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10.195

Superintendent
Donald Connell

FREMONT COUNTY SOLID WASTE DISPOSAL DISTRICT

P.O. Box 1400
LANDER, WY 82520
telephone 332-7040
fax 332-5013

May 16, 2002

Patrick Troxel, Senior Environmental Analyst
WY Department of Environmental Quality
Solid and Hazardous Waste Division
250 Lincoln Street
Lander, WY 82520

RECEIVED

MAY 20 2002

RE: Riverton Sand Draw Landfill Permit

Solid & Hazardous Waste Div.
Lander, Wyoming

Dear Patrick;

As you know, the Riverton Sand Draw landfill permit is due this month (May of 2002). The District is again requesting an extension of 180 days to submit the Riverton Sand Draw permit. This would make the permit due on October 15, 2002.

The District has requested permit extensions at the Riverton landfill in the past due to a chain of events. Those events included a culturally significant area and high groundwater issues located within the expansion area.

During the term of the permit extensions, the District has drilled borings in the area of high groundwater to try to establish a better understanding of the geology/hydrology in that area. Reports detailing the geology/hydrology in the area of the higher groundwater have previously been submitted to the WDEQ/SHWD.

As the WDEQ/SHWD has been striving towards development of a guideline to evaluate the criteria for separation of waste from groundwater by identifying underlying soils, the District has also tried to implement that guidance at the Riverton landfill. The collaborative efforts of the WDEQ/SHWD and the District through the modeling, continuous sample drilling, and the additional monitor wells now provide information that suggests the potential to impact groundwater are minimal should the additional volume of waste be achieved by a vertical expansion. The newly established monitor wells will now also serve as "sentry" wells as described by the WDEQ/SHWD.

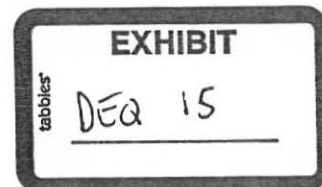
At the Regular meeting of the District Board on May 13, 2002, Inberg-Miller Engineers was authorized to prepare the permit document for submission to the WDEQ/SHWD. It will now require some time to put all the new information into a permit and add the new plans which is the reason for the requested permit extension time. We feel that the new permit submitted will now be a quality permit. Had a permit been submitted prior to this time, it would not have been a true representation of the landfill.

Please let me know if this permit extension is acceptable. Should you have any questions, please feel free to call me at 332-7040.

Sincerely,



Don Connell
Supt. of Oper.



10.195

Superintendent
Donald Connell

FREMONT COUNTY SOLID WASTE DISPOSAL DISTRICT

REC'D

P.O. Box 1400
LANDER, WY 82520
telephone 332-7040
fax 332-5013

March 17, 2003

MAR 19 2003

1774-RE

Solid & Hazardous Waste Div.
Lander, Wyoming

Mr. Dave Finley, Administrator
Wyoming Department of Environmental Quality
Solid and Hazardous Waste Division
122 West 25th Street – 4 West
Cheyenne, WY 82002

RE: SAND DRAW LANDFILL (SHWD FILE #10.195)

Dear Dave:

The Fremont County Solid Waste Disposal District (FCSWDD) would like to thank you and your staff for meeting with us on February 27, 2003. We felt the time spent was valuable to exchange ideas and understand each others position. As requested, this letter is written to formally present FCSWDD viable options and time schedules for a minimum five year plan for the Sand Draw Landfill, as required by state rules and regulations. The FCSWDD currently has 0.8 years of life left at this landfill.

The Board of Directors of the District met on March 10, 2003 and prioritized the options and schedules as follows:

Scope of Work

- Complete filling of the amended plan; loose fill in Cells No. 27 and 32-35 of the original 80 acres.
- Close the permitted asbestos area and complete filling over it, loose fill in Cells No. 6-9 and 14-15 of the original 80 acres.
- Construct a new access road along the north, west, and south sides of the original 80 acres.
- Complete filling of the amended plan; loose fill in access road "C" from west to east, and access road "A" from the asbestos area to the south boundary of the original 80 acres.

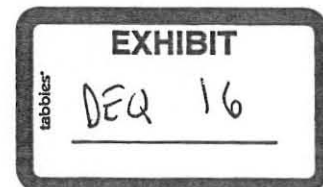
Time Schedule

February 1, 2003 to
December 31, 2003

January 1, 2004 to
June 30, 2004

January 1, 2004 to
September 30, 2004

July 1, 2004 to
December 31, 2004



Scope of Work

Time Schedule

- | | |
|--|---|
| • Prepare Phases 1A & 1B of amended plan to add vertical height, loose fill using large straw/hay bales to create above ground cells/wind breaks for litter control. | July 1, 2004 to
December 31, 2004 |
| • Begin filling Phases 1A & 1B loose fill | January 1, 2005 to
December 31, 2006 |
| • Complete reclamation in Phases 1A & 1B | January 1, 2007 to
December 31, 2007 |
| • Begin filling Phases 1C & 1D loose fill. | January 1, 2007 to
December 31, 2010 |
| • Complete reclamation in Phases 1C & 1D | January 1, 2011 to
December 31, 2011 |
| • Begin filling Phases 2A & 2B (exclusive of shop area) | January 1, 2011 to
December 31, 2013 |
| • Complete reclamation in Phases 2A & 2B | January 1, 2014 to
December 31, 2014 |
| • Begin filling Phases 2C & 2D | January 1, 2014 to
December 31, 2017 |
| • Complete reclamation in Phases 2C & 2D | January 1, 2018 to
December 31, 2018 |

Using the above approach will give the FCSWDD approximately 15 years to establish a more long-term plan for Municipal Solid Waste (MSW) from the northern portion of Fremont County. This could involve a baler facility that could increase the life of the original 80 acre site another seven to eight years, permitting one or two lined or unlined trenches on the 40 acres south of the existing landfill which could add eight to nine more years of life, or building a transfer facility to transport MSW to another District landfill.

Mr. Dave Finley, Administrator
Wyoming Department of Environmental Quality – SHWD
March 17, 2003
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All major construction and demolition waste would be directed to the District's Lander Landfill, possibly extending the Sand Draw Landfill life by a couple more years.

The current permit for Sand Draw expired on August 31, 1999. We understand there have been two extensions to this permit, which means the permit was due May 31, 2002. Therefore the renewal permit must have been submitted between August 31, 2001 and November 30, 2001. Obviously, this was not accomplished because of the time spent attempting to develop other options and funding mechanism in the past year. The FCSWDD respectively requests a two year term extension to May 31, 2004, to prepare a completely new plan and permit to include the above scope of work and schedules. The only large unknowns at this time is the use of the straw/hay bales to create cells to work above grade, and the design of armoring material to protect the exposed slopes on the up-wind sides (north, west, and south) from wind erosion. The FCSWDD would like to conduct a pilot project in 2003 with the straw/hay bales and further discuss with WDEQ-SHWD the composition of the armoring materials before instructing our engineer to proceed with final plans and permitting. We commit to you that we will pursue every effort to accomplish this on schedule.

Thank you again for your attention and we look forward to your response to this proposal in the near future.

Sincerely,



Jim Hedges
Chairman

Cc: Bob Doctor, WDEQ/SHWD-Casper
Patrick Troxel, WDEQ/SHWD-Lander ✓
Pat Hickerson, Fremont County Commissioner-Lander

CALENDAR OF EVENTS

SHWD File #10.195

Year

2004 | 2005 | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018

January 1, 2003 to December 31, 2003

January 1, 2004 to June 30, 2004

January 1, 2004 to September 30, 2004

July 1, 2004 to December 31, 2004

July 1, 2004 to December 31, 2004

January 1, 2005 to December 31, 2006

January 1, 2007 to December 31, 2007

January 1, 2007 to December 31, 2010

January 1, 2011 to December 31, 2011

January 1, 2011 to December 31, 2013

Jan. 1, 2014 to Dec. 31, 2014

Jan. 1, 2014 to Dec. 31, 2017

January 1, 2018 to December 31, 2018