



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Environmental
Conservation

DIVISION OF ENVIRONMENTAL HEALTH
Solid Waste Program

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Sent via Email

October 10, 2023

John Witte
Director of Public Works
City of Valdez
P.O. Box 307
Valdez, Alaska 99686

Subject: 2023 Valdez Balefill and C&D Landfill Inspection Letter

Dear Mr. Witte:

On July 21, 2023, a representative of the Alaska Department of Environmental Conservation (ADEC) Solid Waste Program conducted an inspection of the City of Valdez (COV) Balefill and Construction and Demolition (C&D) Landfill. The Balefill and C&D Landfill are permitted under a Class II Comprehensive Solid Waste Disposal Permit number SW2CP014-27. The inspection was facilitated by Raymond Gross and John Witte. I appreciate the time each of you took to answer questions and show me around the facility. The completed inspection form attached to this letter provides more detailed documentation on the inspection. The facility received 354 points out of 360 possible points for an overall score of **98.3%**.

The Valdez landfills were well operated. The required paperwork was accessible and retrievable from the operating record. Landfill personnel demonstrated a good understanding of the operational requirements outlined in the ADEC permit. The baling facility was organized, clean, and structured to allow landfill personnel to inspect incoming wastes. COV has good control over waste material entering the landfill cells by having most customers drop off wastes at the baler building, and keeping entrance gates locked at the landfills. Signage at the access gates and throughout the landfills clearly indicated materials prohibited from the landfills and directions for proper disposal. Scrap metal was segregated from C&D waste and hauled off site which has reduced the volume of C&D material being landfilled. Working faces were well covered, and no litter and few birds were observed on the day of the inspection. Groundwater sampling and gas monitoring were conducted on a regular basis in compliance with permit requirements.

Inspection points were deducted for lack of reporting on the Posi-Shell pilot project, and for waste in ponded water near the working face of the Balefill. The COV had been issued a temporary conditional approval on January 11, 2023, to perform a pilot project to test the effectiveness of Posi-Shell as an alternative daily cover. A brief report was to be submitted to ADEC by July 11, 2023, providing some usage data and discussing the results of the pilot project. COV requested an extension for submitting the report as they had undergone changes in personnel which ADEC approved. Despite discussing the report requirement during the July 7, 2023, meeting between COV and ADEC, and during the 2023 inspection, ADEC has not yet received the report. The report is crucial for COV continuing to use Posi-Shell as alternative cover as ADEC needs to evaluate the effectiveness of the alternative cover and to determine whether to make the approval permanent. Five points were deducted because ADEC has requested the report multiple times. One point was deducted for some waste in pooled water near the working face of the Balefill. No waste should be in contact with surface water.

Overall, the Valdez Balefill and C&D landfill continue to be well-run facilities as demonstrated by the 98.3% inspection score on July 21, 2023. Please contact me at (907) 269-7626 or by email at annemieke.powers@alaska.gov with any questions or comments you may have.

Sincerely,

A handwritten signature in black ink that reads "S. Annemieke Powers".

Annemieke Powers
Environmental Protection Specialist III

Attachments