WASTE MANAGEMENT

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August 20, 2012

Mr. Jon Taylor, P.E., C.E.M.
Staff Engineer, Bureau of Waste Management
Nevada Division of Environmental Protection
901 S. Stewart St.
Carson City, Nevada 89701

Subject: Lockwood Regional Landfill Permit 214REV01

Re: Proposed Reporting Format for Routine Semi-Annual Environmental Monitoring Reports

Dear Mr. Taylor:

Waste Management is pleased to submit to the Nevada Department of Environmental Protection (NDEP) the attached document describing the proposed reporting format for routine Semi-Annual Environmental Monitoring Reports for the facility. In a letter dated April 11, 2012, NDEP requested that a revised reporting format be submitted for the existing monitoring program. The revised format is based on previous discussions with NDEP, as well as guidance provided in the NDEP reporting template.

We are hopeful that the new reporting format effectively captures the important elements of the program discussed during our past discussions. If you have any questions or comments reading the information provided, please do not hesitate to contact me at (916) 294-4162.

Sincerely,

James M. Obereiner
Waste Management

Attachments: Revised Reporting Format

Cc: Joe Prary, Refuse, Inc.
Erica Gonzalez, WM
Mark Franc, WM

ATTACHMENT 1
REPORTING FORMAT FOR ENVIRONMENTAL MONITORING
LOCKWOOD REGIONAL LANDFILL

1. **COVER LETTER:** A cover letter prepared and signed by Refuse, Inc., will accompany each routine environmental monitoring report.

2. **TITLE PAGE**: The title page will identify: (1) facility name, location, owner/operator, and NDEP facility identification number; (2) description of the report – i.e. "2012 First Semi-Annual Environmental Monitoring Report"; (3) preparer of the report; and (4) submittal date.

3. **EXECUTIVE SUMMARY**: This section will provide a brief summary of the purpose, scope and results of the environmental monitoring conducted at the subject site during the reporting period. The site facility name, address and NDEP facility identification number(s) will be included in the executive summary. In addition, this section will include a brief summary of conclusions based on the monitoring results and any issues of non-compliance related to the environmental monitoring will be identified.

4. **TABLE OF CONTENTS**: The table of contents will list all text sections and subsections, tables, figures and appendices or attachments included in the report. The corresponding page numbers for the titles of each component of the report will be included in the table of contents.

5. **INTRODUCTION:** This section will include the facility name, facility address, facility status (e.g. compliance, corrective action, post-closure care, etc), NDEP facility identification number(s), the name of the owner/operator of the facility and the purpose and type of monitoring being conducted (e.g. quarterly, semi-annual, annual, closure, etc.). Pertinent background information will be provided in this section, and a summary of all activities actually performed during the monitoring period including field data collection, laboratory testing, and remediation system monitoring, if applicable.

6. **GROUNDWATER MONITORING RESULTS:** This section will provide a summary of the results of groundwater monitoring conducted at the site including, but not limited to, the dates that groundwater monitoring was conducted, the measured depths to groundwater, direction(s) of groundwater flow, field water quality measurements and a comparison to previous groundwater monitoring results. Field observations or conditions that may influence the results of groundwater monitoring will be reported in this section. Analytical data from the previous 5-years of monitoring will be presented on summary tables and in graphs showing both historical and current parameter concentrations in comparison to established statistical compliance limits. Incidents of non-compliance with

regard to detected parameter concentrations will be identified and addressed in this section.

7. **VADOSE ZONE MONITORING RESULTS:** This section will provide a summary of the results of vadose zone monitoring conducted at the site including the dates of sampling and a discussion of field observations or conditions that may influence the results. Analytical data will be presented in summary tables and a discussion of current results compared to previous findings will be provided.

8. **METHANE MONITORING:** This section will provide a summary of the results of methane monitoring in subsurface perimeter gas probes and in on-site structures, including the dates of sampling and a discussion of field observations or conditions that may influence the results. The results will be compared to regulatory criteria and incidents of non-compliance will be identified and addressed.

9. **SUMMARY:** This section will provide conclusions and recommendations with regard to the results of environmental monitoring conducted at the site. A summary of any incidence of non-compliance concerning the environmental monitoring data will be provided, along with follow-up actions taken or planned based upon such findings. This section will also include discussion of other noteworthy results, data gaps or other issues that may compromise the effectiveness of the monitoring program, and recommendations for future monitoring as appropriate.

- **LIST OF TABLES**

The following summary tables/graphs will be included in each environmental monitoring report.

- Summary of groundwater elevation and depth to groundwater data. The table will include the monitoring well depths and the screened intervals in each well.
- Summary of 5-year historical field measurements of water quality data.
- Summary of 5-year historical groundwater laboratory analytical data.
- Summary of 5-year historical vadose zone laboratory analytical data.

- **LIST OF FIGURES**

The following figures will be included with each environmental monitoring report. All figures will include a scale, north arrow, and explanation for abbreviations, symbols, acronyms and qualifiers.

- Vicinity map showing topography and the general location of the subject site relative to surrounding features or properties.
- Facility site plan that presents pertinent site features and structures, and shows the locations of monitoring devices.
- Figure presenting groundwater elevation data and indicating groundwater flow direction(s).

❖ LIST OF APPENDICES

- Field Methods: The methods used to measure groundwater elevations, purge and sample wells, and purge and sample lysimeters will be included in this appendix. Field forms utilized during the collection of environmental samples will also be included in this appendix.
- Laboratory Analytical Reports: This appendix will include information on laboratory analytical methods, reporting limits, lab QA/QC results, lab results and chain-of-custody documentation for the current reporting period.
- Statistical Evaluation Methods: This appendix will describe the results of the statistical evaluation of groundwater monitoring data for the current reporting period.