



**Applied Soil Water
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October 16, 2012

Waste Management of Nevada, Inc.
2401 Canyon Way
Sparks, NV 89434

**Attn: Mr. Joe Prary
District Manager**

**RE: Maximum Open Area
Revised Closure and Post Closure Cost Estimates
Nevada Division of Environmental Protection
Comments Letter Dated September 26, 2012
Permit SW214R01 Modification Application Dated December
28, 2011
ASW Project No. 002-047**

Mr. Prary,

This letter presents Applied Soil Water Technologies, LLC (ASW) response to the Nevada Division of Environmental Protection, Bureau of Waste Management's (NDEP-BWM) comments with respect to Closure/Post-Closure in their letter dated September 26, 2012. Specifically this letter presents a phased closure sequence and the largest open area to be considered for each closure phase. An update to the Closure/Post-Closure cost estimate for the first phase of closure with respect to the proposed expansion is also presented.

The Lockwood Regional Landfill (LRL) is operated as a close-as-you-go facility. That is, as sections of exterior bench slopes are completed, final cover is placed on the slope face and the associated set back. Therefore, when a bench is completed the only open area is the top of that respective bench.

Table 1 presents the net open area and the cumulative closed area associated with each bench of the proposed landfill expansion through the first two closure phases. Table 2 presents the maximum open area for each closure phase and the approximate percentage of capacity that will be filled at the end of each closure phase. The open area was determined as the area of the top of the bench. The cumulative closed area was calculated as the slope face and set back areas for the current bench and all benches below.

The areas presented in Table 1 were determined using areas and dimensions obtained from the design drawings using Autocad Civil 3-D[®], 2011. For convenience of correlating Table 1 with drawings submitted in the permit modification application, phasing is included in the table.

Table 1 – Bench Open Areas

Closure Phase	Landfill Development	Bench	Set Back Area, ft ²	Top Area, ft ²	Slope Area, ft ²	Cumulative Closed Area, ft ²	Net Open Area, ft ²
1	Phase 1	4B	4,290	63,948	33,891	38,181	63,948
		5B	10,490	394,200	58,539	107,210	394,200
		6B	17,900	849,420	113,523	238,633	849,420
		7B	30,640	1,707,770	190,390	459,663	1,707,770
	Phase 2	2	4,010	38,968	31,679	495,352	1,746,738
		3	8,710	442,810	49,691	553,753	2,150,580
		4	13,180	1,104,025	86,268	653,201	2,811,795
		5	18,870	1,741,574	127,111	799,182	3,449,344
	Phase 3	6	24,790	2,591,486	172,220	996,192	4,299,256
		7	29,830	3,779,540	215,591	1,241,613	5,487,310
2	Phase 4	8	168,020	13,513,507	1,329,254	2,738,887	13,513,507
	Phase 5	9	170,590	13,904,905	1,337,628	4,247,105	13,904,905
	Phase 6	10	175,920	14,669,138	1,369,939	5,792,964	14,669,138
	Phase 7	4A	4,950	34,993	39,105	5,837,019	14,704,131
		5A	8,710	170,530	52,851	5,898,580	14,839,668
		6A	18,230	378,630	106,571	6,023,381	15,047,768
		7A	24,030	586,703	167,559	6,214,970	15,255,841
		8A	27,310	890,140	203,109	6,445,389	15,559,278
		9A	30,860	1,461,944	230,917	6,707,166	16,131,082
		10A	35,790	2,223,624	263,702	7,006,658	16,892,762

Table 2 – Closure Phase Areas and Percentage of Capacity

Closure Phase	Maximum Open Area, ft ²	Percent of Capacity at End of Phase
1	5,487,310	20
2	16,892,762	47
3	16,287,479	57
4	14,821,838	67
5	13,314,143	75
6	11,090,232	82
7	8,832,929	88
8	6,174,000	92
9	4,056,505	96
10	2,439,048	100

When an area is at final grade, final cover will be placed and construction quality assurance performed as required in the Closure/Post-Closure Maintenance Plan. Request for certification that each area is closed will be made to the NDEP-BWM.

Ninety days prior to initiating operations into a closure phase 2, Waste Management will provide the NDEP-BWM with an updated financial assurance statement.

Ninety days prior to the completion of closure phase 2, Waste Management will present to the NDEP-BWM plans for maintaining financial for the remainder of landfill operations.

We trust this information suits your current need. If you have any questions please do not hesitate to contact us at 775-284-5500.

Sincerely,
 Applied Soil Water Technologies, LLC

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 VALCESCHINI
 10/16/12
 CIVIL
 No. 0265
 Exp. 06/30/14

Robert B. Valceschini, P.E.
 Principal/Senior Engineer

Cc: Mr. Mark Franc, P.E., Waste Management
 Mr. William Carr, P.E., Waste Management