

Landfill Monitoring Requirements

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Agenda

- Solid Waste Regulation History
- Landfill Assessment and Permits
- Landfill Owner Responsibilities
- Landfill Monitoring Plans
- Reporting to MassDEP
- Adequately Regulated
- 2- and 72-hour Reporting Conditions

Solid Waste History

- Almost every municipality in MA has a closed landfill – BoH might be primary contact
- Federal Solid Waste regulations promulgated April 21, 1971.
- Landfills closed prior to 1971 may not be under SW authority
- Solid Waste Regulations 310 CMR 16.00 (Site Assignment) and 310 CMR 19.000 (Solid Waste operations)



MassDEP

Commonwealth of Massachusetts
Department of Environmental Protection

Landfill Assessment

SW-12 Initial Site Assessment (ISA)

SW-23 Comprehensive Site Assessment (CSA) and Risk Assessment

SW-24 Corrective Action Alternative Analysis (CAAA)

SW-25 Corrective Action Design (CAD)

SW-22 Permit – Modifications

Landfill Owner Responsibilities

- **Monitoring of environmental media at frequency determined in approval and for parameters in 310 CMR 19.132**
- **Maintenance of monitoring network**
- **Third-Party Inspections at frequency determined in approvals or by regulations 310 CMR 19.018**

Modification to Monitoring Plans

- Most Landfills monitor on a semi-annual basis
- SW-22 Permit may be submitted to modify the frequency or monitoring points.
 - Suitable evidence and technical justification is required.



Why is this important?

- **Detection Monitoring – 30 year minimum**
- **BoH might be primary contact**
- **Protection of human health and environment**
- **New receptors – private wells, developments**

Elements of a Report Submittal

- **Stand alone reports (19.132)**
 - Narrative
 - Supporting evidence
 - Trend analysis
 - Tabulation of data and attachment of lab analytical
 - Issues encountered/solutions
- **Important deadlines**
 - 60 days from sampling – report due
 - 14 days from sampling – reporting exceedances
 - 2- and 72-hour notification to BWSC
- Reports uploaded to DEP's compliance reports upload portal

Adequately Regulated Status

- **310 CMR 40.0110**-The adequately regulated provisions are designed to reduce regulatory overlap and duplication.
- Response Actions at Solid Waste facilities - 2- and 72-hour reporting conditions under Massachusetts Contingency Plan (MCP)
- MCP better equipped for responses to Imminent Hazards
- <https://www.mass.gov/doc/adequately-regulated-fact-sheet/download>
- Fact Sheet #5 provides info on response actions at Solid Waste facilities.

Examples of 2-and 72-hr Conditions

- Landfill gas detected greater than 10% the lower explosive limit (LEL) in a building or utility conduit (2 hr)
- Detection of regulated contaminants detected greater than their Maximum Contaminant Level (MCL) or respective standards in a landfill monitoring well within 500 feet of a private drinking water well (72 hr) example 1,4 dioxane
- Monitoring of a private well as part of the landfill monitoring network and there is a detection of ANY level of a regulated pollutant in a private well (2 hr)

Conclusions

- As the Board of Health Agent, you might be required to report to MassDEP
- Knowing when to report and which Bureau to report to is important
- Knowing the monitoring requirements for a Landfill in your town keeps everyone healthier and safer
- More communication is better, please reach out to your regional section chiefs with questions!

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