



# BFI Missouri City Landfill

## Frequently Asked Questions

### **Why did BFI apply for a hazardous waste permit?**

BFI currently has a hazardous waste permit for the BFI Missouri City Landfill. The permit contains facility-specific requirements regarding long-term care for a closed hazardous waste landfill and investigating releases of hazardous waste and hazardous constituents to the environment. The permit was issued for a 10-year period, the maximum period currently allowed by state and federal laws and regulations. BFI submitted the permit application to renew the permit in order to continue long-term care and investigations at the site.

### **Can the permit not be issued at all?**

Certain “inactive” hazardous waste treatment, storage and disposal facilities are required to get a hazardous waste permit in order to investigate, monitor and clean up releases of hazardous waste and hazardous constituents to the environment at their facility. These are facilities that are now closed, but treated, stored or disposed hazardous waste under the under interim status portions of the federal hazardous waste laws, while they either applied for a hazardous waste permit or closed those operations. If a hazardous waste facility is seeking or is required by law to get a hazardous waste permit and the facility meets all the requirements set in the law and regulations, the department is required to issue the permit.

A hazardous waste permit is a legally enforceable regulatory instrument. The department can change requirements in the permit, based on technical or legal issues brought up by comments submitted during the public comment period. By issuing a permit, the department is given the authority, under state law and regulations, to enforce the permit requirements and make sure the facility is in compliance with the associated regulations. Without a permit or other similar enforceable regulatory instrument, the department’s ability to address the environmental issues and conditions at the facility would be greatly weakened.

### **How long will long-term monitoring and maintenance of the closed landfill be required?**

Based on what the department currently knows about the environmental conditions at the facility and the large amount of hazardous waste left in place, post-closure care (i.e., long-term monitoring and maintenance) is essentially expected to continue infinitely. The issue will be re-evaluated during future permit reissuances or if site conditions change.

### **How is BFI preventing wildlife from coming into contact with the hazardous waste and spreading it beyond the site?**

Wildlife should not be able to come in contact with the waste. The groundwater is about six feet below ground. The hazardous waste is encapsulated in the landfill under a three to four foot cap, made up of several layers of clay, plastic and geomembrane. Grass is grown on the cap to prevent the soil from eroding. Other corrective measures are in place to capture any seeps from the landfill.

### **What contaminants are BFI monitoring ?**

The contaminants listed in Table 1 of the permit represent the materials contained in the closed landfill and detected in related releases to groundwater. The main contaminants of concern are metals; volatile organic compounds (VOCs); semi-volatile organic compounds; organochlorine pesticides; organophosphorus pesticides; chlorinated herbicides; dioxin/furan compounds; 1,4-dioxane; cyanide and sulfide.



### **What regulatory standards are being used to compare the results of the groundwater sampling?**

The permit is designed to protect groundwater beyond the facility property boundaries to drinking water standards. On-property groundwater is compared to risk-based thresholds.

### **How does the department know the sampling results are accurate?**

The department periodically conducts an independent evaluation of BFI's monitoring and corrective action programs, where the geology, groundwater flow and analytical data are reviewed. Periodically the department collections and analyses a "split" sample from select groundwater monitoring wells and sends them to their own laboratory.

### **The Corrective Measures Study was completed in 1995. How does the department know these corrective measures are still working?**

Twice a year, BFI submits groundwater monitoring reports to the department. These reports contain information regarding maintenance of the monitoring system, wells, landfill, risk-calculations, analytical data trends and the actual groundwater and surface water monitoring results validated by a certified laboratory. The department reviews each report to determine if additional corrective measures are needed to address any issues. Increasing contaminant amounts in certain wells may lead to additional monitoring. If on-property risk levels are exceeded, it serves as a "trigger" for additional action(s).

Since the 1995 Corrective Measures Study, BFI has implemented several additional corrective measures at the site, including improving the groundwater interceptor trench and installing additional monitoring wells, a stream bank interceptor trench and additional sumps to capture impacted surface seeps, leachate and groundwater.

### **What would BFI be allowed to treat in the on-site treatment plant proposed in the Remedial Action Plan?**

BFI will only be allowed to treat leachate and groundwater collected on-site. They are not authorized to treat wastes from off-site.

### **What will happen to the waste after it is treated?**

The impacted groundwater and leachate will be treated using several treatment steps to remove the different contaminants. The treated waste will be rigorously tested to make sure it meets all applicable water quality standards listed in a separate permit. If the standards are not met, the waste will be retreated. When the standards are met, the treated water will be discharged to a permitted discharge location.

### **What if I have more questions about the facility after the public comment period is closed?**

If you need to know something about the facility, have a concern, or would like something explained to you, please contact the department any time, not just during designated public comment periods.