



April 17, 2020

Subject: LANDFILL GROUNDWATER AND SURFACE WATER MONITORING DURING  
COVID-19

To whom it may concern,

The Alaska Department of Environmental Conservation (ADEC) Solid Waste Program recognizes the need for flexibility in landfill water monitoring programs during this period of uncertainty. ADEC's preference is that landfills complete their regularly scheduled monitoring events. However, due to the presence of COVID-19 in Alaska and the challenges it presents to staffing, shipping, laboratory analyses, and travel, ADEC will exercise leniency where possible.

Landfill personnel are currently facing challenges with shipping samples due to couriers reducing staff and the lack of local flights, and as a result, it is difficult for them to get their samples to laboratories within hold times. Once samples arrive at the laboratory, the reduced staffing poses another challenge to meeting hold times. If possible, landfill staff are encouraged to work with the laboratory to meet hold times and examine other laboratory options for analyses if necessary. It is important to ensure that the laboratory used is properly certified and can perform the analytical methods approved in the Quality Assurance Project Plan (QAPP) with appropriate detection limits. However, it may not be possible for landfill operators to modify their laboratory contracts at this time.

Other challenges affecting water monitoring are the travel restrictions and lack of flights across the state. Currently, under the Governor's Mandate 012 on Intrastate Travel, travel between communities is limited to critical infrastructure or critical personal needs. As a result, many samplers will not be able to travel to communities outside of their home community to perform sampling. This issue is further compounded by the cancellation of flights by local air carriers. Additionally, communities or businesses may further restrict access to attempt to limit the spread of COVID-19.

It is important to remember that although it's possible to shift the date of a sampling event to allow for sampling, the date should not be shifted more than 30 days from the normal sampling window. Data collected outside of the normal sampling window may skew any future statistical analyses. It is also important to remember that samples, both surface and groundwater, need to be collected by qualified samplers as outlined in the landfill's approved QAPP.

All of these factors lead to the need for flexibility from the Solid Waste Program. If a regularly scheduled monitoring event cannot be completed due to challenges associated with COVID-19, the

landfill operator should contact the landfill regulator as soon as possible to discuss options. Landfill operators can request an exemption for a specific monitoring event due to COVID-19 related changes. The written request should clearly outline and justify why the regularly-scheduled monitoring event cannot be completed. ADEC will evaluate the request and will respond with an approval or denial in writing. Please contact us:

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As the mitigation measures and situation continue to change almost daily, it is important to stay up to date on the challenges landfill operators are facing. As mitigation policies are relaxed or adjusted, water monitoring may become more feasible. As such, ADEC will continue to monitor the situation and update the policy for leniency accordingly.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bob Blankenburg". The signature is stylized and cursive.

Bob Blankenburg  
Solid Waste and Pesticides Program Manager