

STATE OF ALASKA
DEPT. OF ENVIRONMENTAL CONSERVATION
DIVISION OF ENVIRONMENTAL HEALTH

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September 11, 2008

CERTIFIED MAIL # 7000 0520 0025 2110 0434
RETURN RECEIPT REQUESTED

Skip Ryman, Borough Manager
City of Yakutat
P.O. Box 160
Yakutat, Alaska 99689

RE: Inspection of the Yakutat Landfill, August 4, 2008, Facility Not Permitted

Dear Mr. Ryman:

On August 4, 2008 I inspected your Class III municipal landfill in the company of Property Manager, Steve Madej. I wish to thank him for taking the time to show me this site. Your compliance rating for this inspection is 44% with your landfill earning a score of 123 out of a total possible score of 280. I have enclosed a copy of the completed inspection checklist with this letter.

During my last inspection in 2007, I observed major operating improvements that had been made to your solid waste disposal facility. You had initiated a new hazardous waste collection effort and most importantly, stopped burning and moved to a trench and fill system for your disposal of municipal solid waste. This year Steve successfully made arrangements to remove your community's large collection of abandoned vehicles along with the large pile of white goods and scrap metals that had collected in the middle of the landfill. The Solid Waste Program applauds the City of Yakutat in its continuing efforts to improve the management and operations of its disposal facility.

However, it appears you have experienced a setback in household waste disposal operations from 2007. This landfill has significant safety related problems related to bear attraction to waste. Your current operational methods to reduce odors and infiltration of water through the waste are inadequate. ADEC recommends using the trench and fill technique at most small landfills because this method generates cover material and allows waste to be covered more frequently. Waste should be landfilled in an upward fashion and not disposed into a depression where water can gather to form leachate. An upward progression to waste disposal allows for greater compaction by equipment and better application of soil cover material. Since bears are an issue, compacted cover material should be provided daily and a fence and other means should be provided around the active working area to prevent access by animals. Please see Alaska's DEC Solid Waste Procedures Manual for suggested best management practices.

My issues of concern noted and discussed during the inspection include the following:

1. The City continues to operate a landfill without an ADEC solid waste disposal permit.
2. The working face was too large and cover material is not used effectively.
3. Drums and other containers are unlabeled and exposed to the outside elements.

These issues are discussed in more detail in the following paragraphs.

18 AAC 60.200 Permit requirement

A person may treat or dispose of solid waste, or construct, modify, or operate a solid waste facility only in accordance with a solid waste disposal permit issued by the Department under 18 AAC 60.200. An ADEC solid waste permit provides the necessary means for owners/operators to operate and manage facilities in compliance with Solid Waste Management Regulations, 18 AAC 60. Operating in compliance with an ADEC solid waste permit minimizes the risk to public health, safety, and the environment. It also limits the amount of liability to the permittee and helps protect the property values within and around the area of the landfill. Your lack of ADEC permit consistently reduces your inspection score by at least 40 points.

18 AAC 60.345. Cover material, working face, and litter control requirements for a Class III MSWLF.

I saw at least two separate brown bear sows each of which had three cubs foraging through garbage during my two hour inspection. Alaska waste disposal regulation 18 AAC 60.230(b) requires the owner/operator of a Class III municipal landfill minimize, to the extent practical, control access by wildlife and domestic animals to putrescible waste deposited at the facility. Rather than utilizing the trench and fill method of disposal as you had originally indicated you were using, the operator moved the waste from the public dumpsite over to the tree line near the edge of the landfill. The waste was not covered with enough soil to discourage animal scavenging activity. The placement of waste in this location could also be a possible violation of the 50 foot setback requirement found in 18 AAC 60.233. Wherever possible, ADEC recommends using the trench and fill technique at smaller landfills because the method generates cover material and allows waste to be covered more frequently. The working face should be made as small as possible. Cover material should be placed as necessary to control access by birds, bears and other animals.



Public Dumpsite (Standing Water and Excessive Litter)



Waste is moved to tree line where animals scavenge

In addition, a pond of water was located within 10 feet of the gate entrance area where bears were wading. This pond needs to be filled in immediately.



Bears Wading In Pond Within 10 Feet of Gate Entrance

18 AAC 60.010 Accumulation, storage, and treatment

A person may not store accumulated solid waste in a manner that causes a health and safety hazard. The unmarked 55-gallon steel drums that contain hazardous materials are potential health hazards. Drums that contain used oil or other hazardous substances must be labeled appropriately and stored in an enclosed structure. Steel containers stored outside are prone to corrosion and leakage. I observed multiple violations related to open dumping of potentially hazardous wastes such as batteries and oils. Drums of oil, batteries and paints were improperly stored and in some cases the contents were spilled directly onto the ground.



Exposed and unlabeled drums



Hazardous wastes exposed to elements

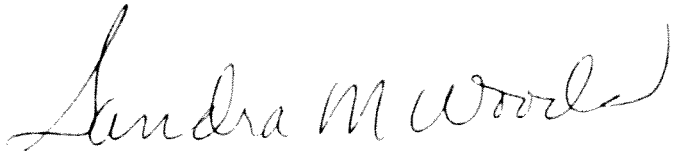
I don't want to impose unnecessary constraints on your time or budget. However; these issues have been going on for far too long and must be resolved. Increased compliance with Alaska solid waste standards will ensure a safe and sanitary facility, limit your long-term liability, and increase the quality of life for residents who use the facility.

Please respond to me in writing within 30 days of receiving this letter with your plan and a proposed schedule for how you wish to resolve the issues discussed in this report as follows:

1. Include a legal description of your site, including a map referencing current and future waste placement areas. A site map of your facility would allow you to determine future placement of solid waste and where you can dig new trenches.
2. Provide us with a detailed description of the type of solid waste management system you intend to use within your landfill and when and where you intend to incorporate it.
3. Describe how you intend to label and where you intend to store the drums of oil, batteries and paints to comply with the above referenced regulations.

With this letter, I have attached your inspection report and photos taken at this inspection. Please feel free to contact me at 907-465-5318 if you have any questions regarding this report. Thank you for allowing me to inspect your facility.

Sincerely,

A handwritten signature in cursive script that reads "Sandra M Woods". The signature is written in black ink and is positioned above the printed name and title.

Sandra M. Woods
Solid Waste Program

Attachments: Completed Inspection checklist



Landfill: Yakut
MSWLF

Weather Conditions:

Date of Inspection: 8/4/2008

ADEC Inspector: Sandra Woods

Participants: Steve Madej
Property
Maintenance
Manager

Overcast and Rainy

Past Month 14.34"
Rainfall:

Scoring

Total points awarded: 123

Total possible points: 280

Final Score (percent): 44%

ADEC Signature: *Sandra M Woods*

Printed Name: Sandra M. Woods

Title: Environmental Program
Specialist

Part One: ADEC Information Gathering

This section should be filled out completely, prior to the site visit. This section is not scored, but the information will be used during the site visit to determine compliance with requirements.

#	Part One: ADEC Information Gathering
1	<p>PERMIT AND OPERATING PLAN – Review permit and operating plan to familiarize yourself with the requirements and approved operations for this landfill.</p> <p>Does the facility have a current ADEC permit? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>Permit Number: _____</p> <p>Expiration Date: _____</p>
2	<p>SITE/DEVELOPMENT PLANS – Review site plans and development plans to familiarize yourself with the approved layout of the landfill and the conditions at the site.</p> <p>Check the conditions that exist at the landfill:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Is the landfill located in or near wetlands? <input type="checkbox"/> Is the landfill located on permafrost? <input type="checkbox"/> Is the landfill located in a 100-year floodplain? <input type="checkbox"/> Is the landfill located within 5,000 feet of any airport? <input type="checkbox"/> Is the landfill located within 10,000 feet of an airport used by turbojet aircraft? <input type="checkbox"/> Are there any drinking water wells within 500 feet of the landfill property boundary? <p>Has a current/up-to-date site map been submitted? No</p>
3	<p>PREVIOUS INSPECTIONS – Review previous inspection forms. List any issues that may still be outstanding that should be investigated.</p> <p>City is operating a landfill without an ADEC solid waste disposal permit. Drums and batteries were exposed to the outside elements.</p>
4	<p>COMPLAINTS – If ADEC has received any complaints regarding the facility, list and describe them below:</p> <p>ADEC Solid Waste Program received a complaint from Neil Barton of Alaska’s Fish and Game Department regarding excessive bear activity at the landfill.</p>

Part One: ADEC Information Gathering

5 **AUTHORIZED WASTE TYPES** – *The landfill is required to have a permit that authorizes all types of waste disposed at the site.*

Check the types of waste that the facility is authorized to dispose:

- Municipal Solid Waste
- Inert or C&D Waste (*May be disposed in MSW cell. Requires authorization if disposed in separate cell*)
- Regulated Asbestos Containing Material (RACM) (*Must be disposed in separate cell*)
- Septage or Honey Bucket Waste
- Other (list) _____

6 **SIGN REQUIREMENTS** – *Many permits require signage that identifies the owner or operator, hours of operation, emergency contacts, or other information.*

List any signage requirements specified in the permit:
Facility is not permitted.

7 **LAND OWNERSHIP** – *The landfill application must contain documentation that the operator is the landowner, or that the operator has obtained authorization from the land owner.*

Check the appropriate box.

- The operator is the landowner
- The landowner has authorized the landfill

No permit application documentation in file.

8 **WAIVERS** – *The landfill may obtain waivers for requirements related to development or operation.*

List any ADEC-approved waivers:
No waivers because facility not permitted.

Part One: ADEC Information Gathering

9 **MONITORING REQUIREMENTS** – A facility may be required to monitor groundwater, surface water, gas, or other parameters. Requirements are specified in the permit or approved monitoring plan. By regulation, monitoring reports must be submitted to ADEC for groundwater and surface water. If reports are required for other types of monitoring, it will be specified in the permit. This information will help you determine if the operating record is complete.

Check the types of monitoring that the facility is required to conduct, note the required sampling frequency, and check if reports must be submitted to DEC:

Type	Check if Sampling is Required	Sampling Frequency	Check if Report to DEC Required
Groundwater			
Surface Water			
Gas			
Thermal			
Slope Stability			
Piezometer			
Other			

10 **MONITORING LOCATIONS** – Sampling must be conducted at approved wells or sites. Locations are specified in the monitoring plan.

Make a copy of a site plan or map that shows the locations of monitoring wells, surface water sampling sites, or other approved monitoring locations. Take the map with you to assist in field inspection.

11 **ADDITIONAL PERMIT REQUIREMENTS**

List any additional permit requirements that are not addressed in the inspection checklist.

Facility is not permitted.

Part Two: ADEC Records Review

This section should be completed and scored in the office, prior to conducting the site visit.

#	Part Two: ADEC Records Review	POINTS	
		Possible	Score
1	<p>FEES – <i>The landfill is required to pay annual and other fees to ADEC. 18 AAC 60.700</i></p> <p>Is the facility current on payment of all fees? <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Date of last payment: _____</p> <p>OR</p> <p>Amount owed: _____</p> <p>Facility is not permitted and does not pay any fees to ADEC.</p>	5	NA

Part Three: Landfill Records

This section should be completed at the landfill facility during the site visit.

#	Part Three: Landfill Records	POINTS	
		Possible	Score
1	<p>PERMIT – A copy of the permit application and current permit must be kept in the operating plan. 18 AAC 60.235</p> <p>Is a copy of the permit application and current permit in the operating record? Landfill is not permitted with ADEC.</p>	10	0
2	<p>OPERATIONS PLAN – The operations plan should be used as a guide for day to day operation of the landfill. A copy must be kept in the operating record. 18 AAC 60.210, 18 AAC 60.235, permit</p> <p>Does the operating record contain a copy of the operations plan?</p> <p>Yakutat submitted a draft SWMP dated December 2006 in our file. There is no indication that this operations plan was approved by ADEC. In addition, a copy of any management plan was not available at the landfill for the operator's use.</p>	10	0

#	Part Three: Landfill Rec	POINTS	
		Possible	Score
3	<p>VISUAL MONITORING – Visual monitoring must be performed at least monthly and recorded on a form approved by ADEC. Records must be maintained for at least 5 years. 18 AAC 60.800</p> <p>Does the operating record contain copies of <u>monthly</u> visual monitoring reports?</p> <p>I discussed this issue with the public works director, Steve Madej and explained how this is one method of operation that Yakutat could use to work towards running a better landfill for little or no money.</p> <p>Check each item that is included on the Visual Monitoring Form:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Violations of permit conditions, or regulatory requirements <input type="checkbox"/> Settlement <input type="checkbox"/> Ponding <input type="checkbox"/> Leakage <input type="checkbox"/> Thermal instability (permafrost landfills only) <input type="checkbox"/> Thawing of waste (freezeback landfills only) <input type="checkbox"/> Frost action <input type="checkbox"/> Erosion <input type="checkbox"/> Signs of damage to due to operations <input type="checkbox"/> Damage to monitoring devices <input type="checkbox"/> Escape of leachate <input type="checkbox"/> Escape of waste <input type="checkbox"/> Unauthorized waste disposal <input type="checkbox"/> Windblown litter <input type="checkbox"/> Slippage of a flexible liner or damage to its anchor <input type="checkbox"/> Erosion, tearing, cracking, or other damage to the cover or liner <input type="checkbox"/> Damage to a containment structure, retaining wall, erosion control, or diversion structure <input type="checkbox"/> Fire or combustion in the waste <input type="checkbox"/> Impacts to fish, wildlife, or vegetation <input type="checkbox"/> Any other conditions that threaten public health or the environment: <hr/> <hr/>	10	0

#	Part Three: Landfill Records	POINTS	
		Possible	Score
4	<p>OTHER OPERATING RECORD ITEMS – <i>The facility is required to maintain many other items in the operating record. 18 AAC 60.235, 18 AAC 60.305, 18 AAC 60.310, 18 AAC 60.810, 18 AAC 60.830</i></p> <p>Check each of the required items in the operating record:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Inspection records <input type="checkbox"/> NOI or NPDES permit (if required) <input checked="" type="checkbox"/> As-built drawings <input type="checkbox"/> Monitoring plan (if required) <input type="checkbox"/> Leachate recirculation records (if required) <input type="checkbox"/> Documentation showing how the landfill is designed and operated to prevent bird hazard (If the landfill is within 5,000 feet of any airport, or 10,000 feet of an airport used by turbojet aircraft) <input type="checkbox"/> Documentation showing the landfill will not restrict floods and waste will not be washed out (if located in 100 year floodplain) <p>No records are kept at the facility office however an as-built drawing of the landfill was kept at the City hall building files. There appears to be no map of the landfill that indicates where waste has been deposited and no future plans that would help the facility operators decide where to deposit solid waste. Steve Madej stated that they want to use the Sealaska property next to the current landfill as a future landfill location but as of this inspection, the details have not yet been worked out.</p>	5	0

Part Four: Landfill Development

This section should be completed at the landfill facility during the site visit.

#	Part Four: Landfill Development	POINTS	
		Possible	Score
1	<p>LANDFILL DEVELOPMENT – <i>The facility is required to follow the approved landfill site plans and development plans. If minor changes are made, they should not be detrimental to regular operations. Any major changes must be approved by ADEC Waste may not be placed within 50 feet of property boundary. 18 AAC 60.233, 18 AAC 60.210, permit</i></p> <p>Is the facility following the site and developments plans? They are attempting to make some changes to their landfill operations but the City of Yakutat has a long way to go to be in full compliance with the solid waste regulations. Prior to my inspection this year, all of the abandoned vehicles and a large pile of white goods and metals had been removed and shipped out of the community. This made a big difference in cleaning up that section of the landfill.</p> <p>If any minor changes have been made, are they detrimental to operations? Yes, during my inspection I noticed that the operator was no longer using the trench and fill method of disposal. The municipal waste was being moved from the public dumping area to an area over by the tree line. Appropriate use of cover material was not used and I saw significant scavenger activity including bears, eagles and ravens during my inspection.</p> <p>Is the waste disposal area at least 50 feet from the property boundary? I'm unsure if the tree line is at least 50 feet from the property boundary.</p>	30	15
2	<p>WATER WELLS – <i>Waste may not be disposed of within 500 feet of a drinking water well. If any wells exist within 500 feet of the property boundary, the site must be developed and operated to ensure that waste is not deposited too near the wells. 18 AAC 60.040</i></p> <p>Has development of the landfill or surrounding area impacted this separation zone? There are no drinking water wells within 500 feet of the property boundaries.</p>	10	10

Part Five: Access

This section should be completed at the landfill facility during the site visit.

#	Part Five: Access	POINTS	
		Possible	Score
1	<p>SIGNAGE – A clearly legible sign must be posted at the entrance to the landfill. The sign must prohibit disposal of regulated hazardous waste and polychlorinated biphenyl (PCB) waste. Most permits also require signage that identifies the owner or operator, hours of operation, and emergency contacts. 18 AAC 60.240, permit</p> <p>Are signs prohibiting hazardous waste and PCB waste posted and clearly legible?</p> <p>There are still no signs prohibiting hazardous waste and PCB waste posted.</p> <p>If additional signage is required, is it posted and clearly legible?</p> <p>The facility is not permitted. Facility signage is very basic and only indicates when the landfill is open and closed.</p> <p>Do the existing signs meet all of the requirements noted in Part One, Question 6?</p> <p>The Yakutat landfill is not permitted with the State of Alaska.</p>	5	1
2	<p>ACCESS – Access to the landfill facility must be limited by the use of fencing, berms, or natural barriers to control public access to the site. This should prevent unauthorized traffic or dumping. 18 AAC 60.220</p> <p>Is access to and within the facility limited?</p> <p>The facility is gated but does not appear to be locked during hours landfill is closed. A private waste hauler that works within the community sometimes leaves garbage at the landfill dumpsite before the landfill is actually open. Scavenging bears and eagle then have open access to the garbage left by the private hauler before it can be buried and covered by the operator.</p> <p>Is there any evidence of unauthorized access to the landfill (target shooting, off-road vehicles, etc.)</p> <p>No</p> <p>Is there any evidence of dumping outside the permitted areas?</p> <p>No</p>	20	5

Part Six: Working Cell Operations

This section should be completed at the landfill facility during the site visit.

#	Part Six: Working Cell Operations	POINTS	
		Possible	Score
1	<p>AUTHORIZED WASTE TYPES – <i>The landfill is required to have a permit that authorizes all types of waste disposed at the site. 18 AAC 60.200</i></p> <p>Is there evidence that the facility has accepted or is accepting any wastes that are not addressed or authorized in the permit? (See answers in Part One, Question 5)</p> <p>This facility is not permitted. We have a draft Solid Waste Management Plan dated December 2006 in our file that has not been approved by ADEC.</p>	20	0
2	<p>WORKING FACE - <i>The working face must be kept as small as practical. 18 AAC 60.345</i></p> <p>Estimate the size of the working face.</p> <p>The municipal solid waste working face is too large and not covered in a manner to discourage animal scavenging activities. They are no longer using the trench and fill method of disposal. There is solid waste scattered everywhere near the working face and over by the tree line.</p> <p>Does the working face appear to be larger than necessary?</p> <p>Yes.</p>	10	0
3	<p>COVER - <i>Waste must be covered by 6 inches of soil or an approved alternative cover as necessary to control disease vectors, fire, odor, blowing litter, and scavenging. 18 AAC 60.345</i></p> <p>Is there any evidence that waste is not covered sufficiently?</p> <p>Municipal solid waste is not covered enough to control animal scavenging. I saw at least two different brown bear sows and they had three cubs each with them that have become habituated garbage bears.</p>	20	0

Part Seven: General Operations

This section should be completed at the landfill facility during the site visit.

#	Part Seven: General Operations	POINTS	
		Possible	Score
1	<p>BURNING – <i>Uncontained burning of municipal waste on the ground is not allowed at Class III landfills. Burning may be conducted in a burn box, burn cage, or other device where burning is contained and controlled. All other fires must be extinguished immediately. 18 AAC 60.233, 18 AAC 60.355</i></p> <p>Is burning conducted at the landfill?</p> <p>Yes. Only wood and wood products are burned. I did not see any signs of burning solid waste. Municipal waste is disposed of on-site and then moved over to the tree line for disposal. In 2007, they were going to use the trench and fill method of disposal but during my inspection in 2008, this was not occurring.</p> <p>If so, is it properly contained in a burn box or other device?</p> <p>No</p> <p>Is there any evidence of uncontrolled fires in or near the landfill?</p> <p>No</p>	10	8
2	<p>LITTER - <i>Litter must be controlled so that it does not become a nuisance or hazard. 18 AAC 60.233, 18 AAC 60.345</i></p> <p>Is excessive litter evident at or near the landfill?</p> <p>There's a moderate to severe amount of litter in and around the municipal dumpsite area of the landfill. There was improvement and cleanup over in the vehicle disposal area and the large pile of scrap metal had been cleaned up and taken away by a company that collects scrap metals.</p> <p>Check the types of measures that are used to control litter at the landfill:</p> <p><input type="checkbox"/> Litter fencing</p> <p><input type="checkbox"/> Litter collection</p> <p><input checked="" type="checkbox"/> Other <u>Scrap metal collection efforts were improved.</u></p>	5	3

#	Part Seven: General Operations	POINTS	
		Possible	Score
3	<p>DUST, ODOR, NOISE, ETC. - <i>Dust, odor, noise, traffic, and other effects from the landfill must not become a nuisance or hazard to the public health, safety, or welfare. 18 AAC 60.233</i></p> <p>Are dust, odor, noise, traffic or other effects from the operation causing, or likely to cause, a nuisance to neighboring homes or businesses?</p> <p>In the past there have been complaints from neighboring homes regarding drifting smoke from burning waste. The landfill does not appear to be burning solid waste at this time. The public is at risk at this landfill because a large portion of the community brings their own household waste to the facility and this increases their exposure to the garbage habituated bears. During my inspection, I observed brown bears cubs that showed no fear of humans and in fact they were very curious and started to walk towards me when I stopped and took their picture from my vehicle.</p>	5	0
4	<p>SALVAGING - <i>Public salvaging, if allowed, must be limited to an area that does not hinder facility operation, create a safety hazard, or cause pollution. 18 AAC 60.220</i></p> <p>Is public salvaging restricted to a controlled area away from the working face? Yes</p> <p>Auto bodies are separated out of the waste stream and placed in the Northeastern side of the landfill site for salvage. In 2007 this area was disorganized and several different types of auto fluids were spilled on the ground. This has since been cleaned up and the vehicles removed.</p> <p>Is the salvage area managed with respect to safety and pollution control?</p> <p>No, there is no written safety control plan in place to protect public salvagers. They did clean up this area and it looked much better than during my last visit. Salvagers are only allowed to work in the area when an operator is present.</p>	5	5
5	<p>DISEASE VECTORS AND ANIMALS - <i>Disease vectors, including wildlife and domestic animals, must be controlled so that the public health, safety, or welfare are not endangered by the spread of disease or contact with animals, and that the animals are not harmed by contact with the waste or become a nuisance. 18 AAC 60.230</i></p> <p>Is there any evidence (prints, scat, digging, etc.) of bear, fox, or other animals around the waste?</p> <p>Municipal solid waste is not covered enough to control animal scavenging. I saw at least two different brown bear sows and they had three cubs each with them that have become habituated garbage bears.</p> <p>Were there excessive numbers of birds present? Yes, there were several ravens, crows, and eagles present during my visit.</p> <p>Are there any reports of wildlife being harmed or conditions that are likely to harm wildlife?</p> <p>No</p>	5	0

#	Part Seven: General Operatic	POINTS	
		Possible	Score
6	<p>BIRD HAZARD – <i>If the landfill is within 5,000 feet of any airport, or 10,000 feet of an airport used by turbojet aircraft, it must be designed and managed so that it does not pose a bird hazard to aircraft. 18 AAC 60.305</i></p> <p>NOTE - This question does not apply if the stated conditions do not exist. NA</p> <p>What types and numbers of birds did you observe?</p> <p>Do the birds appear to present a hazard to aircraft?</p> <p>No</p>	5	NA
7	<p>INACTIVE AREAS - <i>Areas that have not received waste for more than 90 days, but have not yet reached the final capacity or elevation, must receive an intermediate cover. The area must be covered with 12 inches of soil and graded to prevent ponding and erosion. 18 AAC 60.243</i></p> <p>Have inactive areas been appropriately covered and graded? No</p> <p>Scrap metal, appliances and appliance parts and other household solid waste that were separated from municipal waste stream and piled in the middle of the landfill site have been cleaned up and shipped out.</p>	10	5
8	<p>STABILITY – <i>The landfill should be graded and shaped to preserve the integrity of the landfill. 18 AAC 60.320</i></p> <p>Do any slopes appear to be unstable or potentially unstable? No</p> <p>Are any slopes abnormally steep? No</p>	10	10
9	<p>MAINTENANCE AND REPAIR - <i>The landfill must maintain structures and components of the facility, and repair any structural changes or damage to the facility, including the liner, leachate system, and other components. 18 AAC 60.815</i></p> <p>There is still no potable water available at the facility building for handwashing or toilet facilities. I did see evidence of the community's attempt to add an underground potable water tank.</p> <p>Are there signs of damage to any component of the facility? No signs of damage to the components of the facility.</p>	10	8

Part Eight: Special Waste

This section should be completed at the landfill facility during the site visit.

#	Part Eight: Special Waste	POINTS	
		Possible	Score
1	<p>NON-RACM HANDLING - <i>Non-RACM waste must be handled so that it does not become friable. It must be covered within 24 hours using procedures that prevent the release of asbestos fibers. 18 AAC 60.450</i></p> <p>Does the facility have a clear policy for handling non-RACM waste?</p> <p>They do not accept RACM and non-RACM waste. This facility should not accept RACM or non-RACM unless it is permitted by ADEC and approved to do so.</p>	5	4
2	<p>MEDICAL WASTE - <i>Medical waste may not be disposed at the landfill unless it has been treated by an approved process. This includes waste from medical facilities OR individuals. 18 AAC 60.030</i></p> <p>Is treated medical waste accepted?</p> <p>No, medical waste is bagged at the clinic and sent to Entech Corporation in Anchorage, AK.</p> <p>How does the landfill verify treatment of the waste?</p> <p>No verification is needed because waste is sent out of the community and not disposed of in the landfill.</p>	5	N/A
3	<p>LIQUID WASTE - <i>Liquid waste may not be disposed at the landfill, with the exception of small quantities (one gallon or less) of containerized household waste. This includes leachate and baler squeezings, unless recirculation has been approved under an RD&D permit. 18 AAC 60.360</i></p> <p>Are any prohibited liquids disposed at the landfill?</p> <p>No</p> <p>Are any fluids generated at the landfill (leachate or baler squeezings)?</p> <p>The community bought a new baler to use at the landfill but it was not in use at the time of my inspection last year and still not in use this year.</p> <p>If so, how are they disposed?</p>	10	10

#	Part Eight: Special Waste	POINTS	
		Possible	Score
4	<p>SEPTAGE – <i>The landfill may accept up to 2,500 gallons of septage or honey bucket waste per day. The septage must be deposited into separate trenches. Only one trench may be constructed and in use at any time. Trenches may not overflow and waste must not be more than four feet in depth. Hydrated lime must added on a regular basis. 18 AAC 60.365</i></p> <p>Does the facility accept septage or honey bucket waste?</p> <p>No</p> <p>Is the waste properly disposed of into a separate trench?</p> <p>N/A</p> <p>Are trenches in good condition, not overflowing, and not deeper than four feet?</p> <p>N/A</p> <p>Is hydrated lime added on a regular basis?</p> <p>N/A</p>	30	N/A
5	<p>VEHICLES - <i>Vehicles may not be disposed at the landfill unless all fluids and batteries have been removed. If undrained vehicles, or the fluids and batteries removed from them, are stored at the landfill for later disposal or recycling, they must be managed to prevent release of fluids. 18 AAC 60.035, 18 AAC 60.010</i></p> <p>Are vehicles disposed at the landfill? Yes.</p> <p>Are all fluids and batteries removed prior to disposal? How is this confirmed?</p> <p>Facility operators have been instructed to remove fluids prior to disposal. The makeshift vehicle lift station that was used to raise the vehicle off the ground to make fluid removal easier last year was removed.</p> <p>Are the vehicles disposed in a stable location?</p> <p>The junk vehicles were removed from the community prior to my inspection this year.</p> <p>If vehicles or the fluids/batteries removed from them are stored at the landfill, how does the landfill ensure no fluids are released?</p> <p>Motor oil is recycled at the waste oil burner at the landfill.</p>	10	10

Part Nine: Surface Water Controls/Impacts

This section should be completed at the landfill facility during the site visit.

#	Part Nine: Surface Water Controls/Impacts	POINTS	
		Possible	Score
1	<p>SURFACE WATER, PONDING, AND STORMWATER, - Waste may not be placed in surface water. The landfill must minimize contact between stormwater and waste. Landfill surfaces should be graded to prevent ponding, and all ponded water must be removed within 30 days. 18 AAC 60.225</p> <p>Is there any evidence of waste in contact with surface water?</p> <p>Yes, there is a large pit adjacent to the public dumpsite area that had several instances of ponded water that contained waste. There is also a pond of water within 10 feet of the entrance of the landfill where I saw a sow and her three cubs playing.</p> <p>If there is ponded water at the landfill, has it been 30 days or more since the last significant rainfall?</p> <p>Yes.</p>	10	0
2	<p>LEACHATE SEEPS - Leachate seeps must be prevented, or contained and controlled. 18 AAC 60.225</p> <p>Are there any visible leachate seeps?</p> <p>No</p> <p>What measures have been taken to contain and control the seeps?</p>	30	30
3	<p>PERMAFROST - If the landfill is located on permafrost, it must be designed and operated so that the permafrost remains frozen. If the landfill settles and water is pooling, the operator must take corrective action. 18 AAC 60.227</p> <p>Are there any indications that permafrost is thawing (pooled water or settlement)?</p>	10	N/A
4	<p>WETLANDS - If the landfill is located in or near a wetland, it may not cause or contribute to significant degradation of the wetlands. 18 AAC 60.315</p> <p>No</p> <p>Is there any evidence of stress to plants or wildlife as a result of landfill operations?</p> <p>No</p>	10	10

Part Ten: Monitoring Requirements

This section should be completed **ONLY** if the landfill conducts groundwater, surface water, gas, thermal, or other types of monitoring (other than visual monitoring). This section should be completed at the landfill facility during the site visit.

#	Part Ten: Monitoring Requirements	POINTS	
		Possible	Score
1	<p>MONITORING - A facility may be required to monitor groundwater, surface water, gas, or other parameters. 18 AAC 60.810, 18 AAC 60.830, 18 AAC 60.350, permit condition</p> <p>Is the landfill monitored as required? The Yakutat landfill is not permitted and ADEC has not required them to monitor up to this point.</p>	30	N/A
2	<p>MONITORING REPORTS – The operating record must contain copies of all monitoring data and reports. Groundwater and surface water reports MUST be submitted to ADEC. Submission of gas and other monitoring reports may be required by permit. 18 AAC 60.810, 18 AAC 60.830, permit condition</p> <p>NOTE to inspector: The project manager should be reviewing and communicating about monitoring reports as they are received.</p> <p>Are landfill monitoring reports recorded in the operating record as required?</p> <p>Does the facility submit the required monitoring reports to ADEC?</p> <p>Do monitoring reports address all required types of monitoring?</p> <p>Are monitoring reports complete and contain required analyses?</p>	10	N/A
3	<p>MONITORING LOCATIONS – Monitoring must be conducted at approved locations. Surface water monitoring sites must be properly maintained. Groundwater monitoring wells must be properly maintained. 18 AAC 60.810, 18 AAC 60.825, permit</p> <p>Are surface water monitoring sites clearly identified and marked?</p> <p>This facility does not have any required ADEC surface or ground water monitoring sites.</p> <p>Are surface water monitoring sites located according to the approved plan?</p> <p>Are monitoring wells in good condition and locked?</p> <p>Are other monitoring devices well maintained and located as required?</p>	10	N/A

Part Eleven: Asbestos Requirements

This section should be completed ONLY if the landfill accepts RACM waste. This section should be completed at the landfill facility during the site visit.

#	Part Eleven: Asbestos Requirements	POINTS	
		Possible	Score
1	<p>ASBESTOS RECORDS – <i>The landfill must maintain asbestos shipment records for each load of RACM. Records must include contact information for the waste generator and waste transporter, the amount (cy) disposed, and the date of receipt. The landfill must maintain an up-to-date map or site plan showing the boundaries of the asbestos cell. The landfill must maintain up-to-date records of the amount of waste in the RACM cell, including depth and the total volume. 18 AAC 60.450</i></p> <p>Does the landfill maintain complete asbestos shipment records for each load of RACM received? According to Property Maintenance Manager Steve Madej, the Yakutat facility does not accept RACM or non-RACM items at this time. The Solid Waste Management Plan does not address this waste. Steve Madej did tell me that he thought they accepted asbestos at one time a long time ago but they don't have a record or map indicating where it's buried.</p> <p>Does the operating record contain an adequate, up-to-date map of the asbestos cell? No.</p> <p>Does the operating record contain up-to-date information about the depth and total volume of RACM in the asbestos cell? No.</p>	5	N/A
2	<p>RACM CELL- <i>RACM must be disposed of in a separate area. Access to the asbestos site must be restricted, and there must be no visible emissions. 40 CFR 61.154</i> <i>Asbestos loads must be inspected and handled to insure that all friable asbestos is sealed in leak-proof containers, deposited in the asbestos cell without damaging the containers, and covered by the end of the day with 6 inches of soil. 18 AAC 60.450</i></p> <p>Is RACM disposed of in an area separate from MSW?</p> <p>Is there evidence of visible emissions?</p> <p>What measures are used to prevent public access to the asbestos disposal area?</p> <p>Are any exposed or broken bags evident?</p> <p>Has adequate cover been applied to the waste?</p>	25	N/A

Part Twelve: Additional Permit Requirements

This section should be completed at the landfill facility during the site visit.

#	Part Eleven: Additional Permit Requirements	POINTS	
		Possible	Score
1	ADDITIONAL PERMIT REQUIREMENTS Is the facility complying with the additional permit requirements listed in Part One, Question 11? The Yakutat landfill facility is not permitted with ADEC.	10	0

Additional Comments

Part #	Question #	Comment