



# Disposal of Low-Level Petroleum Polluted Soil: Class III

## Guidance

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Alaska Department of Environmental Conservation  
Division of Environmental Health  
Solid Waste Program

Class III landfills serve the most remote communities in Alaska. They are unlined facilities with very limited capacity and generally no environmental monitoring except for visual monitoring. Class III landfills are unique in that disposal of low-level petroleum polluted soil is allowed but is primarily intended to facilitate the cleanup of small spills within the local community. Disposal of polluted soil in a Class III landfill must be carefully considered to weigh the relative risk and benefit to the community. As such, prior approval by the landfill permittee and the Alaska Department of Environmental Conservation (ADEC) Solid Waste Program under Title 18, Chapter 60, Section 025(b) [18 AAC 60.025(b)] is required.



**DO NOT** assume that landfill disposal is an option without first confirming that the polluted soil will be accepted at a permitted landfill, and **DO NOT** assume that the disposal will be free of charge.

### Disposal of Polluted Soil in a Permitted Class III Landfill Under 18 AAC 60.025(b)

The Solid Waste Program will approve disposal of polluted soil in the community's permitted Class III landfill if the following specific criteria are met:

- The polluted soil must originate from the cleanup of a single spill incident (not consolidated from multiple sites) within the community served by the Class III landfill.
- The volume of polluted soil is less than 500 cubic yards.
- The soil contains only petroleum hydrocarbons at concentrations that do not exceed the following maximum concentrations:
  - Gasoline-Range Organics (GRO) – 900 mg/kg
  - Diesel-Range Organics (DRO) – 2,000 mg/kg
  - Residual-Range Organics (RRO) – 4,500 mg/kg

A request for disposal must be signed by both the landfill permittee and the generator of the polluted soil, and must include the applicable laboratory data report(s). For convenience, the request can be made on the application form, "Disposal of Low-Level Petroleum Polluted Soil in a Class III Landfill," available at [www.dec.alaska.gov/eh/solid-waste/permitapps/](http://www.dec.alaska.gov/eh/solid-waste/permitapps/).

If the criteria for disposal under 18 AAC 60.025(b) cannot be met, the polluted soil may still be considered for beneficial use in a Class III landfill under 18 AAC 60.025(c). Please see the *Polluted Soil: Beneficial Use in Class III Landfills for guidance on this method*.

[www.dec.alaska.gov/eh/solid-waste/how-do-i-dispose-of/](http://www.dec.alaska.gov/eh/solid-waste/how-do-i-dispose-of/)

### **Polluted Soil Definition - 18 AAC 60.990 (103):**

- (A) *soil that is placed into a landfill, that is not a regulated hazardous waste, that was excavated during spill response or leaking underground storage tank action or to comply with an approved contaminated site cleanup plan under 18 AAC 75 or 18 AAC 78; or*
- (B) *a residue or other material that is placed into a landfill and that is not a regulated hazardous waste but contains a hazardous substance in a concentration exceeding the applicable soil cleanup levels set out in 18 AAC 75.341, Table B1 or Table B2*



## Sampling

If landfill disposal is proposed as an option for soil excavated from a contaminated site, the soil proposed for disposal must first be characterized with regard to the volume of soil, the contaminant concentrations in the soil, and any other data needed to support the request for disposal. Based on the history of the source area of the soil, the Solid Waste Program may require testing for contaminants other than petroleum hydrocarbons in order to confirm that the only contaminants are petroleum hydrocarbons.

The analytical methods used in characterizing the soil are critical in generating the data necessary to support disposal in a landfill, so it is necessary to develop a simple Sampling and Analysis Plan (SAP) that is specific to characterizing the waste for disposal. Please refer to the most recent ADEC *Field Sampling Guidance* available at [www.dec.alaska.gov/spar/csp/guidance-forms/](http://www.dec.alaska.gov/spar/csp/guidance-forms/) or contact your Solid Waste Program Rural Specialist ([www.dec.alaska.gov/eh/solid-waste/rural-contacts/](http://www.dec.alaska.gov/eh/solid-waste/rural-contacts/)) for guidance on proper field screening, sample collection, preservation, and analytical methods.

Sampling that occurs prior to approval of an SAP may be rejected. If that happens, resampling may be required. If the Solid Waste Program is contacted early enough in the cleanup process, the required sampling could be conducted at the close of the excavation effort. The results of the sampling will help inform choices concerning disposal. It is advisable to consult with the Solid Waste Program after the results are received to determine whether the results support moving forward with the low-level petroleum polluted soil request under 18 AAC 60.025(b).