

VDOT-VDEQ Solid Waste MOA Implementation Guide

This guide is intended to provide the VDOT Maintenance staff with a summary of the key requirements in the “*Memorandum of Agreement Virginia Department of Environmental Quality and Virginia Department of Transportation on Solid Waste*” and to assist with implementation of the requirements on Maintenance Projects.

Non-inert Debris

Animal Carcasses

- Animal carcasses may be buried within the right-of-way, in the vicinity of where they are found.
- Burial is limited to individual large carcasses (deer) or several small carcasses (dogs, cats, etc.) and must be conducted at random locations near where they are found. Mass burial is not permitted.
- Document the location of burial and maintain records for 3-years.
- Burial at VDOT facilities or staging areas is not permitted.
- Burial should be below surface grade but not be within the water table, near a stream, or near a source of drinking water.
- Adequate cover is required to prevent disinterment by scavengers.
- Lime or other vector stabilizing agents (such as wood ash) may be added to reduce pathogens.
- Carcass burial within the right-of-way should be the final disposal option after considering: 1) composting, 2) rendering, 3) landfilling, and 4) incineration.

Vegetative Waste

- On-site burial is the last management option for consideration after: 1) beneficial reuse (such as mulch and for erosion control), 2) burning per regulations and MOUs, and 3) landfill disposal.
- On-site burial of vegetative waste is limited to brush, tree prunings, wood chips etc. It does not include stumps, tree trunks etc.
- On-site burial is limited to highway property, right-of-way, or easements of the project where the vegetative waste is generated.
- The duration of disposal operations at one site is limited to 180-days. If the operation is idle for greater than 30-days interim soil cover is required. Vegetative cover is required when the operation is complete.
- Final grade should be 3:1 or greater.
- In addition to burial, wood chips may be broadcast back onto the area of vegetation removal.

Inert Debris

- Only the following inert debris may be disposed on VDOT property, right-of-way, easements, or property of a consenting private property owner: gravel, sand, broken concrete, asphalt, brick, stone, and soil.
- No cover is required except to control erosion.
- Operation should be conducted in such a manner, and appropriate measures implemented, so as not to create an open dump, hazard, public nuisance, or promote illegal dumping.

General Requirements

Illegal Dumping

- VDOT will make reasonable efforts to prevent dumping on its property
- If appropriate or necessary signs, berms, fence, etc. will be erected.
- VDOT will assist DEQ and law enforcement to investigate illegal dumping.
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Contractor use of the MOA

- At VDOT's discretion, VDOT contractors may be allowed to use provisions of this MOA during VDOT projects and VDOT will oversee contractor compliance with the MOA.
- VDOT contractors shall not transport solid waste from one project to another for disposal.

Corrective Action

- VDOT shall be responsible for any corrective action requirements, if necessary, resulting from materials disposed of in accordance with the MOA.

References

1. Joint VDOT/VDEQ Solid Waste MOA