Discontinuing Monitoring at Closed Landfills WMM Study Group – Priority Topic Scope

Description of the Topic: Hundreds of Wisconsin landfills have been closed for years and have reached, or will soon reach the end of their long term care period. Monitoring results at some of these landfills may indicate stable or decreasing contaminant concentrations. Yet they continue to be monitored on a quarterly, semi-annual, or annual basis, creating an ongoing expense for the municipal or private owner that may not be contributing to the protection of the environment or public health. The scope of this topic is to explore the potential for discontinuation of monitoring at closed landfills that exhibit stable or decreasing contaminant concentrations.

The DNR guidance document "Reducing or Terminating Groundwater Monitoring at Solid Waste Landfills" (PUB-WA 1013, Rev 2014) provides guidance on reducing or terminating monitoring at landfills and is directly applicable to this topic (attached).

Potential Work Efforts/Solutions: Based on a discussion between Brad Wolbert, Joe Lourigan, Tom Karwoski and Erik Lietz, the following potential work efforts/solutions were identified:

- Create a subcommittee to further evaluate the topic and, if the problem is confirmed, propose potential solutions.
- Propose appropriate revisions to the existing DNR guidance, "Reducing or Terminating Groundwater Monitoring at Solid Waste Landfills." Revisions may include:
 - Allowing monitoring frequency reductions beyond annual sampling (i.e., 2 year or 5 year sampling frequencies) to reduce sampling costs. Decreased sampling frequencies may require annual inspection and reporting on well conditions in order to maintain the viability of the monitoring network between sampling events.
 - Clarifying the guidance on terminating monitoring by providing more detailed information on what conditions potentially qualify a landfill for the termination of monitoring. Also provide more detail on what information must be submitted to DNR for their review of the monitoring termination request.
- Evaluate national (e.g., the system developed by the Environmental Research and Education Foundation) and other States' guidance or policies for terminating of monitoring
- Provide suggestions for future code revisions.
- Discuss perceived Owner responsibilities with older, closed landfills and recommend to the DNR any needed educational materials or communications explaining long-term care accounts and timeframes versus code/statutory requirements to monitor closed landfills.

With input from a subcommittee, this topic may be one that can be addressed in a shorter period of time than some other topics currently being considered.

Potential Subgroup Members:

- Joe Lourigan
- Tom Karwoski
- Erik Lietz
- Interested stakeholders such as municipal and private landfill owners and public interest groups
- Other DNR hydrogeologists
- Other consultants involved in landfill monitoring
- Others with technical knowledge about environmental impacts from closed landfills

