AVOGADRO Environmental Corporation

Clean Air and Water, for Today and Tomorrow

September 19, 2007

Mr. Scott Drew – Facility Manager
Covanta Fairfax, Inc.
9898 Furnace Road
Lorton, VA 22079

Subject: NEPT Independent Assessment (IA)
Covanta Fairfax, Inc. – Lorton, VA
Avogadro Environmental Corporation Project C07-0035

Dear Mr. Drew:

Please find enclosed, the report of an Independent Assessment conducted on the Environmental Management System (EMS) in place at the Covanta Fairfax. facility. The format of the report incorporates the instructions, procedures, and form prescribed by USEPA for conducting such assessments.

This IA was conducted based on a review of documents provided for review and our efforts compiling the summary report of the EMS to best understand the completeness of the EMS in meeting NEPT requirements. We conducted a site visit to observe operations and interview personnel on September 18-19,2007. This report should be incorporated into the EMS Manual appendices and maintained on site as part of your EMS documentation.

In summary, the facility is well suited for registration in the NEPT program. No major findings were raised. Two minor findings raised include finalizing commitments for NEPT registration and conducting a formal internal EMS audit. A few suggestions were also raised as documented in the enclosed report.

I have also enclosed an assessor profile and certificate of completion from a RABQSA certified ISO 14001:2004 Lead Auditor course provider as evidence of qualification as required by USEPA. If you have any questions regarding this report, please do not hesitate to call me at (610) 559-8776. Thank you very much for the opportunity to offer our services.

Very truly yours,

AVOGADRO ENVIRONMENTAL CORPORATION

William H. Barnes, PE (PA# 062141)
Manager of Consulting Engineering

Cc: (via e-mail)
Joe Herrmann – Environmental Specialist
Karen Stepsus – Regional Environmental Manager

Enclosure(s)

1350 Sullivan Trail, Suite A • Easton, PA 18040 • 610-559-8776 • FAX: 610-559-8913 • www.avogadro.net

William H. Barnes, PE, CPEA - Manager of Consulting Engineering
ISO 14001, NEPT, EMS Auditor and Systems Developer - Assessor Profile
Avogadro Environmental Corporation
1350 Sullivan Trail, Suite A, Easton, PA 18040
Phone: (610) 559-8776
Fax: (610) 559-8913
Cell: (484) 767-3722
E-mail: bbarnes@avogadro.net

Qualifications

- Bachelor of Engineering – Mechanical Engineering, Stony Brook University. 1986.
- Master of Science – Environmental Systems Management, Stony Brook University. 1991.
- Professional Engineer: VA, GA, AL, PA, NJ, OH
- RABQSA Certified Lead Auditor Course – 2005.
- BEAC Responsible Care RC14001/RCMS Lead Auditor Training – 2006.
- IRCA Lead and Principal EMS Auditor No. 01190571
- BEAC RCMS/RC 14001 Certified Professional Environmental Auditor (2/2007)

Background

Mr. Barnes has an extensive background in environmental compliance working directly in leading industries including power, metals, minerals, chemicals, paper, aerospace and foods. He has managed numerous air & water quality permitting projects for major and minor sources. His experience includes working with EPA, OSHA, US Coast Guard and state programs for accidental release prevention and response for oils and hazardous substances. He has over 20 years of experience working with numerous industrial standards (ASME, ANSI, ASTM, API, NFPA, etc.).

Bill has served as a business analyst in the development and implementation of a variety of enterprise and facility-based environmental management programs and supporting information systems. He has participated in the development of Environmental Management Systems in conformance with USEPA NEPT, ISO 14001 and other standards including OSHA Voluntary Protection Program (VPP) efforts.

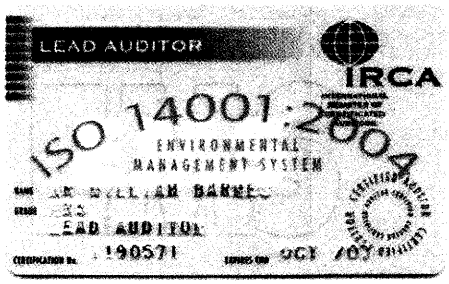
Bill has participated in and managed numerous EHS compliance, pollution prevention and management systems auditing exercises with over 10,000 hours of auditing experience. He has developed auditing programs for leading manufacturing companies in the United States in a variety of industries.

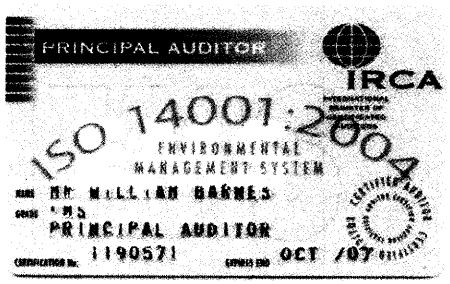
He has conducted outreach workshops on RMP, Waste Minimization, EMS, Clean Air Act Rules, and Environmental Security and has served as an active member of several trade associations including the Air & Waste Management Association (AWMA), Chemistry Council of New Jersey (CCNJ), Electric Power Generating Association (EPGA), Technical Association of the Pulp and Paper Industry (TAPPI), Society of American Military Engineers (SAME), and the American Society of Mechanical Engineers (ASME). Bill is a registered Professional Engineer in Virginia, Georgia, Pennsylvania, Ohio, New Jersey and Alabama.

Assessment Qualifications:

ISO 14001 Environmental Management Systems	Manufacturing Mechanical
Project Management	Land Transportation Equipment
Food and Tobacco Processing	Cement Manufacturing
Textiles and Clothing Production and Processing	Utilities Water Extraction and Distribution
Pulp and Paper Primary Production	Electrical Power Generation
General Chemicals	Electric and Gas Transmission and Distribution
Rubber and Plastics Processing and Products	Disposal Services for Non-Hazardous Waste
Mining and quarrying	Government Offices and Organizations
Metals Primary Production	Disposal Services for Hazardous Waste
Metals Fabricated Products	Printing and Publishing

William H. Barnes, PE, CPEA - Manager of Consulting Engineering
ISO 14001, NEPT, EMS Auditor and Systems Developer - Assessor Profile
Avogadro Environmental Corporation
1350 Sullivan Trail, Suite A, Easton, PA 18040
Phone: (610) 559-8776
Fax: (610) 559-8913
Cell: (484) 767-3722
E-mail: bbarnes@avogadro.net





Certificate of Achievement

awarded to

William Barnes

for successfully completing 36-hours of skills and knowledge training and passing a comprehensive examination and continual evaluation for

ISO14001:2004
Environmental Lead Auditor

for International Environmental Management Systems
Certificate # CHI110705[illegible]

on November 7-11, 2005, instructed by Joseph Phillips, RABQSA Certified EMS Lead Auditor #E052441.

Craig Deane, President
QAI, Indianapolis, Indiana
www.trainingforquality.com

3.6 CEUs

An RABQSA accredited course for the training of Quality Management System Auditors. Accreditation #EMS640.

Quality Training for Compliance and Continual Improvement

RC14001®/RCMS® Training
Certificate of Completion

is hereby granted to:

William Barnes

to certify that you have completed to satisfaction

RC14001/RCMS Lead Auditor Training

September 11-13, 2006 *2.4 CEUs*

VERRICO ASSOCIATES, LLC

Bradley J. Verrico, CPEA
Verrico Associates

BEAC
a BEAC-recognized training organization

RC140906-003

Board of Environmental, Health and Safety Auditor Certifications

Be it known that

William H. Barnes

Having successfully met and given evidence of all prescribed requirements
Established by the Board of Environmental, Health and Safety Auditor Certifications
Is hereby awarded the professional designation of

Certified Professional Environmental Auditor

Responsible Care®

February 8, 2007

Chair

Chair Elect

64

Certificate Number

Accredited by the Council of Engineering and Scientific Specialty Boards

Print Form Submit by Email

National Environmental PerformanceTrack
U.S. Environmental Protection Agency

INDEPENDENT ASSESSMENT PROTOCOL

VERSION 1.0
March 15, 2004

Covanta Energy - Fairfax, VA Facility

Independent Assessment Conducted September 18-19, 2007

By William H. Barnes, CPEA

Avogadro Environmental Corporation

Easton, PA

Project Number C07-0035

GUIDE TO Performance Track INDEPENDENT PROTOCOL

This Independent Assessment Protocol provides guidance to independent parties conducting EMS assessments at facilities wishing to apply to the National Environmental Performance Track program (Performance Track). This Protocol can be used as a stand-alone document, or it can be incorporated into existing audit protocols. The auditor(s) conducting the assessment must meet the qualifications set out in the Performance Track Independent Assessment criterion (see___ www.epa.gov/performancetrack). In addition, the auditor(s) should have a good working knowledge of all of the Performance Track EMS provisions and be familiar with the other Performance Track entry criteria.

The assessment must cover all of the activities, products, and services within the scope of the "facility" wishing to seek entry into Performance Track. Note that, for purposes of Performance Track, a facility may actually comprise buildings, properties, activities, and services that are not co-located on a contiguous parcel of land. The auditor(s) should ascertain the boundaries of the facility - both physical and functional - prior to conducting the assessment. Any questions regarding the acceptability of a particular facility in this sense should be directed to the Performance Track hotline at ptrack@indecon.com or 888-339-PTRK (7875).

This Protocol is organized into the following major evaluation areas:

Section I: EMS Evaluation
- Overall EMS
- Policy
- Planning
- Implementation and Operation
- Checking and Corrective Action
- Management Review

Section II: Top Facility Management Commitment

Section III: Public Outreach

[Public outreach is one of the four Performance Track entry criteria and is included in this assessment protocol because this function is usually integrated into an organization's EMS.]

Following the evaluation sections is a Summary Form that can be used to summarize the auditor(s) findings. Each evaluation topic area contains one or more assessment criteria that must be assessed. Criteria can be assessed as either:

Yes	Conformance. The facility has fully addressed the criterion.
No - Minor	Minor non-conformance. The facility has addressed or marginally addressed the criterion, but still has some discrepancies that could be corrected with minimal organizational, operational, or technical change and within a reasonable time frame.
No - Major	Major non-conformance. The facility has not addressed or adequately addressed the criterion.

Facilities with minor non-conformances may be accepted into Performance Track if: a) EPA determines that the non-conformances taken as a whole do not compromise the effectiveness of the facility's overall

EMS, and b) there is an acceptable corrective action schedule in place to address the deficiencies. Facilities with major non-conformances generally will not be eligible for entry into Performance Track until those deficiencies are corrected. Contact the Performance Track hotline for any questions on this topic.

OVERALL EMS

1. SCOPE

	YES	NO - MINOR	NO - MAJOR
✓ **Does the EMS cover the entire physical area of the facility and all** activities including any ancillary operations such as warehouses, power generation facilities, waste management facilities, offices, R&D facilities, other company divisions or product lines onsite, and contractors operating onsite?	☒	☐	☐

Comments:

The EMS covers the entire footprint of operations at the Resource Recovery Facility. The scale house is operated by Fairfax County who also provides initial screening of waste delivered to the RRF. Ash hauling and disposal, ferrous/oversized metals processing and transfer operations are outside the scope of Covanta's contract and are managed by Fairfax County.

2. CHANGE MANAGEMENT

	YES	NO - MINOR	NO - MAJOR
✓ **Does the facility consider the impacts of changes (e.g., management, budget, staffing, regulatory, product design, and equipment) on the effectiveness of its EMS and revise it as necessary?**	☒	☐	☐

Comments:

All physical and operational changes are evaluated by the management team to assess any impacts on the environment. With maturity in NEPT, specific attention to EMS objectives and targets should be monitored and assessed for impacts from physical changes. The Change Management Procedure EMS-006 details the processes used to assess potential impacts of changes. Quarterly internal environmental reviews include identifying and reviewing any pending capital projects or other significant changes that might impact environmental compliance or performance. Physical changes planned must go through the Facility Change Notice process in TS 201.

3. FULL IMPLEMENTATION CYCLE

	YES	NO - MINOR	NO - MAJOR
✓ **Has the facility's EMS been in place for one complete Plan-Do-Check-Act cycle (including an internal EMS audit, top management review, and any necessary corrective actions)?**	☒	☐	☐

Comments:

The elements that comprise the EMS have been in place for a number of years and have been assessed for continual improvement through compliance audits, management reviews, and client performance reviews. The facility was accepted into the Virginia Environmental Excellence Program with an Exemplary Environmental Excellence (E3) certificate in December 2006.

An internal EMS audit has not been conducted. However, compliance and operational audits conducted periodically do address many components of the EMS. A management review was conducted in early September 2007. Based on a review of the management review report, implementation of the full EMS cycle can be demonstrated and appears to be effective.

POLICY

4. ENVIRONMENTAL POLICY

✓ **Does the environmental policy contain a commitment to compliance with legal and other requirements?**	YES ☒	NO - MINOR ☐	NO - MAJOR ☐
✓ **Does the environmental policy contain a commitment to pollution prevention?**	YES ☒	NO - MINOR ☐	NO - MAJOR ☐
✓ **Does the environmental policy contain a commitment to continuous improvement?**	YES ☒	NO - MINOR ☐	NO - MAJOR ☐
✓ **Does the environmental policy contain a commitment to sharing environmental performance information with the community?** *NOTE: if not in policy, facility may have a separate public outreach procedure or functional program in-place.*	YES ☒	NO - MINOR ☐	NO - MAJOR ☐
✓ **Is the environmental policy communicated internally and externally? [Auditor should interview appropriate/representative employees to determine whether the policy has been adequately communicated.]**	YES ☒	NO - MINOR ☐	NO - MAJOR ☐

Comments:

The Fairfax County facility has adopted the Covanta Energy Corporate Environmental Policy which has recently been revisited to assure conformance with NEPT Requirements. Sharing of environmental performance information is addressed as defined in the EMS-005, Communications. This policy is communicated to employees through their environmental awareness training. As a VEEP E3 facility, and now an NEPT EMS facility, awareness training on the policy, the EMS, and roles & responsibilities have begun with management. Training for all employees is still to be conducted but planning is underway.

PLANNING

5. LEGAL AND OTHER REQUIREMENTS

✓ Does the facility effectively identify and access its legal and other requirements?	YES	NO - MINOR	NO - MAJOR
	☒	☐	☐

Comments:

Legal and Other requirements for air, water, solid waste, hazardous, spill prevention, storage tanks, drums, pesticides/herbicides, noise, emergency planning, PCB, and asbestos are defined and documented in EMS-002a. The procedure for identifying requirements from federal and state regulatory programs to local requirements including sources of information is detailed in EMS-002. The facility environmental specialist maintains a permit binder up to date.

6. ENVIRONMENTAL ASPECTS

	YES	NO - MINOR	NO - MAJOR
✓ **Are regular environmental aspects analyses conducted?**	☒	☐	☐
✓ **Is the facility's entire environmental footprint considered, including any ancillary operations (e.g., warehouses, power generation facilities, offices, R&D facilities), sister divisions onsite, and contractors operating onsite?**	☒	☐	☐
✓ **Does the facility have a system for ranking aspects to determine their significance?**	☒	☐	☐
✓ **Are regulatory requirements, community concerns, and the aspects' potential harm to the environment considered when identifying and ranking aspects?**	☒	☐	☐
✓ **Are the aspects kept up to date as changes occur at the facility and in the community and as legal requirements change?**	☒	☐	☐

Comments:

An aspect identification and ranking exercise was conducted in 2006 and recently reviewed and revised in early September 2007 employing procedure EMS-003. The procedure calls for a minimum of an annual review. Table 2-1 reviewed appears to cover the entire footprint of operations at the facility. A significance threshold for aspects was established and significant aspects identified. Knowledgeable individuals at the facility participated in the exercise.

7. OBJECTIVES AND TARGETS

	YES	NO - MINOR	NO - MAJOR
✓ **Are meaningful and measurable objectives and targets set?**	☐	☒	☐
✓ **Are significant aspects addressed in the objectives and targets?**	☐	☒	☐

Comments:

Objectives and Targets are not completely established for future commitments as prescribed in the procedure EMS-004. Covanta Fairfax is still evaluating the merits and implementation issues for four future commitments. As part of the E3 registration in Virginia, the facility did establish two commitments that are underway and not considered past commitments.

Minor Finding: Covanta Fairfax should establish the four commitments required by NEPT and define objectives and targets related to those four commitments. Significant aspects defined for the facility should be considered first when establishing commitments so that there is evidence that significant aspects are addressed through environmental programs (commitments) with measurable objectives and targets.

8. ENVIRONMENTAL MANAGEMENT PROGRAMS

	YES	NO - MINOR	NO - MAJOR
✓ **Are the facility's environmental management programs actively and effectively meeting their objectives and targets?**	☒	☐	☐
✓ **Are objectives and targets supported by the means to achieve them?**	☒	☐	☐

Comments:

Environmental programs established for VEEP E3 are underway including change out of parts cleaning materials and re-lamping. As detailed in the Management Review Record of September 10, 2007, the parts washers were put in place and appear to be effective in eliminating waste solvent as part of that program. Based on an interview with maintenance personnel, the new parts washer is working effectively.

Suggestion: With the establishment of commitments for NEPT, the facility should plan to monitor progress on commitments/programs and record results in the management review record and be prepared to report year end performance to EPA NEPT (due in April each year).

IMPLEMENTATION AND OPERATION

9. STRUCTURE AND RESPONSIBILITY

	YES	NO - MINOR	NO - MAJOR
✓ **Have responsibilities and authorities for managing and improving environmental performance been well defined?**	☒	☐	☐
✓ **Have responsibilities and authorities for ensuring compliance with legal and other requirements been well defined?**	☒	☐	☐
✓ **Have responsibilities and authorities for public outreach and communication of environmental performance been well defined?**	☒	☐	☐

Comments:

EMS-001 defines the environmental responsibilities for all employees at the facility for managing environmental performance and ensuring compliance. EMS-002 specifically defines responsibilities for identifying legal and other requirements. Responsibilities and procedures for public outreach and communication are defined in EMS-005. Based on interviews with personnel, there is clear understanding of individual roles and responsibilities and a strong sense of commitment and support.

10. TRAINING, AWARENESS, AND COMPETENCE

	YES	NO - MINOR	NO - MAJOR
✓ **Has the organization identified training needs and have all appropriate personnel received the necessary training?**	☒	☐	☐
✓ **Are the facility's employees aware of their roles and responsibilities within the EMS and capable of carrying them out?**	☒	☐	☐
✓ **Are those responsible competent to conduct their assigned roles and are they given the necessary time and resources?**	☒	☐	☐

Comments: Procedure EMS-011 details the various environmental training programs established for facility personnel. EMS-011a provides a table defining regulatory required training elements and how they are addressed by current training programs. The Employee Environmental Awareness Training Manual details 7 modules of training provided by Covanta Energy. Based on an interview with the Chief Engineer, ECOM and Environmental Awareness (7 modules) have been rolled together at Fairfax and are considered effective. Based on discussion with Environmental Specialist, specific awareness training on NEPT and the structure of the EMS itself has not been conducted for all employees to date. The Chief Engineer and Shift Supervisors are all QRO certified and CRO(s) are provisional certified to ASME QRO Operator qualifications to demonstrate competency to operational control aspects.

11. COMMUNICATION

	YES	NO - MINOR	NO - MAJOR
✓ **Does the facility effectively communicate its environmental and EMS information internally and externally?**	☒	☐	☐

Comments:

EMS-005 defines internal and external communication procedures and responsibilities. Internal communications include documented routine communications such as e-mails. Weekly reports prepared by the Environmental Specialist communicates environmental issues to facility, regional and corporate management team members. The Business Manager and/or Facility Manager maintains communications regularly with Fairfax County and citizens in a number of ways described in detail in the Public Outreach section of this report. These elements combine to provide an effective communications program internally and externally. As a member of VEEP E3 and future NEPT membership, Covanta will prepare and submit annual EMS performance reports.

12. EMS DOCUMENTATION

✓ **Is the environmental policy adequately documented?**	YES ☒	NO - MINOR ☐	NO - MAJOR ☐
✓ **Are the significant environmental aspects adequately documented?**	YES ☒	NO - MINOR ☐	NO - MAJOR ☐
✓ **Are objectives and targets adequately documented?**	YES ☐	NO - MINOR ☒	NO - MAJOR ☐
✓ **Are roles, responsibilities, and authorities adequately documented?**	YES ☒	NO - MINOR ☐	NO - MAJOR ☐
✓ **Is the compliance audit program adequately documented?**	YES ☒	NO - MINOR ☐	NO - MAJOR ☐
✓ **Are the emergency preparedness and response procedures adequately documented?**	YES ☒	NO - MINOR ☐	NO - MAJOR ☐
✓ **Is the EMS audit program adequately documented?**	YES ☐	NO - MINOR ☒	NO - MAJOR ☐

Comments:

The EMS Manual comprehensively addresses documentation requirements of the NEPT standard.

Minor Finding: At the time of this visit, the objectives and targets for the EMS to meet NEPT requirements have not been finalized and documented.

Minor Finding: As an internal audit of the EMS itself has not been completed at the time of this visit, it has not been documented and reviewed as part of the management review process.

13. DOCUMENT CONTROL AND RECORDS

	YES	NO - MINOR	NO - MAJOR
✓ **Does the facility have adequate document control and records retention systems to define and control its EMS?**	☒	☐	☐

Comments:

The EMS Manual along with other relevant environmental plans and manuals contain revision control as documents reviewed are all dated and an inventory of relevant documents is maintained including permits, plans, procedures, and manuals. EMS-009 describes document control procedures which are being followed. EMS-009a provides a EMS Document Master Index. It appears to be a comprehensive listing of relevant documents. EMS-010 describes a procedure for managing EMS records. EMS-010a provides a Environmental Records Management Matrix.

Suggestion: The Document Master Index should be amended to incorporate the 14 EMS procedures within the EMS Manual to ensure a comprehensive listing.

14. OPERATIONAL CONTROL

	YES	NO - MINOR	NO - MAJOR
✓ **Does the facility have adequate operational procedures to ensure that equipment and other operations comply with legal requirements and address the facility's significant environmental aspects?**	☒	☐	☐
✓ **Does the facility define and communicate its procedures to ensure that activities are carried out under specified conditions that address significant environmental aspects and legal compliance?**	☒	☐	☐

Comments:

The ECOM details operational controls and all operators are trained on procedures within. Based on a review of the manual, it has been reviewed annually by the Facility Manager and revisions have been tracked. ASME training and certification records for operators demonstrates competency on procedures in the ECOM. All Shift Supervisors have received ASME QRO certification and Virginia DPOR Class 4 licensing. CROs maintain at least provisional certification. Based on interviews of a CRO, Facility Manager, and Chief Engineer, there is strong knowledge of and conformance to ECOM procedure requirements.

15. EMERGENCY PREPAREDNESS AND RESPONSE

	YES	NO - MINOR	NO - MAJOR
✓ **Does the facility have emergency procedures that identify and prevent the potential for accidents and that mitigate the impacts of accidents?**	☒	☐	☐
✓ **Does the facility review and revise, as necessary, its emergency preparedness and response procedures and periodically test such procedures where practicable?**	☒	☐	☐

Comments:

The facility maintains current Emergency Preparedness and Response planning tools including :SPCC Plan, SWPP Plan, and an Emergency Response Plan as required by USEPA, VADEQ and US OSHA accordingly. These plans include requirements for regular inspections of containment areas, storage vessels and response equipment. A review of inspection records for the past several years indicates that these plans are actively managed. Procedures for notification and response activities are included in the SPCC Plan. TS-204 includes specific cleanup and reporting instructions for all hazardous chemicals used on site. According to the Safety Coordinator, MSDS are first consulted for guidance on hazard and response requirements at Covanta Fairfax. Based on an interview with the Safety Coordinator, drills on emergency procedures are conducted at least quarterly. These drills include tests of spill response procedures among other emergencies. Drills are critiqued and documented and posted throughout the facility raise awareness of strengths and weaknesses.

CHECKING AND CORRECTIVE ACTION

16. MONITORING AND MEASUREMENT

	YES	NO - MINOR	NO - MAJOR
✓ **Does the facility regularly monitor and measure its key operations that can have a significant impact on the environment and record this information?**	☒	☐	☐
✓ **Does the facility have effective procedures in place for monitoring and measuring, on a regular basis, its key environmental performance indicators (e.g., solid waste generation, water and energy usage, water and air emissions, material use)?**	☒	☐	☐

Comments:

Daily reports of key production and environmental indicators are reviewed at daily meetings. A number of other periodic monitoring, inspection and auditing reports are compiled and reviewed by facility management and corporate environmental representatives. Weekly environmental inspections are done by shift supervisors and reviewed by the chief engineer. Based on a discussion with the Facility Manager, conditions are being adequately addressed in a timely manner. Based on a review of 2007 monthly SPCC tank inspection records and SWPPP quarterly BMP inspections, there are no deficiencies in managing SPCC or Storm Water Pollution Prevention requirements. There is strong evidence that these reports are actively used to manage environmental performance.

17. EMS AND COMPLIANCE AUDITS

	YES	NO - MINOR	NO - MAJOR
✓ **Does the facility adequately audit its conformance with its EMS (e.g., are facility personnel trained and/or competent in EMS auditing; are internal audits conducted on at least an annual basis; are all activities, products, and services covered in an audit cycle)?**	☐	☐	☒
✓ **Does the facility adequately audit its compliance with relevant legal requirements (e.g., are facility personnel competent in compliance auditing; are internal audits conducted on at least an annual basis; are all regulated activities, products, and services covered in an audit cycle)?**	☒	☐	☐

Comments:

EMS-012 details the elements of auditing. Formal internal EMS auditing has been established as part of the corporate compliance audit program. This exercise serves as an external audit of the EMS. The procedure calls for annual EMS audits. An internal EMS audit has not been conducted at the time of this audit. On a weekly basis, the facility conducts an SPCC facility-wide inspection and reports environmental issues to be raised and or addressed to plant management. A review of the inspection reports for the past six months did not indicate any issues. Internal quarterly reviews are conducted in accordance with corporate procedure TS 204. A quarterly review with Regional Environmental Manager tracks status of any open corporate audit items. Corporate compliance audits are conducted on a 4-year cycle. A corporate audit was conducted in May 2007. A quarterly from the corporate audit has been reviewed and open action items are monitored. Daily CEM reports are reviewed and recorded.

18. CORRECTIVE AND PREVENTATIVE ACTION

✓ Does the facility have adequate procedures for investigating, correcting, and preventing nonconformance?	YES	NO - MINOR	NO - MAJOR
	☒	☐	☐

Comments:

Corrective and Preventive actions are addressed in several ways depending on the severity of the incident or potential incident. Corrective and Preventive Actions that follow documented and known CAPA procedures (e.g. ECOM) that are used are documented in shift logs and discussed at daily meetings and corrective actions documented via work orders in MAXIMO. In addition, a number of inspection processes in place ensure that such day-to-day fixes are implemented. Incidents that are not anticipated or considered to have a low likelihood of occurrence should employ some form of investigation and root-cause analysis to maintain an effective CAPA program. EMS-013 outlines the CAPA procedure. Examples of incidents that warrant using the CAPA are defined in the procedure.

MANAGEMENT REVIEW

19. MANAGEMENT REVIEW

✓ Does the facility's top management review, at defined intervals, the effectiveness of its EMSs and are the findings of the review documented and addressed?	YES	NO - MINOR	NO - MAJOR
	☒	☐	☐

Comments:

A management review was conducted in September 2007 covering all elements of the EMS. Environmental performance and compliance is reviewed daily, weekly, monthly, quarterly and annually via a number of exercises described elsewhere in this report. EMS-014 provides a procedure and form for conducting formal management review of the EMS in accordance with NEPT and VEEP E3 standards. With maturity in the NEPT program preparation of an annual report for submittal to EPA will be included in this review and should be documented.

INTERVIEW WITH TOP MANAGEMENT

1. MANAGEMENT INVOLVEMENT IN ENVIRONMENTAL POLICY

Describe your involvement in the development and communication of your facility's environmental policy. How do you use the policy to guide decision-making at your facility?

Comments:

The policy has been developed on a company-wide basis and adopted at the facility. It provides the core principles to guide all business decisions on procedures, equipment, systems and permit modifications.

2. MANAGEMENT ROLE IN EMS

Discuss your role in managing environmental issues and discuss how you use the facility's EMS to improve environmental performance.

Comments:

The Facility Manager expressed that the EMS allows a central point of focus to access information relevant to many business decisions including: responsible personnel, requirements, and location of specific documents and records. It also ensures periodic review of this information so that it is current and effective.

3. Management Attention to EMS Effectiveness

How do you as a senior facility manager determine the effectiveness of your facility's EMS?

Comments:

The effective is determined by the facility's reaction to abnormal conditions and performance on a daily basis. Strong response to both scenarios indicates that the EMS is effective in supporting decisions and actions.

4. Management Expectations for Performance Track Participation

What do you see as the primary benefits of participating in Performance Track? What can EPA and/or the State do to improve the value of your participation in the program?

Comments:

According to the Facility Manager, primary benefits include potential for more flexibility and leeway in permitting. This has been realized through recent solid waste permitting with VADEQ and the fact that the facility is a VEEP E3 site led to more flexibility on the part of agency permit writers.

Another benefit in-house has been the raising of the bar to make the facility stand out above others in the industry and realizing efficiency gains through environmental programs beyond compliance.

PUBLIC OUTREACH & PERFORMANCE REPORTING

1. Describe how your facility identifies and responds to community concerns.

✓ Is the facility taking appropriate steps to identify and respond to community concerns?	YES	NO - MINOR	NO - MAJOR
	☒	☐	☐

Comments:

The Business Manager and the Facility Manager and at times the Environmental Specialist are responsible for responding to community concerns. They participate in monthly meetings of the Lorton Citizens Alliance Team (LCAT) and the Fairfax County Division of Solid Waste. There has been no recent history of concerns at the facility.

Covanta Fairfax participates in the Annual Fairfax County Fair. The facility also provides tours of operations to the public. Covanta Fairfax partners with Eagleview Elementary School.

The effectiveness of the outreach at this facility is reflected in the lack of petitions against the facility on public notice changes, and a history of no complaints over the past decade.

2. Describe your facility's process for informing the community of important matters that affect them.

✓ Does the facility adequately inform the community of important environmental matters?	YES	NO - MINOR	NO - MAJOR
	☒	☐	☐

Comments:

Emission episodes are required to be reported to VADEQ as required by conditions of the Title V permit. SARA reporting of hazardous chemicals on site is conducted annually. Monthly meetings with Fairfax County Solid Waste Division provide another channel to communicate environmental matters.

3. Describe your facility's process for reporting its environmental performance to the public, including the Performance Track Annual Performance Report.

	Yes	No - Minor	No - Major
✓ **Is the facility's approach to reporting performance information to the community appropriate to its scale of operations and setting?**	☒	☐	☐
✓ **Does the facility make its Performance Track Annual Performance Report (APR) available to the community?**	☒	☐	☐

Comments:

Annual emissions statements, quarterly Excess Emission and CEMS Downtime Reports, Semi-Annual reports, Title V Annual Certification for air quality; SARA Tier II for hazardous substances; Annual Solid Waste Assessment; Semi-Annual wastewater analysis by Fairfax County; and Quarterly sanitary wastewater reporting to the state are examples of the many reporting mechanisms that provide transparency of environmental performance for the facility.

As the facility has not yet submitted application or received registration to NEPT, this process cannot be fully evaluated at this time as an annual report has not been submitted. EMS-005 details the procedure for submittal of the NEPT report in accordance with EPA requirements.

End of Document