

# Solid Waste Landfill Post-Closure Care: NWRA/SWANA Technical Policy/Position Paper



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01/24/2019

The National Waste & Recycling Association and Solid Waste Association of North America (collectively “Associations”) have jointly issued two documents addressing closed Municipal Solid Waste (“MSW”) landfills and the issue of post-closure care (“PCC”).

The two documents are:

- *T-9.3 SWANA Technical Policy – Termination of Municipal Solid Waste Landfill Post-Closure Care Requirements*
- *Position Statement – Performance-Based Approaches to Evaluate Determination of Landfill Post-Closure Care Requirements*

The documents are described as recommending a major shift in the process states use to determine when closed MSW landfills are ready to end PCC.

Closure is a process during which a landfill (or a portion thereof) is no longer receiving waste and preparing for post-closure maintenance according to an approved plan/construction schedule. Once a site is closed, it ceases accepting waste. The closure will be undertaken in accordance with the applicable statutes and regulations. Closure and post-closure plans are intended to ensure that landfill closure and post-closure maintenance conform to state performance standards and minimum substantive requirements. They will constitute a prerequisite to a facility’s obtaining an operating permit.

The Associations note that the Resource Conservation and Recovery Act Subtitle D provisions established a post-closure period of 30 years. However, they further state that individual states are allowed to adjust the actual length of time as necessary to protect human health and the environment. They further state that:

The federal standard did not specify the data or methodology required to be used. The United States EPA addressed the similar lack of specificity regarding post-closure care for hazardous waste landfills in 2016.

Jeffrey S. Murray, SWANA International Board Past President, is quoted as saying:

We want to encourage our Association members to work with the state regulatory agencies to establish regional performance-based evaluation processes. . . holding owners and operators to the same science-based standard performance will instill more confidence in how potential risks have been mitigated through facility closure and lead to smoother transitions to custodial or long-term management and potential re-use.

As a result, the Associations are requesting that the length of required post-closure care be determined on a site-specific basis, rather than set by regulation at a single pre-determined number of years for all closed MSW landfills in all 50 states.

A copy of the news release with links to the Position Statement and Technical Policy can be found [here](#).