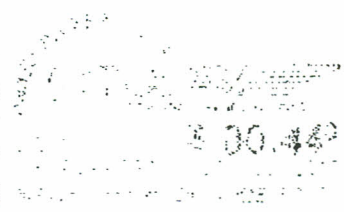
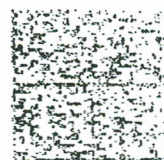




# Department of Environment

To protect, conserve and enhance the quality of environment for the benefit of current and future generations.



Dave Freudenthal, Governor

John Corra, Director

October 28, 2010

Jim Hedges, Chairman  
Fremont County Solid Waste Disposal District  
P.O. Box 1400  
Lander, Wyoming 82520

**received**  
11-1-10

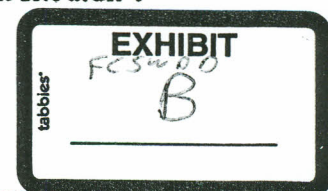
RE: October 19<sup>th</sup> Meeting – Sand Draw Landfill Issues and Permitting

Dear Mr. Hedges:

This letter provides a summary of discussions on the Sand Draw landfill from the October 19, 2010, meeting between the Department, the Fremont County Solid Waste Disposal District (District), and Senator Eli Bebout. In addition to Senator Bebout, the meeting was attended by FCSWDD board members Dale Groutage and Mike McDonald, and Department personnel John Corra, Patrick Troxel, Bob Doctor and me. I appreciate the board's willingness to meet to discuss landfill issues. I believe the discussions were open and productive.

The following are generally points of discussion and resolution from the meeting:

1. Senator Bebout reiterated the need to get the landfill permitted.
2. The parties agreed that moving out of the unlined existing cell to a lined expansion area cell should occur as soon as reasonably possible. Through the current permitting process, a decision will be made on the appropriate date to close the existing cell and move to the lined expansion area. It was agreed this date would be greater than 6 years (the Department's assumed timeframe for closure), but less than 26 years (the District's current capacity assessment for the existing cell).
3. The District agreed the first new cell in the expansion area would be constructed with an engineered containment system (ECS).
4. The approved permit application and permit will contain a contingency regarding changes in groundwater quality (negative impacts from the unlined cell) necessitating an expedited closure of the existing cell and starting waste disposal in the lined expansion cell.
5. It was noted that the estimate for site life contained in the planning document shouldn't be considered a default for site permitting.



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If you believe the above doesn't adequately capture our discussions and resolutions, please let me know in writing what your specific concerns are so we may work through them.

I would also like to take this opportunity to follow-up on the October 20, 2010, meeting between the District (Dale Groutage and Don Connell), its consultant (TriHydro represented by Ken Schreuder) and the Department (Patrick Troxel) on the renewal permit application for the Sand Draw landfill. Based on those discussions, the Department would like to propose the following regarding the District's timeframe for moving into the expansion area at the Sand Draw landfill.

The Department understands the District needs additional time to make financial preparations for moving into the expansion area. Therefore, we would like to propose renewal permit conditions which would allow sufficient time for the District to take the necessary financial actions in order to install the ECS. Taking these issues into consideration, the Department would like to propose that the facility be permitted for disposal in the current 80 acres until January 1, 2028. This would give the District an additional 17 years to make the necessary financial arrangements for constructing an ECS in the expansion area.

Lastly, in order to ensure that progress is being made toward the ECS requirements, the Department is recommending a permit condition requiring the next renewal permit to include detailed designs for the ECS. This would ensure that all the necessary design and permitting actions are completed well in advance.

I would please ask that you work with Patrick to formalize the above resolutions and recommendations as part of the permitting process. If you should have any questions regarding this letter, please feel free to contact me at 307.777.7753 or [cander@wyo.gov](mailto:cander@wyo.gov).

Sincerely,



Carl Anderson, Ph.D.  
Administrator, Solid and Hazardous Waste Division

C: Senator Bebout  
John Corra  
Bob Doctor  
Patrick Troxel  
Sand Draw file