

1410 N Hilton Street

Boise, ID 83706 • (208) 373-0502



Brad Little, Governor

Jess Byrne, Director

## DEQ POLICY STATEMENT PS25-02

### GROUNDWATER MONITORING FOR SMALL EXEMPT MUNICIPAL SOLID WASTE LANDFILLS

#### PURPOSE

This statewide policy for determining if monitoring of groundwater at small exempt municipal solid waste landfills (MSWLFs) is necessary to protect groundwater resources and source water supplies. This policy supersedes PS20-11.

#### SCOPE

This policy applies to all small exempt MSWLFs in Idaho. Small exempt MSWLFs are those that receive less than 20 tons of municipal solid waste daily, based on an annual average, with no evidence of groundwater contamination from the municipal solid waste landfill unit or expansion. The small exempt MSWLF must either serve a community that experiences an annual interruption of at least three consecutive months of surface transportation that prevents access to a regional waste management facility or must have no practicable waste management alternative and the landfill unit must be located in an area that annually receives less than or equal to 25 inches of precipitation.

#### STATEMENT OF POLICY

The Idaho Department of Environmental Quality (DEQ) is authorized to administer and enforce certain provisions of the Idaho Solid Waste Facilities Act pursuant to Idaho Code § 39-105(3)(g). The Idaho Solid Waste Facilities Act, Idaho Code § 39-7410 as amended in 1997, requires groundwater monitoring to be included within the design of all MSWLFs, except as follows:

- (a) When the MSWLF unit meets the conditions for exemption in 40 CFR 258.1(f) [the conditions for small exempt MSWLFs]; provided however, that the *director may*, at his discretion, *require monitoring* of a MSWLF unit which meets the conditions for exemption in 40 CFR 258.1(f), if necessary to protect ground water resources. If the director does require ground water monitoring of such MSWLF unit, a method other than the ground water monitoring wells required in this section and in 40 CFR 258.51 through 258.55 may be used to detect a release of contamination from the unit; or

(b)When suspended upon demonstration in accordance with 40 CFR 258.50 that there is no potential for migration of hazardous constituents from the MSWLF unit to the uppermost aquifer during the active life of the unit and the post-closure care periods when certified by a qualified professional and approved by the director. [emphasis added]

Idaho Code § 39-7410 allows for an exemption from groundwater monitoring for small exempt MSWLFs under certain conditions. However, some small exempt MSWLFs have been constructed and are accepting waste in locations that have a high probability of impacting groundwater from release of contaminants in leachate. Locations such as gravel pits and other porous geologic formations and shallow depth to fractured bedrock are locations where small exempt MSWLFs will be required to monitor groundwater. The policy section outlines the conditions that may require groundwater monitoring.

### **PROCESS FOR REQUIRING GROUNDWATER MONITORING AT SMALL EXEMPT MUNICIPAL LANDFILLS**

To comply with Idaho Code § 39-7410, DEQ must evaluate small exempt MSWLFs on a case-by-case basis to ensure that groundwater is protected. Each small exempt MSWLF must be evaluated for such characteristics as waste type, type of containment, depth to groundwater, geology, proximity of domestic wells, and history of MSWLF operating problems. These site-specific categories will be recorded on the Small Exempt Municipal Solid Waste Landfill Groundwater Evaluation Work Sheet (Appendix A). Small exempt MSWLFs scoring over 700 points and unable to comply with Idaho Code § 39-7410(1)(b) are required to monitor groundwater through use of monitoring wells. MSWLFs scoring between 500 and 700 points and unable to comply with Idaho Code § 39-7410(1)(b) may be required to assess groundwater by conducting groundwater monitoring through use of monitoring wells or implement other monitoring method(s) approved by the director, which will effectively determine if groundwater is impacted.

### **RESPONSIBILITY**

DEQ's solid waste program manager is responsible for maintaining this policy.

### **IMPLEMENTATION**

This policy is effective immediately and will remain in effect for 5 years unless amended, replaced, or rescinded prior to expiration.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 2025

\_\_\_\_\_  
 Jess Byrne  
 Director, Idaho Department of Environmental Quality

## Appendix A. State of Idaho Small Exempt Municipal Solid Waste Landfill Groundwater Evaluation Worksheet

This worksheet is to be used by DEQ staff to determine whether a small exempt municipal landfill should provide for groundwater monitoring.

Facility Name:	County:	Region:
Location:	Lat./Long.:	Date:
Contact Person:	Facility Size:	DEQ Staff:
Contact Address:	Date Opened:	Total Score:

**Instructions:**

1. Fill out the above site information and enter the score after computed.
2. Where information is not supplied or available to the reporter, assume the highest value assigned to that category.
3. Circle all applicable value(s) for each category, multiply by a factor if necessary, and place the total in the score column below. Add all the values in the score column and enter the total in the score box above. Take thorough notes and add comments about the site where appropriate.
4. Keep the original for your file and send a copy of the completed form and any attached notes to your regional administrator and to the solid waste program manager, DEQ State Office, 1410 N. Hilton St., Boise, ID, 83706.
5. If the small exempt MSWLF has the potential to affect a Sensitive Resource Aquifer, then groundwater monitoring is required.

A) Facility daily volume. Enter the estimated volume of waste received per day.

<u>Category</u>	<u>Points</u>	<u>Value</u>	<u>Score</u>
> 10 tons per day	30	_____	
< 10 tons per day	10	_____	_____

B) Waste type. With local health district assistance, estimate percent of known waste types. Also, enter 100 if you know or suspect that hazardous waste is present such as conditionally exempt small quantity generated (CESQG) hazardous waste. If subtitle C hazardous waste is present, the facility must be referred to the Hazardous Waste Program at the DEQ State Office.

<u>Category</u>	<u>Points</u>	<u>Value</u>	<u>Score</u>
Known/observed CESQG hazardous waste disposal	100	100	
Municipal solid waste	% × 40 =	_____	
Agriculture waste	% × 20 =	_____	
Petroleum contaminated soil	% × 20 =	_____	
Sewage sludge	% × 20 =	_____	
Paper mill ash	% × 20 =	_____	
Construction and demolition waste	% × 20 =	_____	
			_____

C) Waste containment. With local health district assistance, enter any that apply.

<u>Category</u>	<u>Points</u>	<u>Value</u>	<u>Score</u>
No synthetic liner	100	_____	
Waste exposed (closed portion)	75	_____	
Soil or clay cover (closed portion)	poor 50 good 0	_____ _____	
Vegetative cover (closed portion)	poor 50 good 0	_____ _____	
			_____

D) Depth to groundwater from bottom of landfill. Enter one.

<u>Category</u>	<u>Points</u>	<u>Value</u>	<u>Score</u>
0 feet to 5 feet	100	_____	
> 5 feet to 50 feet	75	_____	
> 50 feet to 100 feet	50	_____	
> 100 feet	25	_____	
			_____

E) Geology and hydrologic conductivity (K) above aquifer. Enter one.

<u>Category</u>	<u>Points</u>	<u>Value</u>	<u>Score</u>
Gravel, clean sand, fractured igneous or metamorphic rock, cavernous limestone or dolomite	100	_____	
Sands, sandy silts, high K till, moderate K limestone, dolomite, sandstone, fractured igneous or metamorphic rock	75	_____	
Silt, loess, or till, limestone, dolomite, sandstone, or fractured igneous or metamorphic rock with medium K	50	_____	
Clay, till, shale, unfractured igneous or metamorphic rock with low K	10	_____	
			_____

F) Domestic water wells potentially at risk (enter one).

<u>Category</u>	<u>Points</u>	<u>Value</u>	<u>Score</u>
Wells exist within 1,200 feet	100	_____	
Wells exist > 1,200 feet up to 2,500 feet	75	_____	
Wells exist > 2,500 feet up to 5,000 feet	50	_____	
Wells exist greater than 5,000 feet	25	_____	
			_____

G) History of Operating Problems. With local health district assistance, enter any that apply.

<u>Category</u>	<u>Points</u>	<u>Value</u>	<u>Score</u>
Waste has been placed below the high seasonal water level	100	_____	
Documented contamination of surface water	100	_____	
Stormwater run-on/run-off control problems	100	_____	
Repeated, uncorrected problems noted in past visits	50	_____	
Documented leachate seeps	50	_____	
			_____

H) Evidence of Contamination.

<u>Category</u>	<u>Points</u>	<u>Value</u>	<u>Score</u>
Lab documentation that groundwater has been impacted by leachate?	100	_____	
Are there site conditions present such as stressed vegetation that suggest it is likely groundwater has been impacted by leachate?	75	_____	
			_____

I) Any Other Characteristics (plus or minus value scores accordingly).

<u>Category</u>	<u>Points</u>	<u>Value</u>	<u>Score</u>
		_____	
		_____	
			_____

Add the scores for Categories A through I here and enter the total at the top of page 1.

Category	Score
A	
B	
C	
D	
E	
F	
G	
H	
I	

TOTAL SCORE OF ALL CATEGORIES \_\_\_\_\_