

Landfill Monitoring Under the Massachusetts Contingency Plan *What it Means to be Adequately Regulated*

*Presentation to
Massachusetts Health Officers Association
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MassDEP

Commonwealth of Massachusetts
Department of Environmental Protection

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Adequately Regulated

(MCP Subpart A, 310 CMR 40.0114)



What is the purpose of the adequately regulated provisions of the MCP?



What type of sites and/or response actions that may be considered adequately regulated?



What does it mean for a site to be adequately regulated?



Adequately Regulated Requirements for Solid Waste Management Facilities – 310 CMR 40.114



Notification Requirements
(310 CMR 40.0300)



2-Hour or 72-Hour releases under the MCP



Immediate Response Action Required
(310 CMR 40.0410)



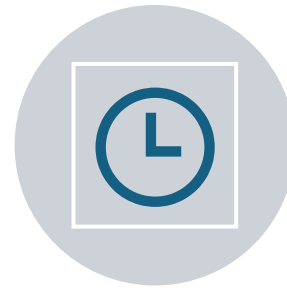
Yes! except for certain Conditions of SRM

<https://www.mass.gov/doc/adequately-regulated-fact-sheet/download>

Adequately Regulated Requirements for Solid Waste Management Facilities – 310 CMR 40.114



Risk Characterization
(310 CMR 40.0900)



Risk characterization requirements apply to boundaries outside boundary of landfill



Permanent or Temporary Solutions
(310 CMR 40.1000)



Requirements for Permanent or Temporary Solutions are not applicable.

<https://www.mass.gov/doc/adequately-regulated-fact-sheet/download>

Adequately Regulated Requirements for Solid Waste Management Facilities – 310 CMR 40.114



Public Involvement
(310 CMR 40.1400)



Applicable



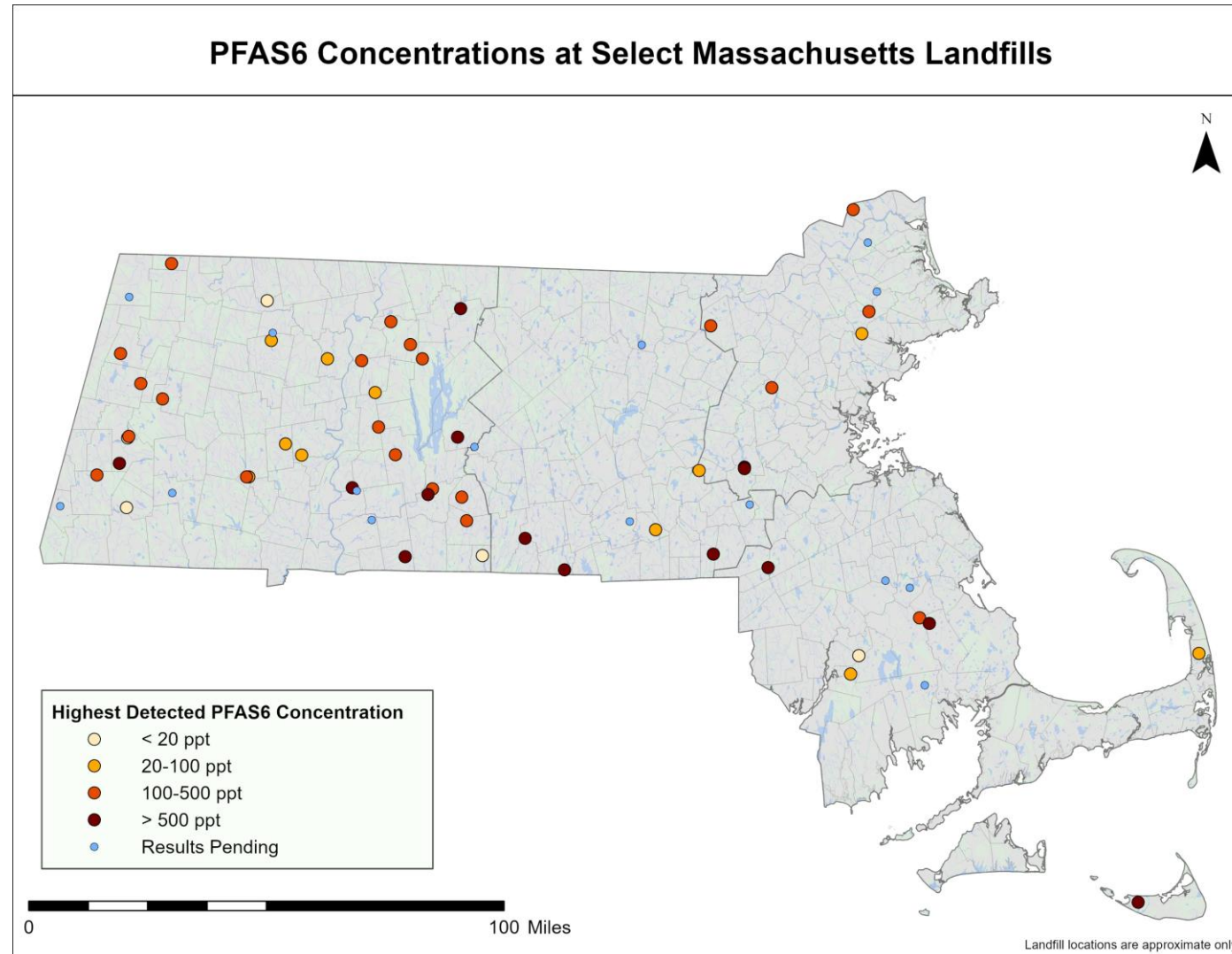
Licensed Site Professional
(310 CMR 40.0114(2))



Not required unless managing remediation waste.

<https://www.mass.gov/doc/adequately-regulated-fact-sheet/download>

Case Study – DSWM – PFAS Study



Case Study

Erving Landfill – Post Closure Monitoring

- October 2023 – MassDEP requires PFAS sampling as part of Landfill Post-Closure Monitoring
- April 15, 2024 - Town of Erving notifies MassDEP of a 72-hour notification for PFAS6 detected in three monitoring wells at the Erving Landfill exceeding 20 ng/l (ppt) and located within 500 feet of off-site private wells
- MassDEP assigns RTN 1-0050082 and issues Notice of Responsibility (NOR) to Town.
- NOR requires Town to submit Release Notification Form and Immediate Response Action Plan on or before June 14, 2024 (60 days from notification).



Case Study

Erving Landfill – Post Closure Monitoring

- MassDEP requires IRA Plan include:
 - Identification and sampling of all public and private wells with potential to be impacted
 - Bottled water followed by installation of POET system
 - Where POET systems are installed, provide an OMM schedule



Case Study

Erving Landfill – Post Closure Monitoring



Thank You Q & A

MassDEP

