for the landfill.

Waste Handling Matrix


Each work site will develop a Waste Handling Matrix (sample shown) that will:

- Address safe practices related to the immediate storage and handling of waste, scrap or leftover material.
- The handling, organization and storage of waste and scrap materials to minimize potential impact to the environment. Waste materials shall be properly stored and handled to minimize the potential for a spill or impact to the environment. During outdoor activities receptacles must be covered to prevent dispersion of waste materials and to control the potential for runoff.


Waste Stream	Location	Activity Generating Waste	Hazardous/Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Aerosol Can Contents	Equipment Repair Shop	Puncturing of aerosol cans	Hazardous	SAA is self-contained in the equipment repair shop	Ship to assigned site for recycling or disposal	Read warnings before use of unit.
Aerosol Can Puncturing Unit Filter	Equipment Repair Shop	Filter Changes	Hazardous	Place in designated labeled container	Ship to assigned site for recycling or disposal	Change filter every 3 months
Aerosol Cans	Various Locations	Painting, lubricants, cleaning	Non-Hazardous if aerosol can is punctured and drained	Place punctured aerosol can in RAA storage drum	Crush RAA storage drum and place in the scrap metal dumpster from client.	See "Scrap Metal" for waste stream management

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Waste Stream	Location	Activity Generating Waste	Hazardous/Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Ash	Smart Ash Unit	Incineration of acceptable waste	Non Hazardous	Dispose of Immediately	Place in the Burnable Waste Dumpster	Gloves Goggles
Automotive and Heavy Equipment Parts-Used	Equipment Repair Shop and Fab Shop	Replacement	Non-Hazardous	Place in RAA	Returned to vendors for recycling	Starters, Alternators, Pumps, Transmissions
Batteries (Alkaline)	Various Locations	Battery Failures	Universal Waste	Place in the UWAA	"D" cell and below are acceptable in the Non-Burnable Waste Dumpster	Ship to designated site for recycling or disposal
Batteries (Lead Acid)	Equipment Repair Shop and Fab Shop	Battery Failures	Universal Waste	No storage allowed. Containment boxes are labeled and available in the shops.	Lead acid batteries are returned to the Vendor upon removal	Ship to designated site for recycling
Batteries (NiCad)	Various Locations	Battery Failures	Universal Waste	UWAA in the equipment repair shop.	Ship to assigned site for recycling or disposal	Cell phones, radios
Butane Torch Bottle	Various Locations	Mechanic activities	Excluded Hazardous if recycled	Place drained Butane Torch Bottles in RAA storage drum	Crush RAA storage drum and place in the scrap metal dumpster	Prosolv Butane Bottle processor I
Cardboard/Office Paper	Parts Department & Offices	Shipping Boxes & Office Activities	Non-Hazardous	Place in RAA	Place on pallet in RAA and band for shipment to assigned site for recycling.	
Computers Discarded	Parts Department & Offices	Replacement	Non-Hazardous	Place in RAA	Ship to assigned site for recycling or disposal	
Diesel Filters-Used	Equipment Repair Shop and Fab Shop	Filter Changes	Non-Hazardous	RAA for drained and crushed used filters	Drain for 12 hrs., crush and incinerate in Smart Ash unit	Place metal in recycle metal dumpster

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Waste Stream	Location	Activity Generating Waste	Hazardous/Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Diesel Rags	Various Locations	Mechanic activities	Non-Hazardous	Oily waste rag in clear bags w/yellow stripes.	Incinerated in Smart Ash unit	See "Ash" for management and disposal
Drained Diesel	Equipment Repair and Fab Shop	Draining diesel fuel and filters	Non-Hazardous when burned as off-Spec fuel	Place in "used oil" tank in the equipment repair shop and fab shop.	Burned for energy recovery in clean burn multi-oil heating system.	
Empty Paint Cans	Various Locations	Painting activities	Non-Hazardous	No storage allowed	Ship to assigned site for recycling or disposal	Paint cans must be RCRA empty.
Fluorescent Light Ballast	Various Locations	Failure	Non-Hazardous unless they contain PCB's or DEHP	None	Place in Non-Burnable Dumpster	Ballast will say on the label if it contains PCB's
Fluorescent Light Bulbs	Shops, Office Areas	Bulb replacement	Universal Waste	Place bulbs in their original container in the RAA in the shop area	Ship to assigned site for recycling or disposal	Label bulbs "Used Bulb" when put into RAA.
Glass	Various Locations	Replacement	Non-Hazardous	None	Place in Non-Burnable Dumpster	Ensure glass containers are empty.
Glycol Rags	Equipment Repair Shop and Fab Shop	Fluid Changes	Non-Hazardous	Oily waste rag WAA's lined w/clear bags w/yellow stripes.	Incinerated in Smart Ash unit	Minimize use of absorbent rags
Glycol-Used	Equipment Repair Shop and Fab Shop	Fluid Changes	Non-Hazardous	RAA - self-contained tank on recycling unit	Recycled in glycol recycling unit	Recycling unit stored in shop
Grinding Wheels	Equipment Repair Shop and Fab Shop	Grinding activities	Non-Hazardous	None	Place in Non-Burnable Dumpster	
Hoses & Belts	Equipment Repair Shop and Fab Shop	Replacement	Non-Hazardous	Place in Non-Burnable Dumpster	Place in Non-Burnable Dumpster	Drain all fluids from hoses

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Waste Stream	Location	Activity Generating Waste	Hazardous/Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Metal Shavings/Cuttings	Equipment Repair Shop and Fab Shop	Fabricating activities	Excluded Hazardous if recycled	Placed in recycle metal dumpster or metal only RAA's	Place in recycle metal dumpster	Ensure there are no free flowing cutting fluids present before disposal.
Oil Filters-Used	Equipment Repair Shop and Fab Shop	Oil filter changes	Excluded Hazardous	RAA for drained and crushed used filters	Drain for 12 hrs., crush and incinerate in Smart Ash unit	Place metal in recycle metal dumpster
Oil-Used	Equipment Repair Shop, Fab Shop, Service Trucks	Draining oil and filters	Excluded Hazardous if burned for energy recovery	Receiving sumps are located in the Equipment Repair Shop and Fab Shop	Burned for energy recovery in clean burn multi-oil heating system.	Keep lids on receiving sumps at all times. DO NOT PUT SOLVENTS INTO USED OIL
Oily Waste (rags, absorbents)	Various Locations	Mechanic activities, equipment drips and leaks	Non-Hazardous	Oily waste rag WAA's lined w/clear bags w/yellow stripes.	Incinerated in Smart Ash unit	Collected daily. See "Ash" for management and disposal
Paint Waste (rags, rollers, brushes, etc.)	Various Locations	Painting activities	Determine on per occurrence basis. Use MSDS or testing	If hazardous, store in the assigned area. If non-hazardous, no storage is required.	If hazardous, ship to assigned site for disposal. If non-hazardous, place in burnable waste dumpster.	Need to review MSDS, do analytical test, or use generator knowledge to make waste determinations.
Parts Cleaner Rags	Equipment Repair Shop	Cleaning parts	Non-Hazardous	Oily waste rag WAA's lined w/clear bags w/yellow stripes.	Incinerated in Smart Ash unit	See "Ash" for management and disposal
Scrap Metal	Various Locations	Fabrication activities & house cleaning	Excluded Hazardous if recycled	Placed in recycle metal dumpster or metal only RAA's	Place in recycle metal dumpster	Eye Protection Gloves
Sodium Vapor/ Metal Halide Light Bulbs	Various Locations	Bulb replacement	Universal Waste	Place bulbs in their original container in the RAA.	Ship to assigned site for recycling or disposal	Label bulbs "Used Bulb" when put into RAA.

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Waste Stream	Location	Activity Generating Waste	Hazardous/Non Hazardous	Safe Storage Practice	Disposal Method	PPE or Other Precautions
Tires	Various Locations	Replacement	Non-Hazardous	None	Place tires up to 20" rim diameter into dumpster.	
Toner Cartridges	Offices	Copiers, printers, fax machines	Non-Hazardous	Placed in original container in RAA	Ship to assigned site for recycling or disposal	Verify toner is expended before disposal.
Water Scrubber Filter & Absorbents	Equipment Repair Shop and Fab Shop	Filtering sump water in shops	Non-Hazardous	None	Incinerated in Smart Ash unit	See "Ash" for management and disposal
Welding Rods	Various Locations	Welding activities	Excluded Hazardous	Placed in recycle metal dumpster or metal only RAA's	Ship to assigned site for recycling or disposal	See "Scrap Metal" for waste stream management
Wood Waste	Various Locations	Various activities and shipping pallets	Non-Hazardous	Store on the far back corner of the pad or in the dump truck box if available.	Place in recycle wood dumpster	Pallets are refurbished and recycled when possible

Storage Requirements

COMPANY must ensure project related wastes are stored and maintained in an organized fashion to encourage proper disposal and minimize risks to employees. Proper waste receptacles must be provided for trash and materials that may be reused or recycled during a project.

PPE

For each site waste management plan COMPANY shall determine a PPE matrix that includes gloves, hand protection, eye and face protection and/or other necessary PPE.

Education and Training

Employees shall be instructed on managing waste generated at the work site and on the proper disposal method of wastes. Examples include:

- Instruction on the proper handling, storage and disposal of wastes and depending on the waste generated at the site to also include general instruction on disposal of non-hazardous wastes, trash or scrap materials. If wastes generated are classified as hazardous then employees shall be trained to ensure proper disposal and compliance with regulations.
- Minimization methods to reduce waste.
- Recycling methods and proper PPE to be utilized.

LCM CORPORATION TRANSFER STATION

EMERGENCY CONTINGENCY PLAN (9VAC20-81-485)

In the event of a fire, explosion, or any unplanned sudden or non-sudden releases of harmful constituents to the air or soil, LCM Corporation (LCM) personnel are to contact the LCM Emergency Response Team by calling 1-800-774-5583/1-540-798-9111 and by calling 911 for police and fire/rescue (medical).

All LCM Emergency Response Team members have access to the LCM Transfer Station facility 24 hours a day/7days a week.

LCM Primary Emergency Coordinator

Larry A. Logan

Phone: 1-800-774-5583/1-540-344-5583

Cell: 1-540-798-9111

Home Address: 4273 Parr Road
Salem, VA 24153

Lawrence C. Musgrove III

Phone: 1-540-344-5583

Cell: 1-540-798-2667

Home Address: 175 November Lane
Wirtz, VA 24184

21	White Goods	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
22	Friable Asbestos	127.80	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
23	Petroleum Contaminated Soil	4.20	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
24	Other Waste	5.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
25	Total	137.32	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

Facility Comments

Line 22 includes non friable also Line 24 includes petroleum contaminated sorbents .56cy and oil/water 4.76cy'

SUPPLEMENTAL SOLID WASTE INFORMATION AND ASSESSMENT PROGRAM REPORTING TABLE - FORM DEQ 50-25

Only those facilities that landfill Virginia incineration ash provide this information.

Permit No, Facility Name	Ash Amount	Unit of Measure
PBR173, US Central Intelligence Agency - George Bush Cntr		TONS
PBR197, US Department of Defense - Pentagon		TONS
PBR500, Wheelabrator Portsmouth Inc - Waste to Energy Fac		TONS
PBR503, John C Nordt Company Incorporated		TONS
PBR513, City of Harrisonburg - Resource Recovery Facility		TONS
PBR545, Covanta Fairfax Incorporated		TONS
PBR551, Covanta Alexandria Arlington Incorporated		TONS
SWP297, Hampton City - NASA Steam Plant		TONS

[General Instructions](#) [Help](#)



[Log Out](#)

SOLID WASTE INFORMATION AND ASSESSMENT PROGRAM REPORTING TABLE - FORM DEQ 50-25
 Note: Submission deadline is March 31st for the reporting period. Today's Date: 06/23/2016

Annual Reporting Period												
1 Facility Name		LCM Corp - Transfer Station										
2 Permit Number		PBR136			3 Date Last Submitted		03/29/2016		4 Annual Reporting Period		2015	
5 Preparer's First Name		Lawrence		Middle Initial	C	Last Name		Musgrove		Suffix	III	
6 Preparer's Telephone Number		(540)344-5										
7 Preparer's Email Address		LCMCORP@aol.com				An email address will be used to contact you in case of questions about this form submit						
Has there been a change to the Annual Fee Billing Contact, Address or Telephone Number? <input type="radio"/> Yes <input checked="" type="radio"/> No Please select Yes or No.												
8 Contact First Name		Lawrence			Contact Last Name			Musgrove, III		Contact Phone		(540)344-5583
Contact Address		P.O. Box 13487			Contact Email Address			lcmcorp@aol.com				
City		Roanoke		State	VA		Zip Code	24034		Zip Ext.		
9A and 9B Landfills only		9A Remaining Permitted Capacity		Only enter 10 digits (format: 9999999999).		Cubic Yards		9B Expected Remaining Permitted Life				
10 Does facility use active scales? <input type="radio"/> Yes <input checked="" type="radio"/> No					Landfills not using active scales - Enter the total amount landfilled in cubic yards (sum of all jurisdictions)							
11 Originating Jurisdiction		VA - Virginia			11A Statement of Economic benefits submitted? <input type="radio"/> Yes <input checked="" type="radio"/> No							
12 Facilities landfilling VA incineration ash : Received from(Permit No, FacilityName)					VA ash amount landfilled measured in <input checked="" type="radio"/> Tons or <input type="radio"/> Cubic Yards							
PBR173 , US Central Intelligence Agency - George Bush Cntr												
PBR197 , US Department of Defense - Pentagon												
PBR500 , Wheelabrator Portsmouth Inc - Waste to Energy Fac												
PBR503 , John C Nordt Company Incorporated												
PBR545 , Covanta Fairfax Incorporated												
PBR551 , Covanta Alexandria Arlington Incorporated												
SWP297 , Hampton City - NASA Steam Plant												

Waste amounts measured in Tons or Cubic Yards

Waste Type	Waste Management - Report Amount by weight or volume (Reporting units must be consistent for all fields of a particular waste type).										
	Total Amount of Waste Received (a)	Mined Materials (b)	On-site Management of Waste							Sent Off-Site to be:(f)	
			Landfilled (c)	Recycled (d)	Composted (e)	Incinerated (f)	Mulched (g)	Other (h)	Recycled	Treated, Stored, Disposed	
13 Municipal Solid Waste											
14 Construction /Demolition/Debris											
15 Industrial Waste											
16 Regulated Medical Waste											
17 Vegetative/Yard Waste											
18 Incineration Ash											
19 Sludge											
20 Tires											
21 White Goods											
22 Friable Asbestos	116.5000										135.3000
23 Petroleum Contaminated Soil	0.5600										0.5600
24 Enter a total of all other wastes on this line; list other types and their amounts in the comments area Other Waste	8.1200										3.3600
25 Total Do not enter values.	125.1800										139.2200

Facility Comments:

Line 22 includes non friable also
 Line 24 includes petroleum contaminated sorbents 1.96CY and oil/water 6.16CY

DEQ Comments:

[Save Changes](#) [Accept](#) [Reject](#) [Go To Summary Page](#)

Annual Reporting Period

[Print This Page](#)



General Instructions: Help

Log Out

SOLID WASTE INFORMATION AND ASSESSMENT PROGRAM REPORTING TABLE - FORM DEQ 50-25
 Note: Submission deadline is March 31st for the reporting period. Today's Date: 02/12/2019

Annual Reporting Period: 2017

1 Facility Name: LCM Corp - Transfer Station

2 Permit Number: PBR136

3 Date Last Submitted: 03/30/2018

4 Annual Reporting Period: 2017

5 Preparer's First Name: Lawrence

6 Preparer's Telephone Number: (540)344-5583

7 Preparer's Email Address: LCMCORP@aol.com

8 Contact First Name: Lawrence
 Contact Address: P.O. Box 13487
 City: Roanoke, State: VA
 Contact Email Address: lcmcorp@aol.com
 Contact Phone: (540)344-5583

9A and 9B Landfills only: 9A Remaining Permitted Capacity: 0
 9B Expected Remaining Permitted Life: 0

10 Does facility use active scales? Yes No

11 Originating Jurisdiction: VA - Virginia

12 Facilities landfilling VA incineration ash: Received from (Permit No./FacilityName)

11A Statement of Economic benefits submitted? Yes No

VA ash amount landfilled measured in: Tons or Cubic Yards

An email address will be used to contact you in case of questions about this form submission. Please select Yes or No.

Waste amounts measured in: Tons or Cubic Yards

Waste Management - Report Amount by weight or volume (Reporting units must be consistent for all fields of a particular waste type).

Waste Type	On-site Management of Waste					Sent Off-Site to be (f)			Stored On-Site (f)			
	Total Amount of Waste Received (a)	Mined Materials (b)	Landfilled (c)	Recycled (d)	Composted (e)	Incinerated (f)	Mulched (g)	Other (h)	Recycled	Treated, Stored, Disposed	Beginning of Reporting Period	End of Reporting Period
13 Municipal Solid Waste												
14 Construction / Demolition/Debris												
15 Industrial Waste	3.9200									3.9200		
16 Regulated Medical Waste												
17 Vegetative/Yard Waste												
18 Incineration Ash												
19 Sludge												
20 Tires												
21 White Goods												
22 Friable Asbestos	42.9000										17.7000	60.6000
23 Petroleum Contaminated Soil	1.6800									2.2400	0.5600	

Enter a total of all other wastes on this line; list other types and their amounts in the comments area Other Waste 24 4.7600						2.8000 2.5200 3.6400 63.4000
Total Do not enter values. 25 53.2600	3.0800 3.0800	8.6800 8.6800	21.9000 21.9000	63.4000 63.4000		

Facility Comments:
 Line 22 includes non friable asbestos also. Line 24 includes petroleum contaminated sorbents 1.12CY and oil/water 3.64CY

DEQ Comments:
 3/30/2018 DCP: Spoke with L. Musgrove. 2.24 cubic yards of Petroleum Contaminated Soil sent off site.

◀◀ Annual Reporting Period ▶▶

[Print This Page](#)

21	White Goods													
22	Friable Asbestos	51.40									56.10		27.20	22.50
23	Petroleum Contaminated Soil													
24	Other Waste	5.32								1.96			0.56	3.92
25	Total	56.72								1.96	56.10		27.76	26.42

Facility Comments

Line 22 includes non friable asbestos also. Line 24 includes fuel oil/water/wash water.'

SUPPLEMENTAL SOLID WASTE INFORMATION AND ASSESSMENT PROGRAM REPORTING TABLE - FORM DEQ 50-25

Only those facilities that landfill Virginia incineration ash provide this information.

Permit No, Facility Name	Ash Amount	Unit of Measure
--------------------------	------------	-----------------



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 1111 East Main Street, Ste. 1400, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

www.deq.virginia.gov

Matthew J. Strickler
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4000
1-800-592-5482

September 9, 2020

VIA ELECTRONIC MAIL

Mr. Lawrence C. Musgrove, III
President
LCM Corporation
Post Office Box 13487
Roanoke, Virginia 24034

RE: Solid Waste Financial Assurance Demonstration
LCM Corporation Transfer Station, Permit-by-Rule (PBR) Number 136

Dear Mr. Musgrove:

The Virginia Department of Environmental Quality (the Department) has completed its review of the documentation submitted by LCM Corporation (the Company) to demonstrate financial assurance for the closure costs associated with the above referenced solid waste facility as required by the Virginia Financial Assurance Regulations for Solid Waste Disposal, Transfer, and Treatment Facilities, 9 VAC 20-70 (the Regulation). This documentation has been prepared in accordance with the Regulation.

The Company has an approved closure cost estimate totaling \$6,109 and financial assurance in the amount of \$6,194 in the form of a certificate of deposit with Union Bank and Trust. In the event the technical cost estimate increases before the next review date of June 25, 2021, the Company may be required to increase the amount of financial assurance.

Please note that the obligation to demonstrate financial assurance is an annual one and the Company must update the cost estimate and financial assurance mechanism annually for inflation. You may call the Office of Financial Responsibility and Waste Programs at (804) 698-4067 sixty days prior to the review date to obtain the 2021 inflation factor. Your anniversary date is **June 25th**.

You may contact me at (804) 698-4067 or ronnie.calkins@deq.virginia.gov if you have any questions or require assistance. Thank you for your time and consideration in this matter.

Sincerely,

A handwritten signature in black ink that reads "Ronnie Calkins".

Ronnie Calkins
Office of Financial Responsibility & Waste Programs

cc: DEQ/WPC Common



COMMONWEALTH of VIRGINIA

Matthew J. Strickler
Secretary of Natural Resources

DEPARTMENT OF ENVIRONMENTAL QUALITY
Blue Ridge Regional Office
901 Russell Drive, Salem, VA, 24153
(540) 562-6700; Fax 1-804-698-4178
www.deq.virginia.gov

David K. Paylor
Director

Robert J. Weld
Regional Director

December 17, 2020

Sent via electronic mail

Mr. Lawrence C. Musgrove III
President
PO Box 13487
Roanoke, Virginia 24034
lmusgrove@musgroveassoc.com

WARNING LETTER

Re: LCM Corporation – Permit-by-Rule (PBR) #136
Unannounced compliance inspection – October 22, 2020

Dear Mr. Musgrove,

The Department of Environmental Quality (“DEQ” or “Department”) has reason to believe that the LCM Corporation may be in violation of the Virginia Waste Management Act, Va. Code § 10.1-1400 et seq. (“Act”), the Virginia Solid Waste Management Regulations, 9 VAC 20-81-10 et seq. (“Regulations”), and/or PBR #136.

This letter addresses conditions at the facility named above and also cites compliance requirements of the Act, Regulations, and PBR #136. Pursuant to Va. Code § 10.1-1455 (G), this letter is not a case decision under the Virginia Administrative Process Act, Va. Code § 2.2-4000 et seq. (“APA”). **DEQ requests that you respond within 30 days of the date of this letter.**

OBSERVATIONS AND LEGAL REQUIREMENTS

On October 22, 2020, staff from DEQ’s Blue Ridge Regional Office conducted a compliance inspection of the LCM Corporation. Staff also reviewed documents provided to DEQ during the course of the inspection. A copy of the inspection checklist is attached. The following describe the staff’s factual observations and identify the applicable legal requirements.

- 1. Observation:** During the inspection, DEQ staff observed the container containing friable asbestos, provided by HAM landfill, did not have the proper signage as required by the facility’s Operations Plan and the regulations.

Legal Requirements: Pursuant to 9VAC20-81-300.B, all facilities, except exempted facilities, shall be maintained and operated in accordance with the permit issued or permit-by-rule status pursuant to this regulation. All facilities shall be maintained and operated in accordance with the approved design and intended use of the facility.

The facility Operations Plan describes the requirements for on-site storage of asbestos waste at the facility. Under "Allowable Storage Areas", page two of the plan states "the interim transport vehicle area located at the LCM site shall contain two box trailers – one designated for asbestos bags, clearly and permanently labeled "ASBESTOS" in letters at least 3 " high, ..."

Under the section labeled "Additional Requirements," the plan also states in part.... "asbestos bags are to be stored only in the box trailer labeled "ASBESTOS".

Pursuant to 9VAC20-81-620.B, in order for asbestos-containing waste materials to be accepted at the disposal site, these materials shall meet the transporting and packaging requirements for asbestos-containing waste materials according to 40 CFR Part 61, Subpart M, as amended, which is hereby incorporated.

Section 40 CFR Part 61.150, states each owner or operator of any source covered under the provisions of §§61.144, 61.145, 61.146, and 61.147 shall comply with the following provisions:

(a) Discharge no visible emissions to the outside air during the collection, processing (including incineration), packaging, or transporting of any asbestos-containing waste material generated by the source, or use one of the emission control and waste treatment methods specified in paragraphs (a) (1) through (4) of this section.

(iii) After wetting, seal all asbestos-containing waste material in leak-tight containers while wet; or, for materials that will not fit into containers without additional breaking, put materials into leak-tight wrapping; and

(iv) Label the containers or wrapped materials specified in paragraph (a)(1)(iii) of this section using warning labels specified by Occupational Safety and Health Standards of the Department of Labor, Occupational Safety and Health Administration (OSHA) under 29 CFR 1910.1001(j)(4) or 1926.1101(k)(8). The labels shall be printed in letters of sufficient size and contrast so as to be readily visible and legible.

(v) For asbestos-containing waste material to be transported off the facility site, label containers or wrapped materials with the name of the waste generator and the location at which the waste was generated.

(c) Mark vehicles used to transport asbestos-containing waste material during the loading and unloading of waste so that the signs are visible. The markings must conform to the requirements of §§61.149(d)(1) (i), (ii), and (iii).

2. **Observation:** The asbestos waste stored at the facility had been accumulating for over a year. LCM should dispose of the asbestos waste in a more timely manner, in part because friable asbestos, which is required to be stored wet, may begin to dry out if it is stored for a long period

of time. In addition, the regulations require asbestos to be disposed at an authorized waste management facility as soon as practical.

Legal Requirements: Pursuant to 40 CFR 61.150(b), all asbestos-containing waste material shall be deposited as soon as is practical by the waste generator at:

(1) A waste disposal site operated in accordance with the provisions of §61.154, or

(2) An EPA-approved site that converts RACM and asbestos-containing waste material into nonasbestos (asbestos-free) material according to the provisions of §61.155.

- 3. Observation:** During the inspection, facility staff were unable to provide monthly inspection records for the months of March 2020 through September 2020. The last documented self-inspection occurred in February 2020. Facility self-inspections should be conducted in accordance with the minimum frequency described in the Operations Manual.

Legal Requirements: Pursuant to 9VAC20-81-350.1, the facility owner or operator shall record self-inspections in an inspection log. These records shall be retained for at least three years from the date of inspection. They must include the date and time of the inspection, the name of the inspector, a description of the inspection including the identify of specific equipment and structures inspection, the observations recorded, and the date and nature of any remedial actions implemented or repairs made as a result of the inspection.

ENFORCEMENT AUTHORITY

Va. Code § 10.1-1455 of the Waste Management Act provides for an injunction for any violation of the Waste Management Act, Waste Management Board regulations, an order, or permit condition, and provides for a civil penalty up to \$32,500 per day of each violation of the Waste Management Act, regulation, order or permit condition. In addition, Va. Code § 10.1-1455 (G) authorizes the Waste Management Board to issue orders to any person to comply with the Waste Management Act and regulations, including the imposition of a civil penalty for violations of up to \$100,000. Also, Va. Code § 10.1-1186 authorizes the Director of DEQ to issue special orders to any person to comply with the Waste Management Act and regulations. Va. Code §§ 10.1-1455(D) and 10.1-1455(I) provide for other additional penalties.

FUTURE ACTIONS

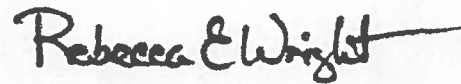
After reviewing this letter, please respond in writing to DEQ **within 30 days** of the date of this letter detailing actions you have taken or will be taking to ensure compliance with state law and regulations. If corrective action will take longer than 90 days to complete, you may be asked to sign a Letter of Agreement or enter into a Consent Order with the Department to formalize the plan and schedule. It is DEQ policy that appropriate, timely, corrective action undertaken in response to a Warning Letter may avoid adversarial enforcement proceedings and the assessment of civil charges or penalties.

Please advise us if you dispute any of the observations recited herein or if there is other information of which DEQ should be aware. In the event that discussions with staff do not lead to a satisfactory conclusion concerning the contents of this letter, you may elect to participate in DEQ's Process for Early Dispute Resolution. Also, if informal discussions do not lead to a satisfactory conclusion, you may request in writing that DEQ take all necessary steps to issue a final decision or fact

finding under the APA on whether or not a violation has occurred. For further information on the Process for Early Dispute Resolution, please see Agency Policy Statement No. 8-2005 posted on the Department's website under "Programs," "Enforcement," and "Laws, Regulations, & Guidance" (<http://www.deq.virginia.gov/Programs/Enforcement/Laws,Regulations,Guidance.aspx>) or ask the DEQ contact listed below.

Your contact at DEQ in this matter is Bobbie S. Crawford. Please direct written materials to her attention. If you have questions or wish to arrange a meeting, you may reach her directly at (540) 562-6727 or bobbie.crawford@deq.virginia.gov.

Sincerely,



Rebecca E. Wright
Environmental Program Planner

Enclosures:
Inspection Checklist

cc: Bobbie S. Crawford, BRRO Solid Waste Compliance Inspector
Nichole Herschler, DEQ-BRRO Land Protection Manager
Priscilla Rohrer, CO Solid Waste Compliance Coordinator
DEQ ECM – PBR #136



Compliance Inspection Report

Inspection Summary

Facility: LCM Corp - Transfer Station Permit: PBR136 Region: Blue Ridge Inspection Type: Compliance Evaluation Inspection Facility Staff: Lawrence Musgrove, President (540) 344-5583	Inspector: Bobbie Crawford Inspection Date: 10/22/2020 Approximate Arrival Time: 09:50 AM Inspection Method: Unannounced Exit Interview: Yes Weather Conditions: Sunny; 61 Degrees F
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Comments: On October 22, 2020, DEQ staff conducted an inspection at LCM Corporation. Mr. Lawrence Musgrove, President, assisted with the inspection which consisted of records review and site tour. The inspection concluded at 10:50 am.

LCM conducts environmental response and asbestos remediation services. The facility holds a Permit-By-Rule (PBR) permit for operating as a transfer station; however, there are currently no transfer operations conducted at the site. When LCM generates asbestos as part of their remediation services, the waste is bagged and brought on site and stored in a labeled container and then periodically hauled off-site.

During the previous inspection, dated February 13, 2020, DEQ staff observed a large volume of empty drums stored outside the permitted wash bay area and a large oil stained area on the ground. The petroleum release was addressed under separate cover, dated April 2, 2020. The letter advised the facility to clean up the petroleum release. On June 8, 2020, the facility provided a certificate of disposal response as corrective action. During this inspection, DEQ staff observed the area had been cleaned and all drums removed.

Transfer Station (Active)

Reference	Description	SL	Result
Compliance Area: Operator Information			
10.1-1408.1	Disclosure Statement	I	✓
10.1-1408.2	Operator Certification	II	✓
Compliance Area: Recordkeeping, Reporting & Permit			
20-81-80	Waste Assessment Program	II	✓
20-81-300.B	Compliance with the facility's permit	II	X
20-81-300.F	Unauthorized waste program and inspection	II	✓
20-81-350	Facility Self-Inspections and Recordkeeping	I	X
20-81-485.B	Operations Manual	I	✓
20-81-530.C	Permittee reporting requirements	II	✓
Compliance Area: Design, Construction & Operation			
20-81-330.B	Facility design / construction	I	✓
20-81-340.B.1-3,5	Waste handling procedures / operations	II	✓
20-81-340.B.4	Management of leachate / washwater	III	✓
20-81-610-660	Special Waste	II	X
Compliance Area: Closure			
20-81-360	Closure requirements	II	N/A

SL = Severity Level ✓ = In Compliance X = Alleged Violation N/A = Not Applicable Blank = Not Inspected

Alleged Violations

Reference	Comments
20-81-300.B	Compliance with the facility's permit - ALLEGED VIOLATION The facility no longer maintains a box trailer for storing asbestos, instead, the asbestos is stored in a container provided by HAM landfill. The container filled with asbestos is hauled off-site for disposal and a new, empty container is provided by HAM. During this inspection, there was no label on the storage container.

	<p>GENERAL COMMENT</p> <p>LCM maintains a Permit-by-Rule dated December 8, 1998. Attachment II FACILITY DESCRIPTION outlines LCM Corporation as a facility involved in environmental services with activities including asbestos and lead paint abatement and emergency response to petroleum and chemical incidents. LCM is currently only active in asbestos abatement. As part of this permit document, the facility maintains an operations plan and under the subsection "Allowable Storage Areas", states in part.... "The interim transport vehicle area located at the LCM site shall contain two box trailers - one designated for asbestos bags, clearly and permanently labeled "ASBESTOS" in letters at least 3" high, and under the subsection "Additional Requirements" also states in part.... "Asbestos bags are to be stored only in the box trailer labeled "ASBESTOS". This requirement was outlined in the PBR as a result of the requirements in section 20-81-620 which incorporates the requirements in 40 CFR Part 61.150 (a) (iv) and (v).</p> <p>All waste stored on-site is generated by LCM projects. When petroleum contaminated soil and other solid wastes are collected, they are sent to HAM landfill when a full load is accumulated. DEQ recommends that the asbestos waste be removed in a more timely manner as the waste is stored wet and if left to sit for long periods of time, the asbestos may become dry, posing a hazard should the bags rupture.</p>
20-81-350	<p>Facility Self-Inspections and Recordkeeping - ALLEGED VIOLATION</p> <p>The facility has outlined in the operations manual that monthly self inspections will be conducted. The last monthly self inspection report available was conducted in February 2020; since that time, no other monthly inspection records were available.</p> <p>Monthly self inspections shall be conducted as outlined in the certified operations manual and appropriate recordkeeping made available for inspection.</p>
20-81-610-660	<p>Special Waste - ALLEGED VIOLATION</p> <p>Asbestos Containing Materials (ACM) are required to be stored at the facility in a labeled and locked container. LCM uses containers provided by HAM landfill for storage of asbestos. During this inspection, DEQ staff observed the container on-site had no visible label nor appropriate signage. The National Emissions Standards for Hazardous Air Pollutants (NESHAP) have been incorporated into section 20-81-620 and are applicable as outlined in section 40 CFR Part 61.150 (a) (iv) and (v).</p> <p>The asbestos material has been stored on-site for over a year. During the records review, the records reflected the last time the asbestos container was shipped off site was on July 5, 2019. Since that time, asbestos was received on the following days and stored in the on-site container:</p> <ul style="list-style-type: none"> August 22, 2019 - 3 bags September 9, 2019 - 58 bags December 7, 2019 - 2 bags December 23, 2019 - 3 bags, one bundle March 3, 2020 - 5 bags May 7, 2020 - 1 bag May 18, 2020 - 16 bags June 8, 2020 - 8 bags August 14, 2020 - 2 bags September 1, 2020 - 40 bags October 21, 2020 - 3 bags

General Comments

Reference	Comments
10.1-1408.1	Disclosure Statement - No changes have been made to the disclosure statement since the previous inspection. The disclosure statement is up-to-date.
10.1-1408.2	Operator Certification - Mr. Lawrence Musgrove is the licensed operator for the facility and the license was renewed with an expiration date of 4/30/2021.
20-81-485.B	Operations Manual - The facility maintains an operations manual which was last certified on December 30, 2019. The manual includes a facility operating plan, contingency/emergency plan, leachate and wash water procedures and unauthorized waste procedures.
20-81-340.B.1-3,5	Waste handling procedures / operations - The facility stores non-friable asbestos on-site. The asbestos is stored in a labeled and locked container provided by HAM landfill. During the inspection, the container was not labeled. Asbestos had not been shipped off-site since July 5, 2019. Some of the asbestos has remained on-site for over a year.
20-81-340.B.4	Management of leachate / washwater - No leachate is generated by the facility at this time. All waste is stored in containers and in enclosed structures or vehicles.

Disclosure Statement Details

Key Personnel**Title**

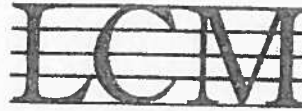
Dalton E. Thompson, Jr.	
Lawrence A. Logan	
Lawrence C. Musgrove, III	

Waste Management Facility Operators**Licensed Operator****License #****Expiration Date**

Lawrence C. Musgrove III	4605 001895	4/30/2021
--------------------------	-------------	-----------

PLEASE advise the Regional Office within 10 calendar days if any information noted in this report is incorrect, if you have taken appropriate action to meet compliance, or if there is other information that the department should consider regarding any alleged violations.

PLEASE be advised that this report is not an agency proceeding or determination which may be considered a case decision under the Administrative Process Act (VA Code 2.2-4000 et seq). If informal discussions do not lead to a satisfactory conclusion on the contents of this report, you may request in writing that DEQ take all necessary steps to issue a final decision or fact finding under the APA on whether or not a violation has occurred.



CORPORATION

Environmental Services

January 15, 2021

Commonwealth of Virginia
Department of Environmental Quality
Blue Ridge Regional Office
901 Russell Drive
Salem, VA 24153
Attention:
Ms. Bobbie S. Crawford
Solid Waste Compliance Inspector
Email: bobbie.crawford@deq.virginia.gov

**RE: LCM Corporation – Permit-By-Rule (PBR) #136
Unannounced compliance inspection – October 22, 2020
Letter of Response to Warning Letter**

Sent Via Electric Mail

Ms. Crawford,

Pursuant to Ms. Rebecca E. Wright's Warning Letter dated December 17, 2020, LCM Corporation has addressed the following noted items:

- Item 1: The Asbestos Warning Sign that was missing from the container noted pursuant to your inspection of October 22, 2020 was replaced on the container that date,
- Item 2: The container of Asbestos located at LCM Corporation was sent to Ham Landfill for disposal December 18, 2020. A copy of the invoice for the service is enclosed for reference.
- Item 3: The noted monthly inspection records have been placed in the inspection log.

If you should need any further information, or have any questions, please contact me at 540.344.5583.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lawrence C. Musgrove III'. The signature is written in a cursive, flowing style.

Lawrence C. Musgrove III
President



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

BLUE RIDGE REGIONAL OFFICE

901 Russell Drive, Salem, Virginia 24153

(540) 562-6700 FAX (804) 698-4178

www.deq.virginia.gov

Matthew J. Strickler
Secretary of Natural and Historic Resources

David K. Paylor
Director
(804) 698-4000

Robert J. Weld
Regional Director

Sent by electronic mail

July 21, 2021

Mr. Lawrence C. Musgrove III
President
PO Box 13487
Roanoke, Virginia 24034
lmusgrove@musgroveassoc.com

NO DEFICIENCY LETTER

Re: LCM Corporation – PBR136
Announced compliance inspection – July 15, 2021

Dear Mr. Musgrove:

On July 15, 2021, staff from the Virginia Department of Environmental Quality's Blue Ridge Regional Office conducted a compliance inspection of the solid waste management facility operating under PBR136. During this inspection, the facility was evaluated for compliance with the Virginia Waste Management Act, Va. Code § 10.1-1400 *et seq.* ("Act"), the Virginia Solid Waste Management Regulations, 9VAC20-81-10 *et seq.* ("Regulations"), and PBR136.

During the inspection, no apparent violations of the Act, Regulations, or PBR136 were observed. A copy of the inspection checklist is enclosed.

If you have any questions, please contact me at (540) 562-6727 or bobbie.crawford@deq.virginia.gov.

Sincerely,

Bobbie S. Crawford
Solid Waste Compliance Inspector

cc: DEQ ECM – PBR136



Compliance Inspection Report

Inspection Summary

Facility: LCM Corp - Transfer Station
Permit: PBR136
Region: Blue Ridge
Inspection Type: Compliance Evaluation Inspection
Facility Staff: Mr. Lawrence C. Musgrove III, President

Inspector: Bobbie Crawford
Inspection Date: 7/15/2021
Approximate Arrival Time: 1:12 pm
Inspection Method: Announced
Exit Interview: Yes
Weather Conditions: Partly Cloudy, 88 Degrees F.

Comments: On July 15, 2021, DEQ staff conducted an inspection at LCM Corporation. Mr. Lawrence Musgrove, President, assisted with the inspection which consisted of a records review and site tour. The inspection concluded at 2:10 pm.

LCM conducts environmental response and asbestos remediation services. The facility holds a Permit-By-Rule (PBR) permit for operating as a transfer station; however, there are currently no transfer operations conducted at the site. When LCM generates asbestos as part of their remediation services, the waste is bagged and brought on site and stored in a labeled container and then periodically hauled off-site.

Transfer Station (Active)

Reference	Description	SL	Result
Compliance Area: Operator Information			
10.1-1408.1	Disclosure Statement	I	✓
10.1-1408.2	Operator Certification	II	✓
Compliance Area: Recordkeeping, Reporting & Permit			
20-81-80	Waste Assessment Program	II	✓
20-81-300.B	Compliance with the facility's permit	II	✓
20-81-300.F	Unauthorized waste program and inspection	II	✓
20-81-350	Facility Self-Inspections and Recordkeeping	I	✓
20-81-485.B	Operations Manual	I	✓
20-81-530.C	Permittee reporting requirements	II	✓
Compliance Area: Design, Construction & Operation			
20-81-330.B	Facility design / construction	I	✓
20-81-340.B.1-3,5	Waste handling procedures / operations	II	✓
20-81-340.B.4	Management of leachate / washwater	III	✓
20-81-610-660	Special Waste	II	✓
Compliance Area: Closure			
20-81-360	Closure requirements	II	N/A

SL = Severity Level ✓ = In Compliance X = Alleged Violation N/A = Not Applicable Blank = Not Inspected

General Comments

Reference	Comments
10.1-1408.1	Disclosure Statement - No changes have been made to the disclosure statement since the previous inspection. The disclosure statement is up-to-date.
10.1-1408.2	Operator Certification - Mr. Lawrence Musgrove is the licensed operator for the facility and the license was renewed with an expiration date of 4/30/2023.
20-81-80	Waste Assessment Program - LCM submitted the 2020 SWIA report on March 30, 2021. The report was submitted within the required time line.
20-81-300.B	Compliance with the facility's permit - The facility appeared to be in compliance with the permit.

20-81-300.F	<p>Unauthorized waste program and inspection - Only LCM generated waste is received at the transfer station, as such, all waste entering the facility is known prior to arrival.</p> <p>The facility has an unauthorized waste control plan in the Operations Manual.</p> <p>Signs posted near the trailers and container list accepted and unaccepted waste.</p>
20-81-350	<p>Facility Self-Inspections and Recordkeeping - Mr. Musgrove conducts monthly inspections. Records were reviewed for the period of November 2020 through June 2021 and there were no compliance issues noted. The December inspection log noted that on December 28, 2020, the asbestos container located on site, had been picked up for disposal by HAM and an empty, labeled, container was replaced which was observed during the inspection.</p>
20-81-485.B	<p>Operations Manual - The facility operations manual was re-certified on December 31, 2020.</p>
20-81-530.C	<p>Permittee reporting requirements - There have been no occurrences which would have required a notification to the Department since the previous inspection.</p>
20-81-330.B	<p>Facility design / construction - Waste is stored in three containers located within the designated waste management areas described in the facility's PBR. One closed, locked container supplied by HAM landfill contains friable asbestos. Currently, the asbestos is being collected at job sites, bagged and stored in this container. LCM has two other containers (one trailer and one box truck) which infrequently stores nonhazardous media in sealed containers.</p>
20-81-340.B.1-3,5	<p>Waste handling procedures / operations - All waste stored on-site is generated by LCM projects. When petroleum contaminated soil and other solid wastes are collected, they are sent to HAM landfill when a full load is accumulated. LCM staff indicated such waste was collected in January and April 2021. The log records show that disposal took place May 1, 2021.</p>
20-81-340.B.4	<p>Management of leachate / washwater - No leachate is generated by the facility at this time. All waste is stored in containers and in enclosed structures or vehicles.</p>
20-81-610-660	<p>Special Waste - Asbestos Containing Materials (ACM) are stored at the facility in a labeled and locked container provided by HAM landfill. The container is removed approximately twice per year and transported to Peterstown, WV, where the ACM is disposed. The facility maintains records of asbestos received and shipped, which were reviewed during the inspection. Asbestos was shipped on December 18, 2020.</p>

Disclosure Statement Details

Key Personnel	Title
Dalton E. Thompson, Jr.	
Lawrence A. Logan	
Lawrence C. Musgrove, III	

Waste Management Facility Operators

Licensed Operator	License #	Expiration Date
Lawrence C. Musgrove III	4605001895	4/30/2023

PLEASE advise the Regional Office within 10 calendar days if any information noted in this report is incorrect, if you have taken appropriate action to meet compliance, or if there is other information that the department should consider regarding any alleged violations.

PLEASE be advised that this report is not an agency proceeding or determination which may be considered a case decision under the Administrative Process Act (VA Code 2.2-4000 et seq). If informal discussions do not lead to a satisfactory conclusion on the contents of this report, you may request in writing that DEQ take all necessary steps to issue a final decision or fact finding under the APA on whether or not a violation has occurred.



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

1111 E. Main Street, Suite 1400, Richmond, Virginia 23219

P.O. Box 1105, Richmond, Virginia 23218

(800) 592-5482 FAX (804) 698-4178

www.deq.virginia.gov

Matthew J. Strickler
Secretary of Natural and Historic Resources

David K. Paylor
Director
(804) 698-4000

July 6, 2021

VIA ELECTRONIC MAIL

Mr. Lawrence C. Musgrove, III
President
LCM Corporation
Post Office Box 13487
Roanoke, Virginia 24034

RE: Solid Waste Financial Assurance Demonstration
LCM Corporation Transfer Station, Permit-by-Rule (PBR) Number 136

Dear Mr. Musgrove:

The Virginia Department of Environmental Quality (the Department) has completed its review of the documentation submitted by LCM Corporation (the Company) to demonstrate financial assurance for the closure costs associated with the above referenced solid waste facility as required by the Virginia Financial Assurance Regulations for Solid Waste Disposal, Transfer, and Treatment Facilities, 9 VAC 20-70 (the Regulation). This documentation has been prepared in accordance with the Regulation.

The Company has an approved closure cost estimate totaling \$6,182 and financial assurance in the amount of \$6,194 in the form of a certificate of deposit with Union Bank and Trust. In the event the technical cost estimate increases before the next review date of June 25, 2022, the Company may be required to increase the amount of financial assurance.

Please note that the obligation to demonstrate financial assurance is an annual one and the Company must update the cost estimate and financial assurance mechanism annually for inflation. You may call the Office of Financial Responsibility and Waste Programs at (804) 698-4067 sixty days prior to the review date to obtain the 2022 inflation factor. Your anniversary date is **June 25th**.

You may contact me at (804) 698-4067 or ronnie.calkins@deq.virginia.gov if you have any questions or require assistance. Thank you for your time and consideration in this matter.

Sincerely,

A handwritten signature in black ink that reads "Ronnie Calkins".

Ronnie Calkins
Office of Financial Responsibility & Waste Programs

cc: DEQ/WPC Common
DEQ/ECM



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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www.deq.virginia.gov

Travis A. Voyles
Acting Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus
Director
(804) 698-4020

August 25, 2022

VIA ELECTRONIC AND REGULAR U.S. MAIL

Mr. Lawrence C. Musgrove, III

President

LCM Corporation

Post Office Box 13487

Roanoke, Virginia 24034

DEFICIENCY LETTER

**RE: Solid Waste Financial Assurance Requirements
LCM Corporation Transfer Station, Permit-by-Rule (PBR) Number 136**

Dear Mr. Musgrove:

The Virginia Department of Environmental Quality's Office of Financial Responsibility and Waste Programs conducted a compliance review of the solid waste management facility operating under PBR 136. During this review, the facility was evaluated for compliance with the Virginia Waste Management Act, Va. Code § 10.1-1400 *et seq.* ("Act") and the Virginia Financial Assurance Regulations for Solid Waste Disposal, Transfer and Treatment Facilities, 9VAC 20-70-10 *et seq.* ("Regulations").

Based on observations and documents obtained during this review, the Department has reason to believe that the LCM Corporation Transfer Station Facility (the Facility) may be in violation of the Act, Regulations. This information is summarized below:

1. *Observations:* The obligation to demonstrate financial assurance is an annual one. During the active life and during the post-closure period of each facility, permitted solid waste facilities are required annually to update cost estimates for inflation and submit their preferred mechanism to the Department. The Facility has not yet

submitted an updated financial assurance demonstration for 2022. The anniversary date of the submission was June 25, 2022. The inflation factor for 2022 is 1.046 and the amount of financial assurance required for this year totals \$6,467 for the Facility; the CD you have on file with the Department totals \$6,194.

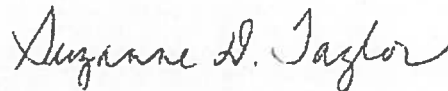
2. *Legal Requirements:* The applicable regulatory provision is found in **9VAC20-70-111** through **9VAC20-70-113**.

Please advise this office in writing within **30 calendar days** of receipt of this letter if your facility has taken or intends to take corrective action to address these issues, or if there is other information that DEQ should consider. A schedule should be provided for any intended actions.

Pursuant to Va. Code § 10.1-1455(G), this letter is not a case decision under the Virginia Administrative Process Act, Va. Code § 2.2-4000 *et seq.* ("APA").

If you have any questions, please contact me at (804) 659-1533 or via email at Suzanne.Taylor@deq.virginia.gov. Thank you for your time and consideration in this matter.

Sincerely,



Suzanne D. Taylor
Office of Financial Responsibility & Waste Programs

cc: DEQ/ WPC Common
ECM/ PBR 136



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

1111 E. Main Street, Suite 1400, Richmond, Virginia 23219

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Travis A. Voyles
Acting Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus
Director
(804) 698-4020

November 1, 2022

VIA ELECTRONIC MAIL

Mr. Lawrence C. Musgrove, III
President
LCM Corporation
Post Office Box 13487
Roanoke, Virginia 24034

RE: Solid Waste Financial Assurance Demonstration
LCM Corporation Transfer Station, Permit-by-Rule (PBR) Number 136

Dear Mr. Musgrove:

The Virginia Department of Environmental Quality (the Department) has completed its review of the documentation submitted by LCM Corporation (the Company) to demonstrate financial assurance for the closure costs associated with the above referenced solid waste facility as required by the Virginia Financial Assurance Regulations for Solid Waste Disposal, Transfer, and Treatment Facilities, 9 VAC 20-70 (the Regulation). This documentation has been prepared in accordance with the Regulation.

The Company has an approved closure cost estimate totaling \$6,467 and financial assurance in the amount of \$6,694 in the form of a certificate of deposit with Atlantic Union Bank. In the event the technical cost estimate increases before the next review date of June 25, 2023, the Company may be required to increase the amount of financial assurance.

Please note that the obligation to demonstrate financial assurance is an annual one and the Company must update the cost estimate and financial assurance mechanism annually for inflation. You may call the Office of Financial Responsibility and Waste Programs at (804) 350-9962 sixty days prior to the review date to obtain the 2023 inflation factor. Your anniversary date is **June 25th**.

You may contact me at (804) 350-9962 or Carlos.Martinez@DEQ.Virginia.Gov if you have any questions or require assistance. Thank you for your time and consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Carlos A. Martinez".

Carlos A. Martinez
Virginia Department of Environmental Quality

Cc: DEQ / WPC Commons / ECM / Suzanne Taylor, DEQ



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

1111 E. Main Street, Suite 1400, Richmond, Virginia 23219

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Travis A. Voyles
Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus
Director
(804) 698-4020

December 4, 2023

VIA ELECTRONIC MAIL

Mr. Lawrence C. Musgrove, III
President
LCM Corporation
Post Office Box 13487
Roanoke, Virginia 24034

RE: Solid Waste Financial Assurance Demonstration
LCM Corporation Transfer Station, Permit-by-Rule (PBR) Number 136

Dear Mr. Musgrove:

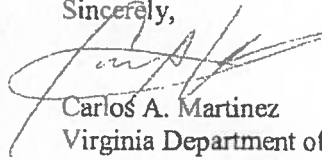
The Virginia Department of Environmental Quality (the Department) has completed its review of the documentation submitted by LCM Corporation (the Company) to demonstrate financial assurance for the closure costs associated with the above referenced solid waste facility as required by the Virginia Financial Assurance Regulations for Solid Waste Disposal, Transfer, and Treatment Facilities, 9 VAC 20-70 (the Regulation). This documentation has been prepared in accordance with the Regulation.

The Company has an approved closure cost estimate totaling \$6,926 and financial assurance in the same amount in the form of a certificate of deposit with Atlantic Union Bank. In the event the technical cost estimate increases before the next review date of June 25, 2024, the Company may be required to increase the amount of financial assurance.

Please note that the obligation to demonstrate financial assurance is an annual one and the Company must update the cost estimate and financial assurance mechanism annually for inflation and submit the increased financial assurance mechanism to the Department by June 25. The inflation factor for 2024 is **1.033** and the facility's anniversary date is **June 25**.

You may contact me at (804) 350-9962 or Carlos.Martinez@DEQ.Virginia.Gov if you have any questions or require assistance. Thank you for your time and consideration in this matter.

Sincerely,



Carlos A. Martinez

Virginia Department of Environmental Quality

cc: Suzanne Taylor, DEQ
DEQ/WPCommon Drive
DEQ/ECM



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

1111 E. Main Street, Suite 1400, Richmond, Virginia 23219

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www.deq.virginia.gov

Travis A. Voyles
Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus
Director
(804) 698-4020

August 8, 2023

VIA ELECTRONIC AND REGULAR U.S. MAIL

Mr. Lawrence C. Musgrove, III

President

LCM Corporation

Post Office Box 13487

Roanoke, Virginia 24034

DEFICIENCY LETTER

**RE: Solid Waste Financial Assurance Requirements
LCM Corporation Transfer Station, Permit-by-Rule (PBR) Number 136**

Dear Mr. Musgrove:

The Virginia Department of Environmental Quality's Office of Financial Responsibility and Waste Programs conducted a compliance review of the solid waste management facility operating under PBR 136. During this review, the facility was evaluated for compliance with the Virginia Waste Management Act, Va. Code § 10.1-1400 *et seq.* ("Act") and the Virginia Financial Assurance Regulations for Solid Waste Disposal, Transfer and Treatment Facilities, 9VAC 20-70-10 *et seq.* ("Regulations").

Based on observations and documents obtained during this review, the Department has reason to believe that the LCM Corporation Transfer Station Facility (the Facility) may be in violation of the Act, Regulations. This information is summarized below:

1. *Observations:* The obligation to demonstrate financial assurance is an annual one. During the active life and during the post-closure period of each facility, permitted solid waste facilities are required annually to update cost estimates for inflation and submit their preferred mechanism to the Department. The Facility has not yet

submitted an updated financial assurance demonstration for 2023. The anniversary date of the submission was June 25, 2023. The inflation factor for 2023 is 1.071 and the amount of closure financial assurance required for this year totals \$6,926 for the Facility; the CD you have on file with the Department totals \$6,694.

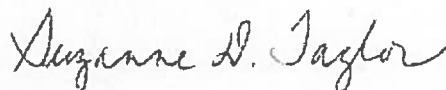
2. *Legal Requirements:* The applicable regulatory provision is found in **9VAC20-70-111** through **9VAC20-70-113**.

Please advise this office in writing within **30 calendar days** of receipt of this letter if your facility has taken or intends to take corrective action to address these issues, or if there is other information that DEQ should consider. A schedule should be provided for any intended actions.

Pursuant to Va. Code § 10.1-1455(G), this letter is not a case decision under the Virginia Administrative Process Act, Va. Code § 2.2-4000 *et seq.* ("APA").

If you have any questions, please contact me at (804) 659-1533 or via email at Suzanne.Taylor@deq.virginia.gov. Thank you for your time and consideration in this matter.

Sincerely,



Suzanne D. Taylor
Office of Financial Responsibility & Waste Programs

cc: DEQ/WPC Common
ECM/ PBR 136

SUPPLEMENTAL SOLID WASTE INFORMATION AND ASSESSMENT PROGRAM REPORTING TABLE - FORM DEQ 50-25

Only those facilities that landfill Virginia Incineration ash provide this information.

Permit No. Facility Name	Ash Amount	Unit of Measure
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Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

BLUE RIDGE REGIONAL OFFICE

901 Russell Drive, Salem, Virginia 24153

(540) 562-6700

www.deq.virginia.gov

Travis A. Voyles
Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus
Director
(804) 698-4020

Robert J. Weld
Regional Director

February 21, 2024

VIA ELECTRONIC MAIL

Mr. Lawrence C. Musgrove III
President
LCM Corporation
P.O. Box 13487
Roanoke, VA 24034
lmusgrove@musgroveassoc.com

NO DEFICIENCY LETTER

Subject: LCM Corporation Transfer Station – 3321 Shenandoah Avenue NW, Roanoke, Virginia
Permit-by-Rule (PBR) 136

Dear Mr. Musgrove,

On January 31, 2024, the Virginia Department of Environmental Quality Blue Ridge Regional Office staff conducted a compliance inspection of the solid waste management facility operating under PBR136. During this inspection, the facility was evaluated for compliance with the Virginia Waste Management Act, Va. Code § 10.1-1400 *et seq.* (Act), the Virginia Solid Waste Management Regulations, 9 VAC 20-81-10 *et seq.* (Regulations), and PBR136

During the inspection, no apparent violations of the Act, Regulations, or PBR136 were observed. A copy of the inspection checklist is enclosed.

If you have any questions, please contact me at (540) 597-6585 or nicole.tilley@deq.virginia.gov.

Sincerely,

A handwritten signature in black ink that reads "Nicole Tilley".

Nicole Tilley
BRRO Solid Waste Compliance Inspector

Attachment: Compliance Inspection Report

LCM Corporation Transfer Station – PBR136
February 21, 2024
Page 2 of 2

CC: *(via email)*
Nichole Herschler, DEQ BRRO Land Protection Program Manager,
nichole.herschler@deq.virginia.gov
ECM – PBR136



Compliance Inspection Report

Inspection Summary

Facility: LCM Corp - Transfer Station
Permit: PBR136
Region: Blue Ridge
Inspection Type: Compliance Evaluation Inspection
Facility Staff: Mr. Lawrence C. Musgrove III, President

Inspector: Nicole Tilley
Inspection Date: 1/31/2024
Approximate Arrival Time: 8:50 a.m.
Inspection Method: Announced
Exit Interview: Yes
Weather Conditions: The weather was cloudy with temperatures averaging 40F. Ground conditions were damp.

Comments: On January 31, 2024, DEQ conducted an announced compliance inspection of LCM Corporation Transfer Station. The inspection consisted of a tour of the facility and exit interview. Records were reviewed electronically after the inspection. Mr. Musgrove assisted in the inspection and DEQ departed at approximately 9:15 a.m.

Transfer Station (Active)

Reference	Description	SL	Result
Compliance Area: Operator Information			
10.1-1408.1	Disclosure Statement	I	✓
10.1-1408.2	Operator Certification	II	✓
Compliance Area: Recordkeeping, Reporting & Permit			
20-81-80	Waste Assessment Program	II	✓
20-81-300.B	Compliance with the facility's permit	II	✓
20-81-300.F	Unauthorized waste program and inspection	II	✓
20-81-350	Facility Self-Inspections and Recordkeeping	I	✓
20-81-485.B	Operations Manual	I	✓
20-81-530.C	Permittee reporting requirements	II	✓
Compliance Area: Design, Construction & Operation			
20-81-330.B	Facility design / construction	I	✓
20-81-340.B.1-3,5	Waste handling procedures / operations	II	✓
20-81-340.B.4	Management of leachate / washwater	III	✓
20-81-610-660	Special Waste	II	✓
Compliance Area: Closure			
20-81-360	Closure requirements	II	N/A

SL = Severity Level ✓ = In Compliance X = Alleged Violation N/A = Not Applicable Blank = Not Inspected

General Comments

Reference	Comments
10.1-1408.1	Disclosure Statement - - The disclosure statement was up to date with no necessary changes needed.
10.1-1408.2	Operator Certification - - Mr. Lawrence Musgrove is the licensed operator for the facility. His operator's license is up to date.
20-81-80	Waste Assessment Program - - The SWIA report for the 2022 calendar year was submitted on March 31, 2022. The SWIA report for the 2023 calendar year is due by March 31, 2024.
20-81-300.B	Compliance with the facility's permit - - LCM Corporation is an environmental services company which is involved in activities such as asbestos and lead paint abatement, and emergency response to petroleum and chemical incidents. The facility is permitted to accept nonhazardous waste. All materials are stored in roll-off containers, drums, or other sealed containers. Asbestos waste is properly bagged.

20-81-300.F	<p>Unauthorized waste program and inspection - - No unauthorized waste was observed at the facility. Only LCM generated waste is received at the transfer station; as such, all waste entering the facility is known prior to arrival.</p> <p>During the inspection, DEQ observed three 55-gallon drums of paint chips that were generated from the Radford Army Ammunition Plant. After the inspection, the manifest and analytical results were provided for review. Based on the analytical report, the paint chips appeared to be non-hazardous. DEQ recommends using non-hazardous waste labels to identify waste that are brought back to the transfer station.</p>
20-81-350	<p>Facility Self-Inspections and Recordkeeping - - The facility maintains records of waste materials received and shipped, which were reviewed after the inspection.</p>
20-81-485.B	<p>Operations Manual - - The facility's operations manual was re-certified on December 31, 2023, by Mr. Lawrence C. Musgrove III, President.</p>
20-81-530.C	<p>Permittee reporting requirements - - The facility did not have an event that required a 24-hour verbal or 5-day written notification.</p>
20-81-330.B	<p>Facility design / construction - -</p> <ol style="list-style-type: none"> 1. The road from the entrance gate to the receiving bay is suitable for vehicles carrying waste. 2. The facility is provided with a source of water for area cleaning. Wash down will only be performed to clean spills or other situations that cannot be adequately addressed by dry cleanup. 3. Tipping operations are not conducted at the facility. All waste is brought to the transfer station in drums or other sealed containers. 4. The receiving bay is constructed of concrete that can be easily cleaned. 5. The location provides ample on-site access road for sufficient queuing capacity. There was plenty of area for waiting, turning, and maneuvering all types of vehicles. 6. The facility does not host household hazardous waste collections. 7. There were no issues regarding blown litter, dust, odors, or vectors at the transfer station.
20-81-340.B.1-3,5	<p>Waste handling procedures / operations - - All waste stored on-site is generated by LCM projects. When petroleum contaminated material, asbestos, and other solid wastes are collected, they are sent to HAM landfill when a full load is accumulated.</p>
20-81-340.B.4	<p>Management of leachate / washwater - - No leachate is generated at the facility. All waste are stored in containers and in enclosed structures or vehicles.</p>
20-81-610-660	<p>Special Waste - - Asbestos Containing Materials (ACM) are stored at the facility in a container provided by HAM landfill. During the inspection, the labeled on the container had fallen off and the lock was missing. Facility personnel should reapply the label and replace the lock on the container.</p> <p>Petroleum Contaminated Materials (PCM) are stored at the facility in 55-gallon drums that are closed and labeled. The drums are transported off-site by Environmental Options. During the inspection, there were no PCM containers on-site.</p>
20-81-360	<p>Closure requirements - - PBR136 is an active permit and is not currently seeking closure.</p>

Disclosure Statement Details

Key Personnel	Title
Dalton E. Thompson, Jr.	Senior Project Manager
Lawrence A. Logan	Special Operations Manager
Lawrence C. Musgrove, III	President

Waste Management Facility Operators

Licensed Operator	License #	Expiration Date
Lawrence C. Musgrove III	4605001895	4/30/2025

PLEASE advise the Regional Office within 10 calendar days if any information noted in this report is incorrect, if you have taken

appropriate action to meet compliance, or if there is other information that the department should consider regarding any alleged violations.

PLEASE be advised that this report is not an agency proceeding or determination which may be considered a case decision under the Administrative Process Act (VA Code 2.2-4000 et seq). If informal discussions do not lead to a satisfactory conclusion on the contents of this report, you may request in writing that DEQ take all necessary steps to issue a final decision or fact finding under the APA on whether or not a violation has occurred.



1941 Reymet Road • Richmond, Virginia 23237 • Tel: (804)-358-8295 Fax: (804)-358-8297

Certificate of Analysis

Final Report

Laboratory Order ID 23J1409

Client Name:	BAE Systems, Inc. - RFAAP	Date Received:	October 27, 2023 13:45
	Route 114	Date Issued:	November 3, 2023 16:51
	Radford, VA 24141	Project Number:	[none]
Submitted To:	Andy Wirt	Purchase Order:	RFAC-032621-01-RLL
Client Site I.D.:	RFAAP		

Enclosed are the results of analyses for samples received by the laboratory on 10/27/2023 13:45. If you have any questions concerning this report, please feel free to contact the laboratory.

Sincerely,

A handwritten signature in black ink that reads 'Ted Soyars'.

Ted Soyars
Technical Director

End Notes:

The test results listed in this report relate only to the samples submitted to the laboratory and as received by the Laboratory.

Unless otherwise noted, the test results for solid materials are calculated on a wet weight basis. Analyses for pH, dissolved oxygen, temperature, residual chlorine and sulfite that are performed in the laboratory do not meet NELAC requirements due to extremely short holding times. These analyses should be performed in the field. The results of field analyses performed by the Sampler included in the Certificate of Analysis are done so at the client's request and are not included in the laboratory's fields of certification nor have they been audited for adherence to a reference method or procedure.

The signature on the final report certifies that these results conform to all applicable NELAC standards unless otherwise specified. For a complete list of the Laboratory's NELAC certified parameters please contact customer service.

This report shall not be reproduced except in full without the expressed and written approval of an authorized representative of Enthalpy Analytical.



TNI Accredited
VELAP ID 460021



1941 Reymet Road • Richmond, Virginia 23230 • Tel: (804)-358-8295 Fax: (804)-358-8297

Certificate of Analysis

Final Report

Client Name: BAE Systems, Inc. - RFAAP
Route 114

Date Issued: November 03, 2023 16:51
Project Number: [none]
Purchase Order: RFAC-032621-01-RLL

Submitted To: Radford VA, 24141
Andy Wirt
Client Site I.D.: RFAAP

ANALYTICAL REPORT FOR SAMPLES

Laboratory Order ID 23J1409

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
4908 Paint Chips	23J1409-01	Solids	10/25/2023 13:40	10/27/2023 13:45
3692 Paint Chips	23J1409-02	Solids	10/25/2023 13:50	10/27/2023 13:45



1941 Reymet Road • Richmond, Virginia 23230 • Tel: (804)-358-8295 Fax: (804)-358-8297

Certificate of Analysis

Final Report

Client Name: BAE Systems, Inc. - RFAAP
Route 114

Date Issued: November 03, 2023 16:51

Project Number: [none]

Purchase Order: RFAC-032621-01-RLL

Submitted To: Radford VA, 24141
Andy Wirt
Client Site I.D.: RFAAP

Laboratory Order ID: 23J1409

Analytical Results

Sample I.D. 4908 Paint Chips

Laboratory Sample ID: 23J1409-01

Grab Date/Time: 10/25/2023 13:40

Field Residual Cl:

Field pH:

Parameter	Samp ID	Method	Result	Qual	Reporting Limit	D.F.	Sample Prep Date/Time	Analysis Date/Time	Analyst
TCLP Metals by 6000/7000 Series Methods									
TCLP Silver	01	SW6010D	<0.100 mg/L		0.100	1	10/31/23 09:41	10/31/23 15:18	ACM
TCLP Arsenic	01	SW6010D	<0.100 mg/L		0.100	1	10/31/23 09:41	10/31/23 15:18	ACM
TCLP Barium	01	SW6010D	<5.00 mg/L		5.00	1	10/31/23 09:41	10/31/23 15:18	ACM
TCLP Cadmium	01	SW6010D	0.0470 mg/L		0.0400	1	10/31/23 09:41	10/31/23 15:18	ACM
TCLP Chromium	01	SW6010D	<0.100 mg/L		0.100	1	10/31/23 09:41	10/31/23 15:18	ACM
TCLP Mercury	01	SW7470A	<0.008 mg/L		0.008	1	10/31/23 10:15	10/31/23 15:50	SGT
TCLP Lead	01	SW6010D	0.176 mg/L		0.100	1	10/31/23 09:41	10/31/23 15:18	ACM
TCLP Selenium	01	SW6010D	<0.250 mg/L		0.250	1	10/31/23 09:41	10/31/23 15:18	ACM
TCLP Extraction Fluid, Metals	01	SW1311	1 #		-	1	10/30/23 16:00	10/30/23 16:00	KLJ
TCLP Semivolatile Organic Compounds									
TCLP Extraction Fluid, SV Organics	01	SW1311	1 #		-	1	10/30/23 16:00	10/31/23 10:03	JJB
TCLP Organochlorine Pesticides and PCBs by GC/ECD									
TCLP PCB as Aroclor 1016	01	SW8082A	<0.050 mg/L		0.050	1	11/02/23 13:00	11/03/23 10:45	ADG
TCLP PCB as Aroclor 1221	01	SW8082A	<0.050 mg/L		0.050	1	11/02/23 13:00	11/03/23 10:45	ADG
TCLP PCB as Aroclor 1232	01	SW8082A	<0.050 mg/L		0.050	1	11/02/23 13:00	11/03/23 10:45	ADG
TCLP PCB as Aroclor 1242	01	SW8082A	<0.050 mg/L		0.050	1	11/02/23 13:00	11/03/23 10:45	ADG
TCLP PCB as Aroclor 1248	01	SW8082A	<0.050 mg/L		0.050	1	11/02/23 13:00	11/03/23 10:45	ADG
TCLP PCB as Aroclor 1254	01	SW8082A	<0.050 mg/L		0.050	1	11/02/23 13:00	11/03/23 10:45	ADG
TCLP PCB as Aroclor 1260	01	SW8082A	<0.050 mg/L	L	0.050	1	11/02/23 13:00	11/03/23 10:45	ADG
Surr: DCB	01	SW8082A	65.6 %		30-105		11/02/23 13:00	11/03/23 10:45	ADG
Surr: TCMX	01	SW8082A	95.5 %		30-105		11/02/23 13:00	11/03/23 10:45	ADG