



LOCKWOOD REGIONAL LANDFILL  
2401 Canyon Way  
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October 26, 2012

Mr. Jon Taylor, PE CEM  
Bureau of Waste Management  
Solid Waste Branch  
901 S. Stewart Street, Suite 4001  
Carson City, Nevada 89701

**Reference: With Respect to NDEP Correspondence dated Sept 26, 2012**

**Subject: WM Response to Preliminary Review of Modification Submittal  
Lockwood Regional Landfill  
Storey County, Nevada**

Dear Mr. Taylor,

Please find attached to this letter the additional information and changes to our Modification submittal, which you requested in your September 26, 2012 letter to us.

If you have any questions or comments, please do not hesitate to contact me.

Sincerely,

Joseph Prary P.E.  
District Manager  
Refuse, Inc.

Cc: Mark Franc, P.E., WM Senior Engineer  
Tianna Nourot, WM Environmental Protection Manager



## Applied Soil Water Technologies, LLC

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October 26, 2012

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

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

**Re: Response to State of Nevada  
Division of Environmental Protection  
Correspondence dated 09/26/2012.  
Permit Modification Application – Permit Number  
SW214R01  
Lockwood Regional Landfill  
Storey County, Nevada  
ASW Project No. 002-047**

Mr. Prary,  
Applied Soil Water Technologies, LLC (ASW) is pleased to submit this letter in response to the comments provided by the Nevada Division of Environmental Protection, Bureau of Waste Management (NDEP-BWM) in their letter dated September 26, 2012 regarding the Modification Request (Modification) for Lockwood Regional Landfill, Storey County, Nevada. The following narrative describes revisions to the Modification Request as a result of NDEP comments.

For ease of review, ASW has provided in *italics* the *comments* from the NDEP letter dated September 26, 2012 (Letter) and the **responses in bold**.

NDEP Comment:

*If the current drawing set of application modification require a change please provide a listing of the required changes as instructions.*

**The requested instructions follow; please note that full size drawings listed below are provided with this letter:**

- 1. Replace the Sheet A-1, Title Sheet, with the attached Title Sheet with revision date 10-24-12. Please replace the current Sheets D-1 and D-2 with the attached Sheets D-1 through D-12 with revision date 10-24-12.**

NDEP Comment:

*Please provide additional detail on how the Financial Assurance and Closure/Post-Closure of the Site will proceed. Include requesting confirmation of Closure (for each of the phases) from the Division in conjunction with the Financial Assurance requirements for the Facility.*

**Our response to this comment is presented in Attachment A with the following explanation.**

- 1. In A.1 is a letter which provides details of the phased closure.**
- 2. Please replace Section 2 of the Closure/Post-Closure Plan in its entirety with Section 2 in provided in A.2. These changes include language requesting certification of closure from the NDEP-BWM on completion of a portion of final cover and adds a table presenting the phased closure schedule.**

**An updated closure cost estimate for the first phase of closure is currently being prepared.**

NDEP Comment:

*Please remove any reference to discharge of surface waters or otherwise to Long Valley Creek, the Division has no authority to permit this activity.*

**This language has been changed. Following are instructions to accommodate this comment.**

- 1. Please replace pages 4-3 and 4-14 of the Permit Modification Application with pages 4-3 and 4-14 provided in Attachment B.**
- 2. Revisions were made to pages 3-25 and 3-26 of the Engineering Design Report. Section 3 of the Engineering Design Report is being replaced in its entirety as described below.**

NDEP Comment No. 1:

*Please provide a detail of the Soil to HDPE interface (Drawing B-1) with all necessary calculations in the C&D Area.*

**Our response to this comment is presented in Attachment C. Within attachment C are revisions to the Engineering Design Report. To incorporate these revisions please do the following:**

- 1. Replace the Table of Contents, List of Figures and List of Tables with those provided in Attachment C.**
- 2. Replace Section 3 in its entirety with Section 3 provided in Attachment C.**
- 3. Replace Appendix G with Appendix G provided in Attachment C.**
- 4. Replace the Reference Section in its entirety with the Reference Section provided in Attachment C.**
- 5. Include the tables provided in Attachment C in the table tab.**
- 6. Include the figures provided in Attachment C in the figures tab.**

NDEP Comment No. 2:

*For the "Monitoring Clusters" (Drawing D-1) please provide the following:*

- Retention Pond Details*

- *Vadose Monitoring Details*
- *Details for Methane Probes*

**Retention pond locations are presented in Drawings Sheet D-5 through D-11, attached.**

**Vadose monitoring details and details for methane probes are provided in the updated Modification to the Facility Monitoring Plan provided in Attachment D. Please replace the previous Modification to the Facility Monitoring Plan in its entirety with the attached modification.**

NDEP Comment No. 3:

*Please provide Leachate Sump Details and management in accordance with NAC 444.680(c)(4) and NAC 444.684(4)(f).*

**A detail of the leak detection sump for the leachate collection ponds is presented on Drawing Sheet D-12, attached.**

**Comments with respect to NAC 444.680(c)(4) and NAC 444.684(4)(f) are addressed in Section 11 of the operations plan. Please replace Section 11 of the Operations plan in its entirety with Section 11 provided in Attachment E.**

NDEP Comment No. 4:

*Please provide details for the proposed Groundwater Monitoring Wells for the expansion area.*

**These details are provided in the updated Modification to the Facility Monitoring Plan referenced above.**

NDEP Comment No. 5

*For the proposed Construction and Demolition Area include a daily cover interval and thickness.*

**This comment is addressed on pages 5-6 and 6-2 of the Operations plan. Please replace pages 5-6 through 5-13 with pages 5-6 through 5-13 provided on Attachment F. Please replace page 6-2 with page 6-2 provided in Attachment F.**

NDEP Comment No. 6:

*Please provide details for the Methane Monitoring Probes installation.*

**These details are provided in the updated Modification to the Facility Monitoring Plan referenced above.**

NDEP Comment No. 7:

*Include into the Closure/Post-Closure Plan Soil loss for the post-closure period using the Revised Universal Soil Loss Equation (RUSLE), or equivalent.*

**The calculations are in progress and will be submitted upon completion.**

We trust this information suits your current need. Please do not hesitate to contact us with any questions or comments.

Sincerely,  
**Applied Soil Water Technologies, LLC**



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



Daniel M. Cycholl, E.I.  
Project Professional

Attachments: Full Size Drawing, Sheets  
A-1, D-1 through D-12

Attachment A – Support to Phased Closure Comments  
Response

Attachment B – Support to Long Valley Creek Comment Response

Attachment C – Support to C&D Area Comments Response

Attachment D – Support to “Monitoring Clusters” Comments Response

Attachment E – Support to Leachate Sump Comments Response

Attachment F – Support to C&D Area Cover Comments Response