

PCA: What's working, what needs attention on CDI Landfills

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Comment on 2003 Landfill Study

- Classification of demo landfills into types 1, 2, and 3
- Improved GW data quality and monitoring results
- More demo landfills with GW monitoring wells
- Consistency thru MPCA technical forums
- Better operational requirements (e.g., waste screening)
- Developing pre-demolition inspection rules

Discussion Topics

1. Demolition Landfill Guidance Document
2. Permit-by-Rule (PBR) Demolition Landfills
3. Industrial Landfills
4. MPCA Rulemaking Plans through 2010
5. Diverting Material from CDI Landfills
6. Understanding Risks

1. Demolition Landfill Guidance Document (August 2005)

- Risk management approach created with stakeholders
- Applied at permit issuance/reissuance
- Almost 2/3 of demolition landfills have groundwater monitoring systems
- The remainder will be evaluated by 2011
- Guidance working well

2. Permit-by-Rule (PBR) Demolition Landfills

- 20-40 PBRs created annually
- Offers flexibility; but 15,000 cu yd, one-year maximum outdated
- Options for changing PBR rule:
 - ▣ Smaller size? Project specific?
 - ▣ Government agencies only?
 - ▣ Additional requirements? (e.g., GW monitoring, waste screening)
- Needs thorough cost/benefit discussion

3. Industrial Landfills

- There are 18 permitted monofills and 3 merchant landfills
- Using mix of current rules, written guidance and unwritten standard practices
- Sufficient authority to issue permits that protect human health and the environment
- Prescriptive rules difficult because of diverse nature of waste
- Recommendation: develop comprehensive guidance document

4. MPCA Rulemaking Plans through 2010

- Many current rulemaking obligations
- 2008 Legislative rulemaking directive:
 - ▣ Groundwater protection through landfill siting
 - ▣ Financial assurance
- Legislative rulemaking report due Jan. 15, 2010

5. Diverting Material from CDI Landfills

- Beneficially use and recycle specific waste streams
- Progress in some areas (pavement, metal); not others (biomass, shingles)
- Drywall: need info about environmental effects of recycling or beneficial reuse
- Pre-demolition rules in progress (Remove hazardous components from structures before landfilling)

6. Understanding Risks

- Monitor health risks at non-MSW landfills
 - ▣ Air impacts (e.g., H₂S emissions)
 - ▣ Groundwater impacts (inorganics and organics such as PFCs)
- Check environmental impacts from closed PBR Demo landfills
 - ▣ Funding would be needed for such an effort

Questions Re: Discussion Topics

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Water and Land Rulemakings

- Non-degradation
- Tiered Aquatic Life Stds
- Triennial Stds Update
- Feedlots
- Pollutant Trading
- Fees
- Operator Training
- ISTS
- CWP Grants
- Ballast Water
- Pre-demolition
- UST Training
- HW Federal Updates
- SW County Planning
- Air Multi-rule
- Incinerators