



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

**Department of Environmental
Conservation**

SOLID WASTE PROGRAM

P.O. Box 111800
Juneau, Alaska 99811-1800
Main: 907.465.5318

August 25, 2026

sent via electronic mail

Jason Davendonis
PNW/BC Environmental Protection Manager
WM
c/o Capitol Disposal Landfill
5600 Tongsgard Ct
Juneau, Alaska 99801
jdavendo@wm.com

RE: May 14, 2026, Annual Inspection of Capitol Disposal Landfill in Juneau, Alaska

Dear Mr. Davendonis:

On May 14, 2026, the Alaska Department of Environmental Conservation Solid Waste Program (ADEC) inspected Waste Management's Capitol Disposal Class I Municipal Solid Waste Landfill (CDL) in Juneau, Alaska. I would like to thank Michael Heinstein and Lyn Nobles for hosting the inspection, reviewing records, and facilitating a tour of the facility for Neil Lehner, Olivia Lihou, and myself. I would also like to thank Jason Meadows for meeting with me on July 29 to clarify a few outstanding things that were not covered during the May 14 inspection. Attached is a copy of the 2026 Landfill Inspection Report. The facility received 239 out of 300 total points for an overall score of 79.7%, a decrease from the last inspection. Specific details from the inspection can be found in the enclosed Inspection Report and Photo Log.

It was great to have the opportunity to talk to landfill staff and learn how they approach daily operations. Lynn Nobles, who works at the scales provided ADEC a lot of clarity on how WM screens waste at the scales. We appreciated the time that she took to show us her processes and explain how she goes about her work. Michael Heinstein was covering for Jason Meadows as he was out of town, it was nice to hear about the engineering thought processes that go into the development of this facility, which is what Michael does when not acting as a substitute landfill manager. Throughout the inspection staff were open and accommodating to ADEC staff. Below are a few of the major areas of concern that arose during the inspection,

Leachate management, or the management of water that has come into contact with trash, is one of the hardest tasks in landfill management. This is especially true for a landfill that has no lined cells, is located within a rainforest, and has tidal groundwater influences. In the past year there have been a few issues that have arisen with leachate management. WM has been responsive to community and ADEC feedback about how leachate and stormwater is managed on site. As a whole, the trend at this facility seems to be to move more towards the use of geotextile alternative cover at this landfill, or plastic tarping. In the new active areas, these tarps seem to be a good tool to keep out stormwater from the waste mass to prevent the formation of leachate in the first place. However wildlife

Mr. Jason Davendonis

May 14, 2026, Annual Inspection of Capitol Disposal Landfill in Juneau, Alaska

August 25, 2026

Page 2 of 2

interactions with these tarps seem to be a system weak point, they do not seem to be deterring birds or bears from accessing the waste. In the historic areas of the landfill leachate sumps were proposed in 2025, it appears that only one has been installed since 2024. These sumps pump the leachate to the City and Borough of Juneau wastewater collection system to be treated at the Mendenhall Wastewater Treatment Plant. For leachate that daylight at this facility, a leachate seep, it is managed on the surface of the facility by appropriating stormwater infrastructure. That stormwater infrastructure is then effectively used as a surface leachate management system. Historic areas of the landfill appear to still have leachate seep issues. From ADEC's understanding, more waste will be placed in the historic areas of the landfill soon.

Birds at this facility have been a major vector for litter across the landfill and in the surrounding neighborhood. During the May 14 inspection a large amount of litter was present in the drainage ditch along the eastern side of the landfill. This ditch had noticeably less litter during the July 29 site visit. Please ensure that litter pick up at this facility occurs promptly and no litter is allowed to accumulate in bodies of water. Ensure that covering practices are sufficient to prevent bird access to waste.

Part of the changes to leachate and stormwater management on this site involve the "West Berm" development at this facility. The West Berm development brings a portion of the historic landfill up to grade with the rest of the facility, providing a strong foundation for the future vertical landfill development at this site. This project changes how stormwater is managed at this facility, changing an outfall of the stormwater system and reducing the stormwater detention basin capacity. As noted above, there is a history of surface management of leachate at this site, appropriating stormwater infrastructure. With reduced volume capacity in the stormwater infrastructure, ADEC has concerns that pivoting the system to a leachate collection system will be difficult and may result in leachate overflow events. Engineering reports provided by WM to ADEC have stated that the new system will be adequate for stormwater management at this site.

Part of the West Berm development involved temporary removal of a large portion of the permitter fence. This fence is a relatively new development, with the permeant chain-link fence built in 2023 and being partially electrified in 2025. Prior to this, the facility had no infrastructure to prevent wildlife access to the facility. After the electric fence was installed, there appeared to be a great reduction in the number of bears present at this facility. There were noted weak portions of the fence, the portion along the adjacent AELP property was not electrified and seemed to be a weak spot, and the main gate of the facility has no wildlife deterrence system. Some of the new fencing had portions that bears were able to dig under, which WM and their contractors addressed by fortifying the weak spots. There are concerns that during the development of the West Berm, bears have access to the facility after hours and on days when the facility is not staffed, this was discussed during the July 29 meeting. Alaska Department of Fish and Game (ADFG) staff have witnessed bears active in the facility after business hours, four bears were noted on an unexposed active face in the early hours of today, August 25, 2026. Bears should not have access to waste and not become habituated to feeding in a landfill. ADEC and ADFG staff are planning a site visit to CDL on September 9, 2026. Please be prepared to show what interim measures have been taken to prevent bear access to the facility after hours. If at that time we do not see a significant effort put forth by WM to address this issue, ADEC will be requesting additional steps will be required. In the fall bears

Mr. Jason Davendonis

May 14, 2026, Annual Inspection of Capitol Disposal Landfill in Juneau, Alaska

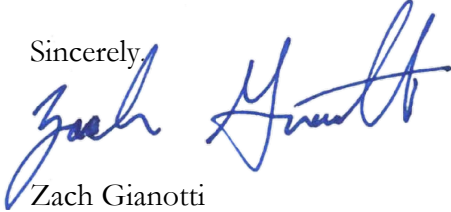
August 25, 2026

Page 3 of 3

enter a period of hyperphagia, a non-stop urge to eat, to prepare for winter hibernation. It is crucial that the landfill is not accessible to bears during this period. Bears eating human refuse can get trash bezoars, indigestible masses of synthetic wastes, resulting in indigestion, starvation, or death.

For additional inspection details please refer to the enclosed Inspection Report and Photo Log. Please feel free to contact me by telephone at (907) 465-5318 or by email at zach.gianotti@alaska.gov with any solid waste questions.

Sincerely,



Zach Gianotti
Technical Specialist

Enclosure: May 14, 2026, Inspection Report and Photo Log

cc: Jasper Boas, WM via jboas@wm.com
Jason Meadows, WM via jmeadow2@wm.com
Marc W. Pratt, USDA WS via marc.w.pratt@usda.gov
Carl Koch, ADFG via carl.koch@alaska.gov
Stephanie Samaniego, ADFG via stephanie.samaniego@alaska.gov
Neil Lehner, ADEC via neil.lehner@alaska.gov
Olivia Lihou, ADEC via Olivia.lihou@alaska.gov



Figure 1. Facility entrance/exit for scales and recycling and HHW facility.



Figure 2. The northeast portion of the landfill has synthetic intermediate cover that appears to be functioning well in heavy rain.



Figure 3. Stormwater infrastructure along the north east side of the landfill.



Figure 4. Major litter issues along the ditch adjacent to the landfill, historic litter issues have been present in this area. Most litter is believed to be transported by eagles. This area was significantly improved July 29, 2026.



Figure 5. The leachate detention pond in the southwest of the facility is lined.



Figure 6. The leachate detention pond in the southwest of the facility has a level that overtopped the liner.



Figure 7. WM built an expansion area for the leachate detention pond that was unlined and therefore not approved by ADEC.



Figure 8. Leachate detention pond with landfill in background including historic waste in the background with grass, waste covered with a synthetic intermediate cover system, and some waste covered with daily plastic cover and earth.



Figure 9. Stormwater is diverted onto perimeter road on the left of the picture. Lined leachate pond is on the right of the picture. Stormwater and leachate are pumped into municipal wastewater collection system at this time.



Figure 10. One of the historic leachate seeps appeared to have reemerged. This seep is in the northwest of the facility.



Figure 11. Leachate seeps from the active area of the facility flowing directly into the stormwater system.



Figure 12. Apparent leachate seeps flowing directly into the stormwater system over intermediately closed waste.



Figure 13. Perimeter bear fencing appears to be holding up well. Gaps beneath the fence are monitored and addressed as needed.



Figure 14. Well covered and compacted waste near the active face of the landfill.

**Class I / II MSWLF
Inspection Form 2025**



Alaska Department of
Environmental Conservation
Solid Waste Program

Landfill: Capitol Disposal Landfill
Date of Inspection: 5/14/2026
ADEC Inspector: Zach Gianotti
Participants: Olivia Lihou
Neil Lehner
Lynn Nobles WM
Michael WM

Weather Conditions:

45 degrees, scattered
showers and wind

Past Month Rainfall:

2.6 Inches

SCORING

Total Awarded Points: 239
Total Possible Points: 300
Final Score: 79.7%

ADEC Signature:

A handwritten signature in blue ink, appearing to read "Zach Gianotti", written over a horizontal line.

Printed Name: Zach Gianotti

Title: EPS 4

Class I / II MSWLF Inspection Form



Alaska Department of Environmental Conservation Solid Waste Program

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	PERMIT AND OPERATING PLAN – Review permit and operating plan to familiarize yourself with the requirements and approved operations for this landfill. Does the facility have a current ADEC permit? ☒ Yes ☐ No Permit Number <u>SW1A004-25</u> Expiration Date <u>12/17/2025 Admin. Continuance</u>
2	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. Check if the landfill is located in or near wetlands, on permafrost, in a 100-year floodplain, within 5,000 feet of any airport, within 10,000 feet of an airport used by jet aircraft, and/or are there any drinking water wells within 500 feet of the landfill property boundary. If the site has an RD&D Permit, review the RD&D permit. Review current/up-to-date site map
3	PREVIOUS INSPECTIONS – Review previous inspection forms. List any issues that may still be outstanding that should be investigated. <u>Stormwater management</u> <u>Wildlife activity</u> <u>Litter and cover concerns</u>
4	COMPLAINTS – If ADEC has received any complaints regarding the facility, list and describe them below: <u>A complaint about stormwater/leachate management at this site was received.</u>
5	AUTHORIZED WASTE TYPES – <i>The landfill is required to have a permit that authorizes all types of waste disposed of at the site.</i> Check the types of waste that the facility is authorized to dispose of: ☒ Municipal Solid Waste ☐ Regulated Asbestos-Containing Material (RACM) ☒ C&D or other Inert Waste ☒ non-RACM ☐ Sewage Solids ☒ Other: <u>Treated medical waste</u>

Class I / II MSWLF Inspection Form



Alaska Department of Environmental Conservation Solid Waste Program

#	Part One: ADEC Information Gathering																														
6	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 ADEC. <table border="1"> <thead> <tr> <th>☒ Type</th><th>Frequency</th><th>ADEC Report</th> <th>☒ Type</th><th>Frequency</th><th>ADEC Report</th> </tr> </thead> <tbody> <tr> <td>☒ Groundwater</td><td>Semi-annually</td><td>☒</td> <td>☐ Thermal</td><td></td><td>☐</td> </tr> <tr> <td>☒ Surface Water</td><td>Semi-annually</td><td>☒</td> <td>☐ Slope Stability</td><td></td><td>☐</td> </tr> <tr> <td>☒ Gas</td><td>Quarterly</td><td>☒</td> <td>☐ Piezometer</td><td></td><td>☐</td> </tr> <tr> <td>☒ Other</td><td>Other</td><td>☐</td> <td>☐ Other</td><td></td><td>☐</td> </tr> </tbody> </table> Take a map showing the monitoring locations at the site to assist you in the field inspection.	☒ Type	Frequency	ADEC Report	☒ Type	Frequency	ADEC Report	☒ Groundwater	Semi-annually	☒	☐ Thermal		☐	☒ Surface Water	Semi-annually	☒	☐ Slope Stability		☐	☒ Gas	Quarterly	☒	☐ Piezometer		☐	☒ Other	Other	☐	☐ Other		☐
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☒ Other	Other	☐	☐ Other		☐																										
7	WAIVERS – The landfill may obtain waivers for requirements related to development or operation. List any ADEC-approved waivers. _____ _____																														
8	ADDITIONAL PERMIT REQUIREMENTS List any Specific Conditions in the permit that are not addressed in the inspection checklist in Part Nine of this form.																														
9	FINANCIAL ASSURANCE – The landfill must demonstrate financial assurance to cover closure and post closure costs. 18 AAC 60.235, 18 AAC 60.265 The landfill must submit this information with their permit application, and then make appropriate updates to their operating record. They are not required to submit the updates to ADEC. Review the financial assurance What mechanism is used to demonstrate financial assurance? <u>Surety Bond</u> What is the date of the last update in the ADEC file? <u>1/6/2026</u>																														

Class I / II MSWLF Inspection Form



Alaska Department of Environmental Conservation Solid Waste Program

Part Two: Landfill Records

This section, and all remaining sections, should be completed at the landfill facility during the site visit.

#	Part Two: Landfill Records	POINTS	
		Score	Possible
1	PERMIT AND PERMIT APPLICATION – A copy of the permit application and current permit must be kept in the operating record. 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 60.235, 18 AAC 60.210 Is a copy of the current permit in the operating record? ☒ Yes ☐ No Is a copy of the permit application in the operating record? ☒ Yes ☐ No Is a copy of the latest permit application available and used by landfill staff? ☒ Yes ☐ No Comments: Files are kept on Teams and there is a paper copy on site.	10	10
2	WASTE QUANTITY TRACKING – The facility must maintain records of amount of waste received. 18 AAC 60.210 How is waste tracked? ☒ Weight ☐ Volume Do records appear to be accurate and complete? ☒ Yes ☐ No Is all waste that is accepted for disposal tracked and logged? ☒ Yes ☐ No Record or attach previous year's total(s): Dates: 1/1/2025-12/31/2025 Total Amount: 26,522 Tons MSW Total: 22,266 Tons Inert Total: 4,190 Tons RACM Total: 0 Special Waste Total: 66 Tons Comments: 965 tons of diverted waste, AK Waste curbside, metal, and appliances. 938 tons of recycling divered with CBJ Recycleworks.	5	5
3	TRAINING – Landfill staff must receive training to recognize regulated hazardous waste and PCB waste. Class I landfills must employ at least one operator or manager who has at least 2 years of experience in landfill operations and who holds a current MOLO certification. Records of training must be kept in the operating record. 18 AAC 60.235, 18 AAC 60.240, 18 AAC 60.335 Does the landfill record show that operators have received annual training to recognize regulated hazardous waste and PCB waste in the past year (Hazwoper, internal trainings, MOLO, etc.)? ☒ Yes ☐ No For Class I landfills, does the landfill have a record showing that at least one operator or manager has current MOLO certification? ☒ Yes ☐ No Comments: Jason Meadows has a MOLO certificate dated November 2025. Weekly and monthly safety meetings cover a variety of topics.	5	5

Class I / II MSWLF Inspection Form



Alaska Department of Environmental Conservation Solid Waste Program

#	Part Two: Landfill Records	POINTS	
		Score	Possible
4	RANDOM INSPECTION RECORDS – <i>The landfill must perform random inspections of incoming waste loads to identify any regulated hazardous waste or PCB waste. Records of the inspections must be available for review. 18 AAC 60.235, 18 AAC 60.240</i> Do the landfill operators perform random waste inspections? ☒ Yes ☐ No How often are random waste inspections performed and recorded? <u>Two a day, minimum</u> What loads are random inspections performed on? ☐ Residential ☐ Commercial ☒ Both <i>Comments: Scalehouse attendant performs the random waste inspections. These inspections ensure that any loads that contain profiled waste have accurate records. Loads that do not contain profiled waste are screened for regulated wastes.</i>	5	5
5	ASBESTOS RECORDS – <i>The landfill must maintain (1) at least two years of asbestos shipment records that, for each load of RACM, includes contact information for the generator and transporter, the amount (cy), and the date of receipt, and (2) an up-to-date map or site plan showing the boundaries of the asbestos cell including depth and the total volume. 18 AAC 60.450</i> Does the landfill maintain complete asbestos shipment records for the previous 2 years for each load of RACM received? ☒ Yes ☐ No Does the operating record contain an adequate, up-to-date map of the asbestos cell? ☐ Yes ☒ No Does the operating record contain up-to-date information about the depth and total volume of RACM in the asbestos cell? ☐ Yes ☐ No <i>Comments: There is no mapping of where asbestos has been placed at this site. Asbestos records are well maintained both digitally and with physical copies kept by the scalehouse attendant.</i>	8	10
7	VISUAL MONITORING – <i>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</i> Is visual monitoring performed monthly and recorded on the approved form? ☒ Yes ☐ No Does the operating record contain all monthly visual monitoring reports for the last 5 years? ☒ Yes ☐ No If not, have points already been deducted in previous ☐ Yes ☐ No <i>Comments: Visual monitoring occurs either weekly or daily depending on who is the acting manager. Monitoring is recorded in a binder. There is a specific leachate pond form as surface management of leachate is underway.</i>	5	5

Class I / II MSWLF Inspection Form



Alaska Department of Environmental Conservation Solid Waste Program

#	Part Two: Landfill Records	POINTS																
		Score	Possible															
8	COST ESTIMATES – The landfill must update closure and post closure cost estimates annually to adjust for inflation. Documentation must be kept in the operating record. 18 AAC 60.235, 18 AAC 60.265 Does the operating record contain appropriate and up-to-date (i.e. annual) closure and post-closure cost estimates? ☒ Yes ☐ No What is the date of the most recent update to closure costs? <u>11/13/2025</u> Comments: <u>Closure costs for this facility were updated in 2025 with permit renewal materials.</u>	5	5															
9	FINANCIAL ASSURANCE – The landfill must demonstrate financial assurance to cover closure and post closure costs. Documentation must be kept in the operating record. The local government financial test is the most common mechanism, and requires an annual update. 18 AAC 60.235, 18 AAC 60.265 What mechanism does the landfill use to demonstrate financial assurance? ☐ Local Government Test ☒ Other: <u>Surety bond</u> If the Local Government Test is used, the following items must be updated annually: <table border="1"> <tr> <td>☐</td> <td>A statement by the CFO that the government meets the 5 conditions of the local government test.</td> </tr> <tr> <td>☐</td> <td>The independently audited year-end financial statements for the latest fiscal year</td> </tr> <tr> <td>☐</td> <td>A report to the local government from the local government's independent certified public accountant (CPA) or the appropriate State agency stating the procedures performed and the CPA or State agency's findings</td> </tr> <tr> <td>☐</td> <td>A copy of the comprehensive annual financial report (CAFR) or certification that the requirements of General Accounting Standards Board Statement 18 have been met</td> </tr> </table> What is the date of the most recent update to FA in the file? <u>1/6/2026</u> Comments: <u>Policy amount for closure is \$5,141,361 and for post closure is \$2,423,501, coverage period of 1/13/2026 - 1/13/2027.</u>	☐	A statement by the CFO that the government meets the 5 conditions of the local government test.	☐	The independently audited year-end financial statements for the latest fiscal year	☐	A report to the local government from the local government's independent certified public accountant (CPA) or the appropriate State agency stating the procedures performed and the CPA or State agency's findings	☐	A copy of the comprehensive annual financial report (CAFR) or certification that the requirements of General Accounting Standards Board Statement 18 have been met	5	5							
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☐	A copy of the comprehensive annual financial report (CAFR) or certification that the requirements of General Accounting Standards Board Statement 18 have been met																	
10	OTHER OPERATING RECORD ITEMS – 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 Check each of the required items in the operating record: <table border="1"> <thead> <tr> <th>Req'd</th> <th>In Rcd</th> <th>Item</th> </tr> </thead> <tbody> <tr> <td>☒</td> <td>☒</td> <td>ADEC Inspection Reports</td> </tr> <tr> <td>☒</td> <td>☒</td> <td>As-built (Record) Drawings</td> </tr> <tr> <td>☒</td> <td>☒</td> <td>APDES Permit</td> </tr> <tr> <td>☒</td> <td>☒</td> <td>Other: USDA Wildlife Permit</td> </tr> </tbody> </table> Comments: <u>All files are digital</u>	Req'd	In Rcd	Item	☒	☒	ADEC Inspection Reports	☒	☒	As-built (Record) Drawings	☒	☒	APDES Permit	☒	☒	Other: USDA Wildlife Permit	5	5
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Class I / II MSWLF Inspection Form



Alaska Department of Environmental Conservation Solid Waste Program

Part Three: Landfill Development and Access

#	Part Three: Landfill Development and Access	POINTS	
		Score	Possible
1	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. 18 AAC 60.210, permit</i> Is the facility following the site and development plans? ☒ Yes ☐ No If no, are the changes minor, and do they maintain the integrity of the operations? ☐ Yes ☐ No Is the waste disposal area at least 50 feet from the property boundary? ☒ Yes ☐ No Has development of the landfill or surrounding area maintained the proper separation zone of 500 feet between the waste boundary and a drinking water well? ☒ Yes ☐ No <i>Comments:</i> ADEC was requested to approve a new development in the southern area of this facility that will result in less storage area for stormwater management. Approval was given as WM has provided evidence that the proposed developments will be adequate for the management of stormwater. This site has had a long history of having to adapt and respond to surface management of leachate, needing to reappropriate stormwater infrastructure for leachate management. The current stormwater infrastructure is inadequate to manage surface leachate. We will continue to monitor the development of this site.	7	10
3	ACCESS – <i>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</i> Is access to and within the facility limited? ☒ Yes ☐ No Is there any evidence of unauthorized access or dumping? ☐ Yes ☒ No <i>Comments:</i> The facility is fully fenced as of the inspection. Electrification of the fence has been installed on about 3/4 of the perimeter. This has limited bear access to the waste. There is a plan to remove and replace two segments of this fence this summer. There might be a period of heightened bear activity while the facility has more open access points. This period should end by mid September, 2026 when the construction of the perimeter fence is planned to be completed. Continued wildlife abatement will be important during this time.	9	10
4	SIGNAGE – <i>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</i> Are signs prohibiting hazardous, PCB, and other required waste posted and clearly legible? ☒ Yes ☐ No If additional signage is required, is it posted and clearly legible? ☒ Yes ☐ No <i>Comments:</i> _____	5	5

Class I / II MSWLF Inspection Form



Alaska Department of Environmental Conservation Solid Waste Program

Part Four: Landfill Operations

#	Part Four: Landfill Operations	POINTS	
		Score	Possible
1	AUTHORIZED WASTE TYPES – <i>The landfill is required to have a permit that authorizes all types of waste disposed of at the site. 18 AAC 60.200</i> Are all wastes apparent or reported to be accepted at the facility for disposal allowed under the permit? (See answers in Part One, Question 5) ☒ Yes ☐ No <i>Comments: All non-MSW is profiled online. Submitted profiles are reviewed by dedicated WAMs. They ensure that the waste being accepted is aligned with ADEC regulation, permit conditions, and permit application materials. This is confirmed by salehouse attendants.</i>	10	10
2	COVER - <i>Waste must be covered by 6 inches of soil or an approved alternative cover at the end of each day or more frequently to control disease vectors, fire, odor, blowing litter, and scavenging. In a Balefill, the vertical face may remain uncovered unless it is inactive for 7 or more days, exceeds 200 feet, or is causing animal attraction problems. 18 AAC 60.340</i> Does the cover appear to be at least 6 inches thick and sufficient to reduce litter and animal attraction? ☐ Yes ☐ No If Alternate Cover is being used, is it being used according to the approved plan? ☒ Yes ☐ No Is daily cover applied during the winter? ☒ Yes ☐ No Have any cover-related complaints (i.e. litter, smell, exposed waste, etc.) been received? ☐ Yes ☒ No If yes, have the landfill operators modified their cover operations to address the complaints? ☐ Yes ☐ No <i>Comments: Tarps are used as alternative cover as well as soil. Cover appears to be applied as needed and minimizing windblow litter. Wildlife transported litter is still a major issue at this site. As of 7/29 a 75 foot wide Tarpomatic is being shipped to the facility for use to limit soil. On 8/25 bears were active at uncovered face before working hours.</i>	10	20
3	BURNING – <i>Burning areas, if allowed, must be contained and controlled and only burn brush overburden and clean untreated wood. Open burning of municipal waste is not allowed at landfills. 18 AAC 60.355</i> Is the landfill approved to burn brush, overburden, or clean wood? ☐ Yes ☐ No If yes, is burning limited to the approved materials? ☐ Yes ☐ No <i>Comments: Burning is not allowed at the landfill. No evidence of burns.</i>	NA	5
4	LANDFILL FIRES – <i>Landfill fires have been occurring with increasing frequency, and can be identified by smoke, or evidence of unusual heat at the surface. The owner or operator of a landfill who accepts combustible waste shall maintain fire control equipment and make it available to extinguish any fires that start.</i> Does the landfill have appropriate fire suppression equipment onsite (large extinguishers, water source, fine grain cover material)? ☒ Yes ☐ No Has the landfill operated without evidence of a fire since the previous inspection? ☐ Yes ☐ No If a fire was identified, did the landfill respond appropriately to extinguish the fire? ☐ Yes ☐ No <i>Comments: No knowledge of fires at this site from staff present during</i>	5	5

Class I / II MSWLF Inspection Form



Alaska Department of Environmental Conservation Solid Waste Program

#	Part Four: Landfill Operations	POINTS	
		Score	Possible
5	LITTER - Litter must be controlled so that it does not become a nuisance or hazard. 18 AAC 60.233 Is the landfill maintained with minimal litter within the landfill boundary? ☒ Yes ☐ No Is the landfill maintained so no litter is evident outside the landfill boundary? ☐ Yes ☒ No Are conditions maintained to keep litter to a minimum? ☐ Yes ☐ No What measures are used to control litter at the landfill? ☒ Fencing ☐ Berms ☒ Collection ☐ Other _____ <i>Comments:</i> There are seasonal litter pick up operations from landfill staff. WM also provides support for cleanup efforts of neighboring Southeast Alaska Land Trust property where bird transported litter ends up. There was a concerning amount of litter along the base of trees along the property boundary uncovered during the inspection. The late snow melt made cleanup of winter litter hard. ADEC understands that WM intends to pick up this litter shortly. Area of concern appeared to be addressed by 7/29 site visit. Prompt litter pickup is needed in the future.	5	10
6	DUST, ODOR, NOISE, ETC. - 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 Are dust, odor, noise, traffic or other effects controlled so they do not cause a nuisance to neighboring homes or businesses? ☐ Yes ☒ No <i>Comments:</i> There is an ongoing Notice of Violation being processed in regards to leachate management at this site and potential adverse effects beyond the property boundary of the landfill. ADEC will follow up	2	5
7	SALVAGING - 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 Is public salvaging restricted to a controlled area away from the working face? ☐ Yes ☐ No Is the salvage area well managed with respect to safety and pollution control? ☐ Yes ☐ No <i>Comments:</i> Salvaging is not allowed at this site.	NA	5
8	DISEASE VECTORS AND ANIMALS - 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 Do observations confirm that no animals (fox, bear, domestic pets, etc.) have been scavenging in the waste (footprints, digging, etc.)? ☐ Yes ☒ No Is the site maintained with a limited number of birds present near the waste? ☐ Yes ☒ No	5	10

Class I / II MSWLF Inspection Form



Alaska Department of Environmental Conservation Solid Waste Program

Is the site maintained such that no harm to wildlife has been reported, ☐ Yes ☒ No
and no conditions exist that are likely to harm wildlife?

Comments: Electric fence was installed in July 2025. It appears to have had an immediate effect at reducing the number of bears trying to access the facility. Staff have noted that the gate is the main weak point when the facility is fully fenced. Preventing bear access to the facility at the gate is being explored. Construction this summer has taken down a portion of the fence. It appears there is concerning bear activity at this facility after business hours. USDA WS will continue to be present on site to mitigate bear issues.

Class I / II MSWLF Inspection Form



Alaska Department of Environmental Conservation Solid Waste Program

#	Part Four: Landfill Operations	POINTS	
		Score	Possible
9	INACTIVE AREAS – Areas that have not received or will not receive waste for more than 90 days, but have not yet reached the final capacity or elevation, must receive an intermediate cover within 7 days of the last waste placement. The area must be covered with 12 inches of soil and graded to prevent ponding and erosion. 18 AAC 60.243 Have inactive areas been appropriately covered and graded? ☐ Yes ☐ No Comments: Historic seeps in inactive areas of the landfill seem to be active again. A plan was mentioned during the 2025 inspection to install leachate sumps every 200 feet in the historic waste areas to prevent seep formation has not been put into action. One seep was addressed after the inspection as noted during site visit on 7/29.	4	10
10	WORKING FACE – Working face should be clearly identified and in compliance with the size limitations in the permit or kept as small as practical. Does the size of the working face meet the permit requirement? ☐ Yes ☐ No If there is no requirement, is the working face reasonably sized so issues such as litter, odor, and nuisance is controlled? ☒ Yes ☐ No Comments: The workingface was notably smaller than it has been in the past. Birds still have access to waste.	9	10
11	STABILITY – The landfill should be graded and shaped to preserve the integrity of the landfill. 18 AAC 60.410 Do the landfill slopes appear to be maintained so they are stable? (look for cracks, sloughing of soil or waste or liner slippage) ☒ Yes ☐ No Are the slopes maintained so no erosion is evident? ☒ Yes ☐ No Are the slopes maintained according to the design parameters? ☒ Yes ☐ No Is the slope stability monitoring plan being followed? ☐ Yes ☐ No Are the slope stability markers well maintained and easily identifiable? ☐ Yes ☐ No Comments: No stability concerns were noted, development of this site includes stability studies.	10	10
12	MAINTENANCE AND REPAIR - 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, buildings, other on-site structures, fence, and other components. 18 AAC 60.815 Is the facility maintained with no signs of damage to any component? (excluding monitoring devices - see Part 8) ☐ Yes ☒ No If the liner is visible, is it properly maintained with no signs of tears, leachate escaping, or other damage? ☐ Yes ☐ No	6	10

Class I / II MSWLF Inspection Form



Alaska Department of Environmental Conservation Solid Waste Program

	<i>Comments:</i> There are plans to upgrade the AELP fence and fill the low area near the SECON pond and reduce the size of the stormwater pond. These developments are expected to be completed by Mid September, 2026. There are talks about replacing the old maintenance building and replacing the scale at this facility, there are no concrete timelines for this. However as of the inspection date, the leachate containment structure is in poor condition.		
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Class I / II MSWLF Inspection Form



Alaska Department of Environmental Conservation Solid Waste Program

Part Five: Special Waste

#	Part Five: Special Waste	POINTS	
		Score	Possible
1	C&D DEBRIS- Prior to the start, all demolition operations must comply with 29 CFR 1926.850, which requires that an engineering survey of the structure must be completed by a competent person. This survey will provide the condition of the site and if any type of hazardous material or similarly dangerous substances have been used or stored on the site. This engineering survey should be provided to the operator and kept with the C&D acceptance form for that project. What is the process for accepting C&D? <u>All C&D is profiled by WAMs through WM system.</u> How is C&D identified when brought to the landfill? <u>C&D is accompanied by a waste profile and approval in order to be accepted at this facility. Scalehouse attendant reviews forms.</u> Is the C&D tested for pollutants with the appropriate testing methods? ☒ Yes ☐ No Are the results equal to or below regulatory standards? ☒ Yes ☐ No Comments: <u>Lead, asbestos, and PCBs are screened.</u>	10	10
2	Polluted Soil- Polluted soil may be disposed of only in a Class I MSWLF or a landfill that meets all applicable requirements for the disposal of industrial solid waste or for drilling waste. Disposal of polluted soil at a landfill other than a Class I MSWLF, an industrial solid waste landfill, a drilling waste landfill, or a Class III MSWLF, or the beneficial use of polluted soil in a Class III, will be approved on a case-by-case basis. This requires the owner of the polluted soil and the owner or operator of the landfill to submit a successful demonstration that is approved by the Department, in addition to obtaining approval from the owner or operator of the landfill. 18 AAC 60.025 What is the process for accepting polluted soil? <u>Polluted soil is accepted from a waste treatment facility in town, Bicknell. All treated soil is screened according to a ADEC Contaminated Sites permit with approval from ADEC SWP.</u> How is polluted soil identified and handled when brought to the landfill? <u>Polluted soil is typically used as cover material.</u> Is the facility permitted to accept polluted soil? ☒ Yes ☐ No Is the soil tested for pollutants with the appropriate testing methods? ☒ Yes ☐ No Are the results equal to or below regulatory standards or permit conditions? ☒ Yes ☐ No Comments: _____	10	10

Class I / II MSWLF Inspection Form



Alaska Department of Environmental Conservation Solid Waste Program

#	Part Five: Special Waste	POINTS	
		Score	Possible
3	RACM - If the facility accepts RACM (friable), it must be disposed of in a separate cell with restricted access and no visible emissions. RACM loads must be inspected to ensure that RACM is sealed in leak-proof containers, and deposited in the asbestos cell without damaging the containers. RACM must be covered by the end of the day with 6 inches of soil. 40 CFR 61.154, 18 AAC 60.450 How is RACM identified when delivered to the landfill? How does the landfill ensure that other C&D loads do not contain RACM? (signed statement, building surveys, etc.) Is RACM disposed of in a separate cell? ☐ Yes ☐ No Is the waste managed so no exposed or broken bags are evident? ☐ Yes ☐ No Is the waste managed so no visible emissions (dust) from the waste are evident? ☐ Yes ☐ No Have 6 inches of cover been applied to the waste? ☐ Yes ☐ No Is the waste managed without compacting the material? ☐ Yes ☐ No Is public access to the cell clearly prevented? ☐ Yes ☐ No Comments: RACM is not accepted at this landfill.	NA	10
4	NON-RACM HANDLING - Non-RACM (non-friable) 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 How is non-RACM identified when delivered to the landfill? All non-MSW is profiled and reviewed by WM WAMs before it arrives at the landfill. The waste profiles designate the waste as non-RACM. How does the landfill ensure that other C&D loads do not contain non-RACM? (signed statement, building surveys, etc.) An asbestos survey is performed and submitted as part of the waste profile. Where is non-RACM disposed of? ☐ RACM Cell ☐ C&D Cell ☒ Other MSW How is non-RACM handled so that it does not become friable? A site is prepped at 7 am along the leading edge of the active face. By 9 am the waste is placed and not compacted. Cover and waste is placed over the material. This disposal location becomes the leading edge of the active face. Is non-RACM covered (but not compacted prior to cover) within 24 hours of placement? ☒ Yes ☐ No Comments:	10	10
5	MEDICAL WASTE - Medical waste may not be disposed of at the landfill unless it has been treated by an approved process. Acceptable treatment options are: autoclave, medical waste incinerator, or other approved decontamination process. 18 AAC 60.030 Is treated medical waste accepted at the landfill? ☒ Yes ☐ No If so, how does the landfill verify the efficacy of the treatment? Medical waste is profiled. Records are kept on file. Visual confirmation of treatment is conducted. Comments:	5	5

Class I / II MSWLF Inspection Form



Alaska Department of Environmental Conservation Solid Waste Program

#	Part Five: Special Waste	POINTS	
		Score	Possible
6	SEWAGE SOLIDS - <i>If sewage solids are disposed of at the landfill, they may not be a regulated hazardous waste or PCB waste; they may not contain free liquids (paint filter test); and disposal must meet vector reduction requirements (may be done with daily cover). 18 AAC 60.365</i> How does the landfill determine that the sewage solids will pass the Paint Filter Test? _____ How does the landfill confirm that sewage solids are not a regulated hazardous waste or contain more than the permit limit for PCBs? _____ Are sewage solids disposed of in accordance with the approved plan? ☐ Yes ☐ No Are sewage solids covered daily? ☐ Yes ☐ No <i>Comments: Landfill no longer accepts sewage solids. Some vector tailings were disposed of at this facility this year. It was unclear to landfill staff if the vector tailings were from sewage system management. The tailings had to pass the Paint Filter Test. If unknown tailings are being sought to be disposed at this facility, consult ADEC for review.</i>	NA	5
7	LIQUID WASTE - <i>Liquid waste may not be disposed of at the landfill, with the exception of small quantities (one gallon or less) of containerized household waste. This prohibition includes leachate and baler squeezings, unless recirculation has been approved under an RD&D permit. 18 AAC 60.360</i> What procedures are used to keep prohibited liquids out of the landfill? <u>Waste is screened at the scales and at the active face. Most liquid wastes are directed to the household hazardous waste facility.</u> Do observation confirm that no liquids are disposed of in the landfill? ☐ Yes ☐ No <i>Comments: CBJ subsidizes the disposal of used cooking oil through HHW. Tanks are cut in half to ensure that no liquids are improperly disposed.</i>	5	5
8	VEHICLES - <i>Vehicles may not be disposed of 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> Are vehicles disposed of at the landfill? ☐ Yes ☐ No Are all fluids and batteries removed prior to disposal? ☐ Yes ☐ No How is this confirmed? _____ If vehicles are stored at the landfill, how do they ensure no fluids are released? _____ Are vehicles stored and/or disposed of in a stable manner that does not create a safety hazard? ☐ Yes ☐ No Are the vehicles or heavy equipment stored/disposed of so they do not create a visual nuisance? ☐ Yes ☐ No <i>Comments: No vehicles are disposed of at the landfill</i>	NA	10

Class I / II MSWLF Inspection Form



Alaska Department of Environmental Conservation Solid Waste Program

#	Part Five: Special Waste	POINTS	
		Score	Possible
9	WASTE STORAGE – <i>If the landfill collects and stores used oil, batteries, household hazardous waste, or other materials, they must be stored and managed to prevent release of fluids. 18 AAC 60.010(a)</i> What materials are collected and stored at the landfill site? ☐ Used Oil ☐ Batteries ☐ Paint ☐ Other _____ Are materials stored and managed in a manner that prevents the release of fluids, keeping the storage area free of leaks and drips? ☐ Yes ☐ No Are the stored materials covered and protected from the elements? ☐ Yes ☐ No Are the stored materials removed in a timely manner so that they do not accumulate? ☐ Yes ☐ No How often are the stored materials removed? _____ <i>Comments: Above wastes are sent to HHW, located on site but operated by Clean Harbors.</i>	NA	15
10	REMOVAL OF REFRIGERANTS – <i>The landfill must ensure that refrigerants from vehicles and appliances (refrigerators, freezers, air conditioners) and not vented to the environment. All refrigerant must be removed using certified equipment. 40 CFR 81</i> How does the landfill ensure that refrigerants are removed from vehicles or appliances prior to disposal or recycling? <u>Freon is not removed onsite. The applices are shipped to Seattle wher the freon is removed at the WM JMK Fibers Recycling Facility in Tacoma.</u> If refrigerants are removed at the landfill, is the removal equipment certified? ☐ Yes ☐ No If refrigerants are removed at the landfill, is the technician certified? ☐ Yes ☐ No <i>Comments: _____</i>	NA	10

Part Six: Surface Water Controls & Impacts			
#	Part Six: Surface Water Controls/Impacts	POINTS	
		Score	Possible
1	RUN-ON/RUN-OFF - <i>The landfill must have a control system to prevent run-on water from flowing in to the active cell. Run-off must also be controlled so that it does not impact nearby surface waters. 18 AAC 60.225, 18 AAC 60.815</i> Does the control system prevent run-on from flowing into the active ☐ Yes ☒ No Does the control system prevent run-off from the landfill from impacting nearby lands or waters? ☒ Yes ☐ No Are pipes, culverts, ditches, swales, berms, dikes, straw bales, erosion control matting, riprap, and other stormwater structures well ☐ Yes ☐ No Is the landfill graded appropriately to direct all water to the designated drainage point to prevent infiltration of water through areas where waste has been placed. ☒ Yes ☐ No <i>Comments: Major stormwater renovations are planned and underway during the inspection.</i>	8	10

Class I / II MSWLF Inspection Form



Alaska Department of Environmental Conservation Solid Waste Program

#	Part Six: Surface Water Controls/Impacts	POINTS	
		Score	Possible
2	SURFACE WATER AND PONDING - Waste may not be placed in surface water, including ponded rainwater. Landfill surfaces should be graded to prevent ponding, and all ponded water in contact with waste must be removed within 7 days. 18 AAC 60.225 How is waste managed so that no waste is in contact with surface water, including temporary ponding? Slopes of the landfill are kept steep. Soil and alt cover are used to contain waste. Has all ponding been removed if it has been more than 7 days since the ☐ Yes ☐ No last significant rainfall? Comments: <u>Some ponding on surface of the landfill during the inspection.</u>	8	10
3	LEACHATE SEEPS - Leachate seeps must be prevented, or contained and controlled at the boundary of the waste management area. 18 AAC 60.225 Is the site maintained with no visible evidence of leachate? ☐ Yes ☒ No If leachate is visible, is it contained within the landfill cell? ☒ Yes ☐ No What measures have been taken to contain and control any seeps? <u>Stormwater infrastructure is now leachate management infrastructure.</u> Comments: <u>System is being redeveloped to prevent the formation of leachate.</u>	6	10
4	LEACHATE COLLECTION SYSTEMS- Leachate collection systems (LCS) must be designed and constructed to maintain less than a 12-inch head of leachate on the liner. 18 AAC 60.330(b)(2) If leachate head is measured, do records indicate that the LCS maintains ☐ Yes ☐ No less than a 12-inch head of leachate on the liner? Do LCS systems and equipment appear in good condition and well ☐ Yes ☐ No maintained? Is the Leachate Collection System operated as designed to maintain less ☐ Yes ☐ No than 12" of head on the liner? Comments: <u>Stormwater infrastructure has been appropriated as leachate infrastructure.</u>	NA	5
5	LEACHATE TREATMENT/DISPOSAL- Leachate treatment and disposal methods should ensure no leachate causes a water quality violation of 18 AAC 70. 18 AAC 60.225 How is leachate treated and/or disposed of? <u>Leachate is directed to CBJ wastewater for treatment and discharge.</u> Do leachate treatment/disposal methods ensure no untreated leachate ☐ Yes ☐ No is released to the water or land? Do leachate treatment methods comply with ADEC-approved leachate ☒ Yes ☐ No management plans? Comments: <u>Some leachate over the past year was released from the site.</u>	5	10

Class I / II MSWLF Inspection Form



Alaska Department of Environmental Conservation Solid Waste Program

#	Part Six: Surface Water Controls/Impacts	POINTS	
		Score	Possible
7	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 60.470 Do the surrounding wetlands appear healthy, with no evidence of stress ☐ Yes ☐ No to plants, discolored water, or other evidence of wetland degradation? <i>Comments:</i> Wetlands have litter apart from that, they appear consistent with the surrounding area.	7	10

Part Seven: Monitoring Locations, Structures, & Plans			
#	Part Seven: Monitoring Locations, Structures, & Plans	POINTS	
		Score	Possible
1	GROUNDWATER MONITORING – Monitoring must be conducted at approved locations. Groundwater monitoring wells must be properly maintained. 18 AAC 60.820, 18 AAC 60.825, permit Are water monitoring locations clearly identified and marked? ☒ Yes ☐ No Are water monitoring sites/wells located according to the approved ☒ Yes ☐ No Are water monitoring wells in good condition and locked? ☒ Yes ☐ No Is the groundwater monitoring plan current? ☒ Yes ☐ No Does the facility submit the required monitoring reports on time to ☒ Yes ☐ No Are monitoring reports complete and contain required analyses? ☒ Yes ☐ No <i>Comments:</i>	10	10
2	SURFACE WATER MONITORING – Monitoring must be conducted at approved locations. Surface water monitoring sites must be properly maintained. 18 AAC 60.810, permit Are water monitoring locations clearly identified and marked? ☒ Yes ☐ No Are water monitoring sites/wells located according to the approved ☒ Yes ☐ No Are water monitoring wells in good condition and locked? ☒ Yes ☐ No Is the surface water monitoring plan current? ☒ Yes ☐ No Does the facility submit the required monitoring reports on time to ☒ Yes ☐ No Are monitoring reports complete and contain required analyses? ☒ Yes ☐ No <i>Comments:</i> With new surface water configuration, a new plan will be needed.	10	10
3	THERMISTOR MONITORING - If thermal monitoring is required it must be conducted at approved locations and in accordance with the thermal monitoring plan. 18 AAC 60.227, 18 AAC 60.228, 18 AAC 60.815, permit Are thermistors in good condition and locked? ☐ Yes ☐ No Are thermistors located according to the approved plan? ☐ Yes ☐ No Are thermistors monitored according to permit requirements? ☐ Yes ☐ No Is the thermal monitoring plan current? ☐ Yes ☐ No Does the facility submit the required monitoring reports on time to ☐ Yes ☐ No Does the monitoring show that waste is remaining frozen? ☐ Yes ☐ No If no, have they implemented an approved corrective action plan? ☐ Yes ☐ No <i>Comments:</i>	NA	10

Class I / II MSWLF Inspection Form



Alaska Department of Environmental Conservation Solid Waste Program

#	Part Seven: Monitoring Locations, Structures, & Plans	POINTS	
		Score	Possible
4	GAS MONITORING –Where explosive gas monitoring is required it must meet regulatory and permit requirements. 18 AAC 60.805, 18 AAC 60.470, Permit Is landfill gas monitored in the appropriate locations, and recorded as required? ☐ Yes ☐ No Are reports submitted to ADEC or filed at the landfill in accordance with the approved plan? ☒ Yes ☐ No If exceedances have been detected, were they properly reported? ☐ Yes ☐ No If gas monitoring structures are installed are they functional and well maintained? ☒ Yes ☐ No Are onsite buildings and structures adequately monitored for methane gas? ☒ Yes ☐ No Is the gas monitoring plan current? ☒ Yes ☐ No Are the gas monitoring structures installed in approved locations? ☐ Yes ☐ No Comments: No perimeter gas monitoring probes were noted during the inspection. <u>Correspondence to follow.</u>	5	10

Part Eight: Additional Permit Requirements			
ADDITIONAL PERMIT REQUIREMENTS- Address any additional permit requirements, listed in Part One, Question 8, which are not already included in the inspection form. Each requirement should be valued at 5, 10, or 20 points relative the potential health or environmental impact of non-compliance. Please add a row below, including possible points assigned, for each additional requirement.			
#	Part Eight: Additional Permit Requirements	POINTS	
		Score	Possible
1			
2			
3			
4			
5			

Part Nine: For Landfills with an RD&D Permit			
#	Part Ten: RD&D Permit Requirements	POINTS	
		Score	Possible
1	RD&D Permit Requirements – Require submission of progress reports every six months. 18 AAC 60.213, permit Are the progress reports submitted on time? ☐ Yes ☐ No Do the progress reports include all required elements? ☐ Yes ☐ No Are permit conditions/requirements being followed? ☐ Yes ☐ No Comments: _____	NA	10