

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION DIVISION OF ENVIRONMENTAL HEALTH SOLID WASTE AND PESTICIDES PROGRAM

SEAN PARNELL, GOVERNOR

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Sandra.Woods@alaska.gov

October 7, 2011

**REQUESTED CERTIFIED MAIL
RETURN RECEIPT
#7003 1680 0004 2908 0891**

Tom Hall, Owner
Haines Sanitation dba Community Waste Solutions
PO Box 575
Haines, AK 99827

RE: Inspection of the Haines Class III Municipal Solid Waste Disposal Facility at Haines, Alaska
Current Permit #SW3A18-16

Dear Tom:

I want to thank your operator, Bill Williamson for assisting me in conducting an inspection of your Class III municipal solid waste composting facility located in Haines, Alaska. I have enclosed a copy of the inspection checklist with this letter. Your overall scoring for this inspection is 47%. You received a score of 76 out of a total possible of 160.

Over the last year, I have been working closely with you regarding numerous complaints that the Department has received from the residents of Haines. These problems include but are not limited to; bears feeding on raw garbage at the landfill, garbage trucks leaking fluids during pickup, odors from raw and uncovered garbage, and litter. Initially it appeared that you were making progress on rectifying your operation issues but during my most recent inspection, I observed several egregious problems that indicate you are in violation of specific conditions of your permit and Alaska's solid waste regulations under 18 AAC 60.

I observed the following noncompliance items during my inspection of your facility.

Permit Specific Condition #1: The permittee shall prohibit the disposal of municipal solid waste into the landfill that does not meet the compost requirements and the 40 CFR 503 standards listed in Appendix 4.2 of the Compost Monitoring plan dated December 1, 2006.

While inspecting your facility, I observed that your composting operation system is no longer in operation as required by your permit. Your current operator is no longer able to move or unload the compost digesters because the facility's roll-off truck needs maintenance and is out of operation and has been so all summer. Without the roll-off truck to empty the compost digesters, they have been sitting full of solid waste next to the Material Handling Building since July 2011. The operator has been attempting to make do by composting garbage using some empty connex containers located in the middle of landfill and then emptying them after 14 days of "composting" and putting the waste in the upper eastern area of the landfill footprint. Using this method of "composting", you have no way of

knowing if the waste has met the requirement for vector attraction or the Process to Further Reduce Pathogens (PFRP) under 40 CFR 503. There also appears to be little or no removal of recyclable materials prior to the grinding process such as plastics, aluminum or metals (see photos 1 and 2). This is in direct violation of your permit specific condition #1.



Connex containers full of solid waste.



Raw garbage disposal in active working face.

Permit Specific Condition #5: The permittee shall obtain written permission from the property owner to leave the leachate treatment collection tank in its current location outside the northwest corner of the landfill property and shall make any repairs necessary to the leachate treatment collection tank to provide treatment to water leaving the landfill by September 30, 2011.

If the permittee does not obtain the property owner's permission, the permittee shall move the leachate treatment collection tank located outside the northwest corner of the landfill property boundary to a location within the boundary of the landfill property owned by the permittee and shall make any repairs necessary to the leachate treatment collection tank to provide treatment to water leaving the landfill by September 30, 2011.

18 AAC 60.225(d)(3) The owner or operator of an inert waste landfill, an asbestos landfill, or a Class III MSWLF that meets the standards of 18 AAC 60.300(c)(3)(B) shall (3) prevent, contain, or control visible leachate seeps at the boundary of the waste management area if the department determines that leachate control measures are necessary to prevent a potential threat to public health, safety, welfare.

There is still leachate seeping into the down gradient ditch in the northwest area of the landfill footprint. Your leachate collection system is still not in operation and not located on property that you own. You are in now in violation of the conditions of your 2011 renewed permit that stipulates that you must obtain written permission from the City of Haines, the current property owner, to leave the leachate treatment collection tank in its current location outside the northwest corner of the landfill property and then make any and all repairs necessary to the leachate treatment collection tank to provide treatment to water leaving the landfill by September 30, 2011; or if you did not obtain the property owner's permission, you must move the leachate treatment collection tank to a location within the boundary of

the landfill property you own and then make any repairs necessary to the leachate treatment collection tank to provide treatment to water leaving the landfill.



Leachate collecting at the top of the nonworking Leachate Collection Treatment Tank.



Ponded leachate.

18 AAC 60.225(b)(1) Except for an inert waste landfill, an asbestos landfill, or a Class III MSWLF that meets the standards in 18 AAC 60.300(c)(3)(B), the owner or operator of a landfill shall (1) remove all ponded water that is in contact with waste within seven days after the formation of the pond unless another dewatering schedule is specified in a permit issued under AS 46.03.100 and this chapter;

In February of this year, you built a culvert drain system through the middle of your landfill in an attempt to divert the spring that flows into it. This appeared to work until recently. During this inspection of your landfill, there was water flowing once again through the waste in the active working face creating large areas of ponded water filled with waste and sludge. Leachate is created when water flows through waste, or otherwise comes into contact with the waste. There is a still a run-on problem with water running directly into the landfill from an up-gradient spring. It's possible that your diversion culvert may need regular maintenance to be effective. Whatever the reason, it is your responsibility to determine the problem and resolve it.



Ponded water throughout the landfill



The above listed noncompliance issues have been an ongoing problem that you are going to have to resolve in a very timely manner or the Department will have to start a more formal course of action that could include a Notice of Violation and a Compliance Order By Consent. Persistent noncompliance could also be a reason to revoke your permit and close down your operation. You have 30 days or until November 10th, 2011 to present an item-by-item plan to me on how and when you are going to resolve the above noncompliance issues. The adequacy and completeness of your plan will be considered in determining the need for further enforcement action.

You may contact me at (907)465-5318 or Sandra.woods@alaska.gov if you wish to discuss any of the above items in this letter.

Sincerely,

A handwritten signature in cursive script that reads "Sandra Woods".

Sandra M. Woods
Environmental Specialist

cc: Judy Beauchemin-Hall, Secretary-Treasurer
Bill Williamson, Solid Waste Operator

Enclosures

Facility:**Haines Sanitation dba Community Waste
Solutions****Facility Owner (Co. or Org.):**

Tom Hall, Owner

Address: PO Box 575

City: Haines, AK

Zip: 99827

Phone: 907-973-2025

Contact name: Tom Hall, Owner

Email: tom@klondikegolddredge.com**Operator (Co. or Org.):**

Bill Williamson, Operator

Address: PO Box 575

City: Haines, AK

Zip: 99827

Phone: 907-305-5005

Contact name: Bill Williamson, Operator

Email: communitywastesolutions11@gmail.com**Location:**

Haines, AK Lots 20 and 21, NE 1/4, SW 1/4, NE 1/4,

MRTS: S: 2 T: 31S R: 59E M: Copper River**GPS Coordinates:**

(right corner when facing entry)

Land owner:

Same as Facility Owner

Address:

City:

Zip:

Phone:

Contact name:

Email:

Other contacts:

Misty Anderson, office manager

misty@communitywastesolutions.com

907-766-2736

Inspection

Inspection date

10/3/2011

Rainfall (last month):

10.70"

Inspection Participants:

Bill Williamson, Operator

Sandra Woods, ADEC

Notes:

Community Waste Management Index										
#	Landfill Site Control								Comments	
1	Landfill Road Maintenance	Landfill access and onsite roads under the operator's control must be kept passable and safe for vehicles during normal hours of operation. 18 AAC 60.220								
		0	1	2	3	4	5	NA		
2	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. Signs should identify the owner or operator, hours of operation, and emergency contacts. Signs should also direct users where to dispose of special wastes. 18 AAC 60.240								I notified operator that their signage was incomplete and needed to be updated.
		0	1	2	3	4	5	NA		
3	Access Control	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								
		0	1	2	3	4	5	NA		

#	Burning								Comments	
1	Burn Unit	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. 18 AAC 60.233, 18 AAC 60.355								
		0	1	2	3	4	5	NA		
2	Burn Management	Burning must be contained and controlled and managed to minimize adverse environmental effects and limit the amount of smoke generated. 18 AAC 60.233, 18 AAC 60.355, 18 AAC 50.065(b)								
		0	1	2	3	4	5	NA		
3	Waste Separation	Burning of plastics, asphalts, rubber, tars, oily wastes, or other materials in a way that gives off black smoke is prohibited. 18 AAC 50.065(b)								
		0	1	2	3	4	5	NA		

# Landfill Operations											Comments
1	Operator										
		0	1	2	3	4	5	NA			
2	Equipment										Roll off truck needs maintenance and repair in order to operate within composting operation plan. This truck has been inoperable for some time.
		0	1	2	3	4	5	NA			
3	Compaction										
		0	1	2	3	4	5	NA			
4	Cover	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 observed a brown bear and several paw prints during my inspection.
		0	1	2	3	4	5	NA			
5	Working Face	The working face must be kept as small as practical. 18 AAC 60.345									
		0	1	2	3	4	5	NA			

Landfill Operations II										Comments
#										
6	Slopes & Grading	The landfill should be graded and shaped to preserve the integrity of the landfill. 18 AAC 60.320								
		0	1	2	3	4	5	NA		
7	Vector & Nuisance Control	Dust, odor, noise, traffic, other effects from the landfill, and disease vectors, including wildlife and domestic animals, must be controlled so that the public health, safety, or welfare are not endangered or they create a nuisance. 18 AAC 60.230, 18 AAC 60.233								I observed a brown bear and several paw prints during my inspection.
		0	1	2	3	4	5	NA		
8	Litter	Litter must be controlled so that it does not become a nuisance or hazard 18 AAC 60.233, 18 AAC 60.345								Litter is a big problem at this facility.
		0	1	2	3	4	5	NA		
9	Maintenance & Corrective Action	The landfill must maintain structures and components of the facility, and repair any structural changes or damage to the facility and clean up any improperly disposed waste. 18 AAC 60.815								Spring water diversion culvert built but not currently working.
		0	1	2	3	4	5	NA		
10	Inactive Areas	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								
		0	1	2	3	4	5	NA		

Landfill Water Impacts										Comments
#										
1	Leachate	Leachate seeps must be prevented, or contained and controlled. 18 AAC 60.225								Leachate and water run on is a big problem at this facility.
		0	1	2	3	4	5	NA		
2	Surface & Storm Water Controls	A landfill must be constructed and operated so that seasonal flooding is temporary. Waste may not be placed in surface water. The landfill must minimize contact between stormwater and waste. Surfaces should be graded to prevent ponding, and ponded water is removed within 30 days. 18 AAC 60.225								Ponded water throughout landfill active working face.
		0	1	2	3	4	5	NA		
3	Impact to Permafrost or Wetlands	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 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								Water flowing from landfill to downgradient wetland locations is affected.
		0	1	2	3	4	5	NA		

Special Waste Management										Comments
1	Septage	The landfill may accept septage or honey bucket waste if it is deposited into separate trenches, less than 4' in depth, and the trench is maintained not to overflow. Hydrated lime must added to a pH of 12(30 min.) on a regular basis. 18 AAC 60.365								
		0	1	2	3	4	5	NA		
2	Animal Carcasses									
		0	1	2	3	4	5	NA		
3	Household Hazardous Waste								No current evidence of HHW collection from waste before grinding and landfilling.	
		0	1	2	3	4	5	NA		
4	Liquid Waste	Liquid waste, including kitchen grease, may not be disposed at the landfill, with the exception of small quantities (one gallon or less) of containerized household waste. 18 AAC 60.360								
		0	1	2	3	4	5	NA		
5	C&D Non-RACM	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. A Class III landfill may not accept RACM without a separate permitted RACM cell. 18 AAC 60.450								
		0	1	2	3	4	5	NA		

Special Waste Management II												Comments
#		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										
6	Salvage Area	0	1	2	3	4	5	NA				
7	Used Oil	0	1	2	3	4	5	NA				
8	Vehicles	Vehicles may not be disposed at the landfill unless all fluids and batteries have been removed. If undrained vehicles 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										
		0	1	2	3	4	5	NA				
9	Freezers & Refrigerators CFCs	0	1	2	3	4	5	NA	I saw white goods in active working face of landfill and not separated from waste stream.			
10	Lead Acid Batteries	0	1	2	3	4	5	NA				

#		Administration							Comments
1	Permit	A landfill is required to have a permit; a copy of the permit application and current permit must be kept in the landfill files. 18 AAC 60.200, 18 AAC 60.235							
		0	1	2	3	4	5	NA	
2	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							
		0	1	2	3	4	5	NA	
3	Operations Plan	The operations plan should be used as a guide for day to day operation and seasonal issues at the landfill. A copy must be kept in the operating record. 18 AAC 60.210, 18 AAC 60.235							It's difficult for the operator to follow the composting operations at this facility due to lack of equipment maintenance and repair.
		0	1	2	3	4	5	NA	
4	Facility Design & Development Plan	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. Waste may not be placed within 50' of property boundary, 500' of a drinking water source, or 10' ft. of groundwater (unless built on a 2' pad). 18 AAC 60.233, 18 AAC 60.210							Leachate treatment and collection system not within facility boundary.
		0	1	2	3	4	5	NA	
5	Closure Plan	A landfill is required to have a plan for closure that includes: closure design & construction, plan for land-use after closure, closure cost estimates, closure reporting requirements, post-closure monitoring, and permanent site markers. 18 AAC 60.210, 18 AAC 60.390							
		0	1	2	3	4	5	NA	

Waste Management Improvement Programs												Comments
1	Backhaul Program											
		0	1	2	3	4	5	NA				
2	Collection Program											
		0	1	2	3	4	5	NA				
3	Fees											
		0	1	2	3	4	5	NA				
4	Operator Training											Current operator is attending RALO training 10/11-13/2011.
		0	1	2	3	4	5	NA				
5	Education & Outreach											Owner has a damaged reputation with the community. There has been no community outreach in the past few years.
		0	1	2	3	4	5	NA				

Community Waste Management Index

Landfill Site Control							
#	Category	0	1	2	3	4	5
1	Landfill Road Maintenance	Landfill access and onsite roads under the operator's control must be kept passable and safe for vehicles during normal hours of operation. 18 AAC 60.220					
		Landfill not accessible for more than one month per year	Landfill usually accessible, roads barely passable, history of being inaccessible for more than one month	Landfill generally accessible year round, history of being inaccessible for less than one month	Landfill generally accessible year round, history of minor problems.	Landfill accessible year round, roads to and in landfill occasionally maintained	Landfill accessible year round, roads to and in landfill actively maintained.
2	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. Signs should identify the owner or operator, hours of operation, and emergency contacts. Signs should also direct users where to dispose of special wastes. 18 AAC 60.240					
		No signs at the landfill entrance	Signs in poor condition, unreadable	Sign at entrance with incomplete information.	Signs at entrance identifies owner, emergency contacts, prohibited wastes, and hours.	Proper signs at entrance. Also signs with other information necessary for landfill operations (eg. Dumping areas, traffic flow, restrictions, etc.)	Proper signs at entrance. Also signs with other information necessary for landfill operations and alternative disposal options.
3	Access Control	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					
		Open access, signs of target shooting or recreational use, and/or unauthorized dumping	Barriers in poor condition, evidence of unauthorized use or dumping	Functional barriers, but open gates, evidence of unauthorized use or dumping	Barriers in poor condition, no evidence of unauthorized use or dumping	Functional barriers, but open gates, no evidence of unauthorized use or dumping	Functional barriers, locking gate, restricted hours, no evidence of unauthorized use or dumping.

Community Waste Management Index

Burning							
#	Category	0	1	2	3	4	5
1	Waste Separation	Burning of plastics, asphalt, rubber, tars, oily wastes, or other materials in a way that gives off black smoke is prohibited. 18 AAC 50.065(b)					
		No separation of non-burnable waste - everything burned. No effort to prevent black smoke.	No separation of non-burnable waste. Some effort to reduce smoke and prevent black smoke.	Some separation of non-burnable waste. Some effort to prevent black smoke.	Non-burnable wastes separated by operator at landfill. Burning only when wind direction is away from community. No black smoke.	Non-burnable wastes separated by residents at landfill per posted separation rules. Disposal area for non-burnable waste. No black smoke.	Non-burnable wastes separated by residents at home. All non-burnable waste properly disposed. No black smoke.
2	Burn Management	Burning must be contained and controlled and managed to minimize adverse environmental effects and limit the amount of smoke generated. 18 AAC 60.233, 18 AAC 60.355, 18 AAC 50.065(b)					
		No management of burning - waste dumped and lit by users	Limited burn management - some directive to community when NOT to light waste. No effort to keep waste dry.	Signs onsite direct users how to load waste and proper conditions to light waste.	Burn lit by operator only in appropriate weather conditions, burn not monitored, no effort to keep waste dry or maximize burn temperature	Burn lit by operator only in appropriate weather conditions, periodically monitored. Some effort to keep waste dry to maximize burn temp.	Burn lit by operator only in appropriate weather conditions, monitored by operator throughout burn. Waste kept dry, burn unit operated to maximize temp.
3	Burn Unit	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. 18 AAC 60.233, 18 AAC 60.355					
		No burn unit, evidence of open burning on the ground	Burn unit onsite - limited functionality or use. e.g. ash not emptied, poor unit maintenance.	Burn unit fairly functional, ash removed infrequently, some maintenance.	Burn unit functional, ash removed periodically, box maintained.	Burn unit functional, ash removed regularly, box well maintained.	Enclosed burn unit functional. Ash removed regularly, box well maintained.

Community Waste Management Index

Landfill Operations

#	Category	0	1	2	3	4	5
1	Operator	No operator	No dedicated operator, landfill is managed in "emergency"	No dedicated operator, landfill is managed by city/tribe "as needed"	Part-time operator addresses some waste management	Operator allocated enough hours to address most waste management	Operator(s) allocated enough hours for all waste management.
2	Equipment	No equipment	Broken Equipment	Some undersized equipment available periodically to clean-up landfill	Appropriately sized equipment available periodically to clean up landfill	Undersized equipment available regularly to operate and maintain landfill.	Appropriately sized equipment available regularly to operate and maintain landfill.
3	Working Face	No designated working face, waste spread over entire landfill	Some attempt to keep waste to an specific area	Waste mostly in one area of the landfill	Dumping area identified, most waste limited to large dumping area	Dumping area identified, most waste limited to reasonably sized dumping area	Clearly identified dumping area. Working face kept as small as practical
4	Compaction	No efforts to compact waste.	Poor or infrequent compaction efforts	Compaction 1-3 times per year with good results	Compaction at least 4 times per year with good results	Regular (at least once per month) compaction with wheeled vehicle or skid steer	Regular compaction with 4-6 passes of D-4 or larger tracked vehicle.
5	Cover	No cover applied	Some cover applied in the past, no identified cover source.	Some cover applied in past, cover source available.	Cover applied periodically, but does not control issues.	Cover applied as needed, cover material not stockpiled at landfill	Cover applied as needed, cover stockpiled at landfill

The working face must be kept as small as practical. 18 AAC 60.345

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

Community Waste Management Index

Landfill Operations II

#	Category	0	1	2	3	4	5	
		The landfill should be graded and shaped to preserve the integrity of the landfill. 18 AAC 60.390, 18 AAC 60.243						
6	Slopes & Grading	Slopes at the landfill contribute to ponding, erosion & slope instability.	Some efforts to grade landfill, but ponding, erosion or instability is a problem.	No efforts to grade landfill, but slopes do not appear to be contributing to ponding, erosion or instability.	Some efforts to grade landfill, minor issues with ponding or erosion.	Landfill graded, no ponding, erosion or instability evident.	Landfill actively graded to ensure stability, protect from erosion, prevent run-on, and promote runoff of storm or surface water	
7	Vector & Nuisance Control	Dust, odor, noise, traffic, other effects from the landfill, and disease vectors, including wildlife and domestic animals, must be controlled so that the public health, safety, or welfare are not endangered or they create a nuisance. 18 AAC 60.230, 18 AAC 60.233	Evidence of regular animal traffic, humans/Vehicles acting as a vector, and other health or nuisance issues.	Clear vector or health issues, some nuisance issues present.	Minor vector or health issues, clear nuisance issues present.	Minor vector or health issues, Minor nuisance issues present.	No evidence of vector or health issues. Minor nuisance issues present	No evidence of animals or other vectors, other health issues & nuisance issues controlled.
8	Litter	Litter must be controlled so that it does not become a nuisance or hazard. 18 AAC 60.233, 18 AAC 60.345						
		No clean-up evident	Community Spring Green up/Clean-up	Spring clean-up and operator picks litter once a year	Spring clean-up, litter picked more than once a year, but less than monthly	Spring clean-up, operator picks litter monthly	Spring clean-up, operator picks litter monthly, community education on litter	
9	Maintenance & Corrective Action	The landfill must maintain structures and components of the facility, and repair any structural changes or damage to the facility. 18 AAC 60.815						
		Significant damage that may impact health, safety or the environment. No plan for corrective action	Significant damage that may impact health, safety or the environment. Plan for corrective action underway	Significant damage that may impact health, safety or the environment. Corrective action being implemented	Minor damage at the facility, no plan for corrective action	Minor damage at the facility, corrective action underway.	No structural issues.	
10	Inactive Areas	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 Note, this is not closure. If an area is closed...or						
		Open dumping, no distinction between active & inactive areas	Distinct inactive area uncovered	Inactive areas covered with less than 12" of soil.	All inactive areas covered with 12", significant issues with ponding or erosion.	All inactive areas covered with 12", some minor issues with ponding or erosion.	All inactive areas covered with at least 12" of soil and graded.	

Community Waste Management Index

Landfill Water Impacts

#	Category	0	1	2	3	4	5
		Leachate seeps must be prevented, or contained and controlled. 18 AAC 60.225					
1	Leachate	Leachate seeps are present at the landfill, no effort to contain or control	Leachate seeps at the landfill, unsuccessful effort to contain or control	Leachate seeps at the landfill, some success at effort to contain or control	Leachate seeps at landfill are appropriately contained, controlled	No leachate observed, but some conditions likely to cause leachate (waste in contact with water) were observed	No leachate or conditions likely to cause leachate observed.
2	Surface & Storm Water Controls	A landfill must be constructed and operated so that seasonal flooding is temporary in duration. Waste may not be placed in surface water. The landfill must minimize contact between stormwater and waste. Ponded water must be removed within 30 days. 18 AAC 60.225					
		No effort to control water in waste or ponding at landfill.	Some apparent effort to control water in waste and ponding at landfill at one time, but currently ineffective	Some current effort to control water in waste and ponding at landfill, but ineffective	Some effort to control water in waste and ponding at landfill site.	Efforts to control water in waste and ponding at landfill are generally effective.	No evidence of water in waste or ponding at the landfill, berms ditches and other controls are in place and are effective
3	Impact to Permafrost or Wetlands (only for facilities built on permafrost or wetlands)	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 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					
		Permafrost appears to be melting around landfill; or wetland plants around landfill are clearly impacted - No corrective action plan.	Permafrost or wetlands impacted - Corrective action plan under development	Permafrost or wetlands impacted - Corrective action underway but no evidence of improvement	Permafrost or wetlands impacted - Corrective action in place has shown improvement	No clear impacts to permafrost or wetlands, but some indicators (small ponds, leachate, etc.) present.	No indicators or impact to permafrost or wetlands are evident

Community Waste Management Index

Special Waste Management

Category 0 1 2 3 4 5

The landfill may accept septage or honey bucket waste if it is deposited into separate trenches, less than 4' in depth, and the trench is maintained not to overflow. Hydrated lime must added to a pH of 12(30 min.) on a regular basis. 18 AAC 60.365

1	Septage	Honey bucket waste or septage co-mingled with MSW	Honey bucket waste or septage disposed in separate area of landfill	Honey bucket waste and septage in separate trench no lime added	HBW&S in properly constructed trench, lime added infrequently	HBW&S in properly constructed trench, lime added on a regular basis	HBW&S in trench, lime added and pH tested.
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Animal carcasses must be disposed in a manner that does not cause an animal attraction and protects the public health. 18 AAC 60.010

2	Animal Carcasses	Dead animals / subsistence waste co-mingled with MSW	Dead animals / subsistence waste separate area of landfill	DA/SW in separate excavated area no lime added, no cover	DA/SW in separate excavated area no lime added, some cover	DA/SW in separate excavated area lime added periodically, some cover	DA/SW incinerated or disposed in separate excavated area, lime added, covered with 6" cover each day of disposal
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3	Household Hazardous Waste (HHW)	No HHW separation	HHW separation bin available, but not managed or well used.	HHW collection program available, accessible, but not well used	HHW collection program available, accessible, most HHW diverted from LF	Clear options for HHW reuse or separation, program well run, most HHW diverted from LF.	HHW ed. program - alternatives encouraged, collection/reuse program well run, shipped out 1/yr.
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Liquid waste, including kitchen grease, may not be disposed at the landfill, with the exception of small quantities (one gallon or less) of containerized household waste. 18 AAC 60.360

4	Liquid Waste	No identified option for liquids disposal	Free liquids prohibited at LF, some alternatives available, but not clearly identified	Free liquids prohibited at LF, alternative disposal available in village.	Free liquids prohibited at LF, alternatives in village identified at landfill.	Free liquids prohibited at LF, alternatives identified, generally used.	Free liquids prohibited and policed, alternatives identified, and widely used.
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Non-RACM waste must be handled so that it does not become friable. It must be covered within 24 hours without compaction or other treatment to prevent the release of asbestos fibers. A Class III landfill may not accept RACM without a separate permitted RACM cell. 18 AAC 60.450

5	Construction & Demolition Debris (C&D) non-RACM	No controls for C&D, indiscriminantly disposed, no requirements for identifying or managing non-RACM	C&D disposed at working face, no awareness or management of non-RACM	C&D disposed at working face or separate cell, awareness of non-RACM, no cover requirements.	C&D disposed at working face or in separate cell, some management of disposal, aware of non-RACM, usually covered w/in 24 h.	C&D well managed @ working face or in separate cell. Contractors required to ID non-RACM - not allowed or is properly managed	C&D well managed to maximize airspace. Contractors required to ID non-RACM - not allowed or is properly managed
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Community Waste Management Index

Special Waste Management II

#	Category	0	1	2	3	4	5
		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					
6	Salvage Area	Uncontrolled salvaging allowed at working face.	Salvaging at working face only when operator present	Separate salvage area, no apparent organization or management	Separate salvage area, some organization or management.	Salvage area has defined locations for different items, fluids are drained or contained (liner), operated safely.	Salvage area managed well (see 4), items removed for disposal or backhaul regularly
7	Used Oil	No clear option for used oil - likey that it is disposed in landfill.	Some options available to collect used oil, not well managed, oil not reused (eg. Smart Ash burner)	Used oil collected, not well managed, some oil burned for energy. (eg. Steam baths or used oil burners)	Used oil collected, stored properly, shipped out.	Used oil collected in well managed program, burned for energy or recovered as usable product.	Enforced used oil collection, well managed, burned for energy or recovered as usable product.
8	Vehicles	Vehicles disposed in landfill, without fluids/batteries not removed	Vehicles staged at landfill, fluids/batteries not removed, no containment for leaks	Vehicles staged at LF, fluids/batteries removed periodically at landfill, no containment for leaks	Vehicles staged at LF, fluids/batteries removed periodically at landfill, containment for leaks	Vehicles staged at LF, fluids/batteries removed (& confirmed) prior to bringing to landfill	Vehicles staged offsite for backhaul, fluids/batteries removed.
9	Freezers & Refrigerators CFCs	Disposal of white goods not managed, no CFC's removed	Units segregated and staged, no CFC's removed	Units staged, CFC's removed on some units, or no documentation	Units staged, CFC's removed by certified technician from some units and documented	Units staged, CFC's removed by certified technician on all units and documented	Units staged, CFCs removed by cert tech& documented, and prepped to be buried/backhauled
10	Lead Acid Batteries	Lead acid batteries disposed in landfill	Lead acid batteries present in landfill but at least one alternate option available.	Most lead acid batteries collected but poorly stored	Most lead acid batteries collected and stored to prevent leaks and damage	All lead acid batteries collected properly stored	All lead acid batteries collected, properly stored, and regularly shipped out.

Community Waste Management Index

Administration

#	Category	0	1	2	3	4	5
A landfill is required to have a permit; a copy of the permit application and current permit must be kept in the landfill files. 18 AAC 60.200, 18 AAC 60.235							
1	Permit	No effort to permit the landfill at any time.	Some efforts toward getting landfill permitted at one time	Landfill had permit expired more than 1 year.	Landfill has permit expired less than 1 year	Recent significant efforts toward getting the landfill permitted	Landfill has current permit. Permit & application in landfill files
2	Monthly 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					
		No landfill monitoring	Operator report landfill monitored at least once per year, no records.	Operator reports landfill monitored more than once per year, problems & corrective action recorded	Operator reports that landfill monitored at least 4X/yr, only problems & corrective action recorded	Landfill monitored at least 4X/yr, recorded on appropriate form and placed in landfill file.	Landfill monitored monthly, recorded on appropriate form, and placed in landfill files maintained 5 yr
3	Operations Plan	The operations plan should be used as a guide for day to day operation and seasonal issues at the landfill. A copy must be kept in the operating record. 18 AAC 60.210, 18 AAC 60.235					
		No specific operating criteria for the landfill	Some operations outlined in Solid Waste Management Plan	Limited written Operations Plan, out of date, not used.	Written Operations Plan, addresses most requirements, not regularly used, reviewed, or updated.	Written Operations Plan, useful to operator, addresses all requirements, reviewed and updated annually.	Written Operations Plan, useful to operator, addresses all requirements, reviewed and updated annually.
4	Facility Design & Development Plan	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. Waste may not be placed within 50' of property boundary, 500' of a drinking water source, or 10' ft. of groundwater (unless built on a 2' pad). 18 AAC 60.233, 18 AAC 60.217, 18 AAC 60.040					
		No facility design/plan. Landfill is constructed or has expanded to create a compliance issue.	Some plan in SWMP or on file for the general design and expansion of the LF, plan not followed some compliance issues	No facility design/plan. Landfill construction or expansion has not expanded to create compliance issues.	Some plan in SWMP or on file for the general design and expansion of the LF, plan not followed no compliance issues	Documented Plan for design & expansion plan generally followed, some minor changes not recorded - no compliance issues	Documented facility design & expansion plan being followed. No elements out of compliance
5	Closure Plan	A landfill is required to have a plan for closure that includes: closure design & construction considerations, plan for land-use after closure, closure cost estimates, closure reporting requirements, post-closure monitoring, and permanent site markers. 18 AAC 60.210, 18 AAC 60.390					
		No consideration for closure of landfill	Some inclusion of closure plan elements in SWMP or other documentation	Closure plan in place includes most elements, but not updated in many years	Most elements of closure plan in SWMP or other documentation, updated as needed	Closure plan in place includes most elements, updated as needed	Closure plan in place includes all elements; updated as needed.

Community Waste Management Index

Waste Management Improvement Programs							
#	Category	0	1	2	3	4	5
1	Backhaul Program	No effort backhaul	Backhaul of limited wastes (Al cans, batteries), no real effort to divert from landfill, poorly managed storage.	Backhaul of limited wastes, effort to divert from landfill and manage storage	Backhaul of additional wastes (e.g. metals, HHW), effort to divert from landfill and manage storage	Backhaul of prohibited wastes and recyclables, effort to divert, managed storage, stored < 1 year.	Backhaul of prohibited wastes and recyclables, required diversion, well managed storage, stored < 1 year.
2	Collection Program	No collection/self haul	Self haul, collect elders trash	75% self haul, 25% collection	50% self haul, 50% collection	25% self haul, 75% collection	> 75% collection
3	Fees	No collection of fees	< 10% collection rate	10% - 25% collection rate	25% - 50% collection rate	50% - 90% collection rate	> 90% collection rate
4	Landfill Operator Training	No landfill operations or administration training	Former operators or administrators have RALO or equivalent training	Landfill operator or administrator have RALO(eq), recognition of hazardous waste, or backhaul training.	Landfill operator & administrator have RALO(eq), recognition of hazardous waste, or backhaul training.	Landfill operator or administrator have RALO(eq), recognition of hazardous waste, & backhaul training.	Landfill operator & administrator have RALO(eq), recognition of hazardous waste, & backhaul training.
5	Community Education & Outreach	No community education/outreach program for solid waste	Basic education, posters in office, occasional VHF announcement	Basic posters around town, occasional VHF announcement	Posters around town and in school, regular VHF announcement	Community education program. Multiple sources of information.	Designed student and community education, multiple sources of information

