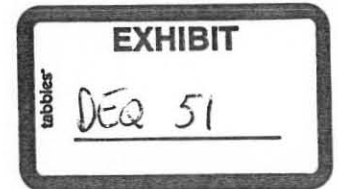




memorandum



To: Don Connell, Fremont County SWDD
From: Ken Schreuder, P.E., P.G.
cc: _____
Date: January 10, 2011
Re: Updates for January 10, 2011 Board Meeting

The following information is provided to update the Fremont County Solid Waste Disposal District (FCSWDD) on the status of various projects that are being managed by Trihydro Corporation (Trihydro).

Sand Draw Landfill / Permit / Project 09Y-001-002

The permit application for the Sand Draw Landfill was shipped to DEQ on December 23, 2010, approximately one week ahead of schedule. A paper copy of the permit application document has also been provided to the FCSWDD.

The final site life estimate for the original 80-acres of the Sand Draw Landfill is approximately 27 years, which means it will reach the proposed final waste grades in year 2037. (The 2010 capacity audit estimated 26 years, or year 2036.) Additional site life may be available if an alternative final cover system design is pursued. The preliminary site life estimate for the 137-acre expansion area is an additional 48 years, which equates to a closure date of approximately year 2085. The preliminary site life estimates for the expansion area are based on general assumptions regarding the area, depth, height, and slopes of the conceptual design plan.

At the request of Don Connell, Trihydro is preparing a cost estimate and proposal for estimating the cost of closing the Sand Draw Landfill. The cost estimate should be available for the February board meeting. Based on the plan of development proposed in the permit application, closure activities will be completed in four phases.

Shoshoni Landfill / Permit / Project 09Y-003-001

The target date for submitting the permit application for the Shoshoni Landfill is April 29, 2011. Work on the permit application for this facility is underway. We expect to have a project status meeting with DEQ later this month.

Sand Draw and Shoshoni Landfills / Monitoring / Project 09Y-001-003

The monitoring reports for the November 2010 events at Sand Draw and Shoshoni Landfills were submitted to DEQ on December 20, 2010. No VOCs were detected above the laboratory reporting limits in samples from the Sand Draw Landfill, although some were detected above the method detection limits. One VOC was detected a down-gradient well at the Shoshoni Landfill above the laboratory reporting



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limit but below the groundwater protection standard, and several other VOCs were detected above the method detection limit in the same well.

The 2011 first quarter monitoring events at the Sand Draw and Shoshoni Landfills is tentatively scheduled for January, and will include static water level gauging and groundwater samples from the Sand Draw Landfill, and static water level gauging at the Shoshoni Landfill.

Based on the topographic surveys of the Sand Draw and Shoshoni Landfills, which were completed in August 2010, there appear to be discrepancies with the elevations reported by previous IME surveys. WDEQ has indicated that the locations and elevations of the existing monitoring wells should be surveyed using the same datum used for the current topographic survey. Trihydro will present a proposal for surveying the wells at the Sand Draw and Shoshoni Landfills at the February board meeting.

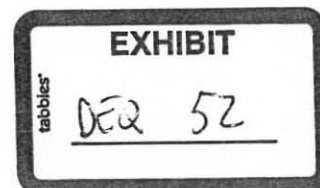
Riverton Recycling Center / Design, Permitting, and Construction / Project 09Y-002-001

Trihydro has received the engineering analysis for the two foundation alternatives for the Riverton Recycling Center. We've prepared revised plans and specifications for Majors Equipment, which will be issued today or tomorrow. Majors Equipment will be asked to prepare a cost estimate for the two options, which will be presented to the executive committee as soon as it is available. Because the original bid assumed heating for the concrete, Majors Equipment will be asked to show potential cost savings for deferring the project until the spring. Majors Equipment has requested revisions to the contract times to achieve substantial completion, and to address potential price increases in materials. The two issues identified by Majors Equipment will be addressed during the ongoing cost/contract negotiations.

Trihydro is planning to schedule a meeting with the City of Riverton the week of January 17 to review the options/issues for relocating the City's composting program to the Riverton Baler.

Questions and Additional Information

Please let us know if you have any questions or need additional information. You can call me on my cell phone (307-330-7737) or send me an email (kschreuder@trihydro.com).



memorandum

To: Don Connell, Fremont County SWDD
From: Ken Schreuder, P.E., P.G.
cc: Fremont County SWDD Board
Date: April 6, 2011
Re: Updates for April 11, 2011 Board Meeting

The following information is provided to update the Fremont County Solid Waste Disposal District (FCSWDD) on the status of various projects that are being managed by Trihydro Corporation (Trihydro).

Sand Draw Landfill / Permit / Project 09Y-001-002

On March 28, 2011, the DEQ issued a review of the renewal permit application submitted by Trihydro on December 23, 2010. Trihydro received a copy of the DEQ's review on March 31, 2011. The DEQ review identified three issues regarding PE/PG certifications, litter collection, and special wastes that were determined to be deficient. Trihydro is currently working on revisions to address these three deficiencies. The DEQ's letter implies that once the three noted deficiencies are addressed, the DEQ is prepared to issue a 4-year permit, which will meet the requirements of the Consent Decree between FCSWDD and the DEQ. Assuming the new permit is issued before July 1, 2012 (the effective date of Senate File 0073 for existing landfills with permits), the renewal permit will be converted to a lifetime permit when it expires in 4 years. However, the DEQ's review also includes comments imposing limitations on the life of the original 80 acres.

The permit application indicates that the original 80 acres will reach capacity in 2037 (i.e., approximately 26 years of remaining site life). Although the DEQ's review states that the portions of the permit application document describing site capacity and life are "complete" and "technically adequate", comments are provided to indicate that operations in the original 80 acres may not continue beyond December 31, 2018 (i.e., less than 8 years of remaining site life). The DEQ's comments refer to previous commitments by both parties that the original 80 acres would not receive wastes beyond 2018, as well as the DEQ's determination that a vertical expansion of the original 80 acres beyond 2018 would be considered a "new cell", and subject to engineered containment requirements. The DEQ comments indicate that if the FCSWDD wants to continue operations in the original 80 acres beyond 2018 without an engineered containment system, a performance-based design demonstration (as required by the recently passed legislation) will be required. Trihydro is currently reviewing the information provided by DEQ and will forward an analysis of regulatory and statutory issues.

Shoshoni Landfill / Permit / Project 09Y-003-001

The target date for submitting the permit application for the Shoshoni Landfill is April 29, 2011. Work on the permit application narrative and site plans is ongoing. At this time, the permit application is expected to be submitted on or before April 29, 2011.



Don Connell, FCSWDD

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As a follow-up to the Board's previous request for an aerial photo of the Sand Draw Landfill, Trihydro has provided, at no charge to FCSWDD, a mounted aerial photograph of the Shoshoni Landfill. The aerial photo is based on satellite imagery from 2008, and identifies the property boundaries, permit boundaries, and locations of groundwater monitoring wells.

Sand Draw and Shoshoni Landfills / Monitoring / Project 09Y-001-003

The 2011 first quarter monitoring events at the Sand Draw and Shoshoni Landfills were completed the week of February 7, 2011. The 2011 first quarter monitoring report for the Sand Draw Landfill was issued to DEQ and the FCSWDD on March 30, 2011. The static water level data for the Shoshoni Landfill will be reported with the static water level and laboratory results for the next quarterly event, which is tentatively scheduled for the week of April 25, 2011. Surveying of the monitoring wells was completed on April 6, 2011, and the data will be reported in conjunction with the reports for the April events.

The 2011 first quarter monitoring event at the Sand Draw Landfill detected only one volatile organic compound (VOC) in groundwater samples. Bromomethane was detected below the laboratory reporting limit in one up-gradient well (R-18) and one down-gradient well (R-21). Bromomethane was also detected below the laboratory reporting limit in the blind duplicate from down-gradient well R-20, but not in the compliance sample from well R-20. Toluene was detected below the laboratory reporting limit in the equipment blank, and appears to be associated with the distilled/deionized water used to prepare the sample. No VOCs were detected above the laboratory reporting limit during the 2011 first quarter monitoring event at the Sand Draw Landfill.

Riverton Recycling Center / Design, Permitting, and Construction / Project 09Y-002-001

The construction plans and specifications were submitted to the City of Riverton for review on March 23, 2011. The Construction Contract for the original bid package was forwarded to Majors Equipment on March 31, 2011, and is expected to be returned with the required bonds and documentation by April 15, 2011. Once the City of Riverton issues a construction permit, Trihydro will forward a Change Order to Majors Equipment for the grade beam foundation. A Notice to Proceed will be issued once the Change Order is fully executed, at which time will coordinate the construction schedule with Majors Equipment and the City of Riverton.

Ken Schreuder and Don Connell met with representatives of the City of Riverton (Bill Urbigkit, Paul Throckmartin, and Greg Schuab) on April 4, and discussed the recycling center project. Representatives of the City of Riverton indicated that they could not waive the construction permit application fees for the FCSWDD, and that the City was reluctant to provide financial support for the construction costs at this time. The representatives of the City of Riverton indicated, however, that they might be willing to consider purchasing some additional containers for the facility. Trihydro does not have a copy of the contract issued to Majors Equipment for constructing the building, so it is not clear if that contract



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included the associated permit application fees, or if it was assumed that the FCSWDD would be responsible for these fees. The construction contract issued to Majors Equipment for the installation of the water and sewer service, structural fill, methane venting system, and concrete includes the required water and sewer tap fees, but not construction permit application fees for the structure. Trihydro's scope of work is limited to the preparation of the design plans for the water and sewer service, structural fill, methane venting system, and concrete, but does not include permit application fees for the structure. Assuming the construction permit fees are based on the square footage of the building (4,860 sf), and the City of Riverton assesses fees at the new commercial building construction rate (\$0.47 per sf), the construction permit application fee will be \$2,284.20. This permit fee is not included in the updated project cost estimate (\$251,303) provided in Trihydro's February 11, 2011 project status report.

Riverton Composting Facility / Design and Permitting / Project 09Y-002-001

Ken Schreuder and Don Connell met with representatives of the City of Riverton on April 4, and reviewed the conceptual design plans developed by Trihydro for the composting facility. Representatives of the City of Riverton indicated that they were supportive of the conceptual design plans, and would be willing to reimburse the FCSWDD for 100% of the actual design and permitting costs (\$19,312). Representatives of the City of Riverton also indicated that they would continue to assume responsibility for hauling and placing the required fill material, and may be able to provide labor and materials to install culverts and other site construction activities. Based on the input provided by the City of Riverton, Trihydro will proceed with the preparation of final design and permit application documents.

Questions and Additional Information

Please let us know if you have any questions or need additional information. You can call me on my cell phone (307-330-7737) or send me an email (kschreuder@trihydro.com).