

Wilson, Donna

From: Wilson, Donna
Sent: Monday, November 15, 2010 4:17 PM
To: 'David Garrett'
Cc: gehle, dennis; Herndon, Donald; Backus, Pat; Smith, Vernon
Subject: Material Recovery Landfill PTC application

David – I've reviewed the response to comments (Oct. 19) dated Oct 26 (multiple attachments) and Nov. 5 (revised financial assurance cost estimates for 92-24 and 92-34), and there are 2 remaining comments/issues remaining for the PTC Phase 2 application:

1. The capacity and volume numbers from the July 2008 and July 2009 facility annual reports provide conflicting and confusing information (compared to the PTC application). Please provide clarification for these numbers, consistent with the capacity and volume numbers prepared for this report.
 - a. In the July 2008 report, it was reported that the amount of waste disposed according to scale records since the opening date through the date of survey (Feb. 2008) was 623,788 tons. In the July 2009 report, it was reported that the amount of waste disposed according to scale records since the opening date through the date of survey (Feb. 2009) was 1,093,504 tons. The difference is nearly 400,000 tons but the amount of waste received annually is less than 200,000 tons.
 - b. In the July 2008 report, since opening of the landfill how much volume has been used as determined by aerial or survey was reported to be 887,445 cy. In the July 2009 report, since opening of the landfill how much volume has been used as determined by aerial or survey was reported to be 1,822,500 cy. The total gross capacity of Phase 1 is 1,632,050 cy.
 - c. It is noted that the 2010 annual report has been amended for the total airspace used as 1,944,448 cy. However, the total capacity of Phase 1 is 1,632,050 cy.
2. As noted in previous comments, the compliance review portion of the application is not complete.
 - a. A stand-by trust fund is required for the existing WCA financial assurance mechanisms (all WCA facilities) One stand-by trust fund may be used for all WCA facilities. Contact Donald Herndon to address this matter.
 - b. For WCA of High Point C&D Landfill, the financial assurance instrument is not up-to-date. The financial assurance amount, as approved February 2009 in the Permit to Construct Phase 2 application (Doc ID 6646), must be increased to \$4,097,495. This should have been submitted prior to the operation of Phase 2A (see Doc ID 6862).

If you have any questions please let me know.

Thanks, Donna

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