Donald Connell

FREMONT COUNTY SOLID WASTE DISPOSAL DISTRICT

September 14, 2000

Wyoming Dept. of Environmental Quality Solid and Hazardous Waste Division Patrick Troxel Senior Environmental Analyst 250 Lincoln Street Lander, Wyoming 82520

See guad

10.195

332-5013

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

fax

SEP 1 5 2000

Solid & Hazardous waste Div. Lander, Wyoming

RE: Riverton Sand Draw landfill renewal permit due date extension.

Dear Patrick;

The Fremont County Solid Waste Disposal District has reviewed the due date for the renewal permit submission for the Riverton Sand Draw landfill. As discussed with yourself and Inberg-Miller representative Howard Johnson on August 30, 2000, the District delayed the submission because we hoped to save money with one last submission based on the possibility that lifetime permits would be implemented in the near future. It is now our understanding the lifetime permits may be a year or more from being implemented and the Department is requiring permits to be submitted by the current due dates. The District feels there are some outstanding issues associated with the Sand Draw renewal permit that would influence the completeness of a permit if it were submitted at this time.

The landfill has had a cultural area that was presumed to be of little significance at the time the District received the patent to the expansion area. The patent was issued with a restriction stating there would be no disturbance of the site until the site was cleared. The site is located in the middle of the South area in the expansion area.

Since the patent issuance the District, University of Wyoming, Bureau of Land Management, and qualified volunteers have made several attempts to clear the site with little success. In fact with each excavation the site has grown in cultural significance to where it is now one of the most important sites in Wyoming at this time.

The B.L.M. has stated that the site is interesting enough that they are pursuing federal grants to help clear the site and they feel that they will be successful in receiving the grants. The grants require about two years from the time they are submitted until the time they are actually received. The grants are also contingent upon appropriation of money for science by the federal government officials.

Since the cultural site is not likely to be cleared for some time and the potential significance is not yet clear, the District will need to submit revised plans of the South half of the expansion area. We will also reevaluate how much volume will be lost by going around the cultural site inclusive of a 10 foot buffer zone. To have new plans drawn up and address all the changes required will require some additional time and money.

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Patrick Troxel, WDEQ/SHWD SD landfill permit ext. request

Another change may be required in the plans contingent on some groundwater issues. As reported static water levels have changed in monitor well R-8 and it has not yet been determined why the level had increased and now apparently has the ability to recharge. The renewal permit will need to address this issue as it may influence the depth of the garbage and landfill areas/volumes.

One more issue which may become pertinent to the renewal permit is the treatment of petroleum contaminated soils. NewPark Environmental has contracted with the District to perform the treatment of the soils, has stated that there is a good chance that the current 4.5 acre site may not be adequate after the first year of operation. They have suggested a 25 acre site for the next year, but they will need more information and experience relating to types and volumes before they can make that determination.

If in the second year a request is made for the 25 acres, it could be permitted as an amendment again but it should be in the original permit if possible. The treated soils will also need to be accounted for in the renewal permit as they will effect the balance of the garbage to soil ratio. We will also need to determine what areas the treated soils will be allowed to be used for daily cover. This will be contingent upon the requirements associated with the increased water level of R-8.

With these pending issues, the District requests the WDEQ/SHWD allow an extension to the submission date to May 31, 2001. Thank you for your time and consideration of this new submission date.

Sincerely, Imme

Don Connell Supt. of Opr.

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JIM GERINGER GOVERNOR

Department of Environmental Quality

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ABANDONED MINES	AIR QUALIT	Y	LAND QUALITY	SOLID & H	AZARDOUS WASTE	WATER QUALITY
(307) 332-5085	(307) 332-675	5	(307) 332-3047	(30	7) 332-6924	(307) 332-3144

September 26, 2000

Don Connell, Superintendent Fremont County Solid Waste Disposal District P.O. Box 1400 Lander, Wyoming 82520

RE: Sand Draw Landfill SHWD File # 10.195 Shoshoni Landfill SHWD File # 10.220

Dear Mr. Connell:

The Wyoming Department of Environmental Quality (DEQ) has reviewed your requests for extensions of submitting renewal applications for the referenced facilities. The permit application for the Shoshoni landfill was due on April 10, 2000, and will be extended to October 31, 2000. The permit application for Sand Draw landfill was due on August 31, 2000 and will be extended to May 31, 2001.

It is extremely important for these permits to be renewed in a timely manner, therefore, these are one-time extensions. Should you have any questions, please feel free to contact me at (307) 332-6924 or at <u>ptroxe@state.wy.us</u>

Sincerely,

Patrick J Troxel Senior Environmental Analyst Solid and Hazardous Waste Division

cc: Landfill SHWD File # 10.195 Landfill SHWD File # 10.220 Cheyenne SHWD File # 10.195 Cheyenne SHWD File # 10.220

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