



STATE OF NEVADA  
Department of Conservation & Natural Resources  
DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor  
Leo M. Drozdoff, P.E., Director  
Colleen Cripps, Ph.D., Administrator

April 11, 2012

Joe Prary  
Waste Management of Nevada  
2401 Canyon Way  
Sparks NV 89434

Reference: With respect to Waste Management of Nevada and the correspondence dated 12/28/11

Subject: Modification Request (Modification)

Dear Mr. Prary:

Thank you for your application for a Modification to the current Permit for the Lockwood Landfill. The Nevada Division of Environmental Protection (Division) has had an opportunity to conduct a preliminary review of the Modification. Prior to continuing the review the Division will need further clarification of the design as noted below. Please provide a complete response to these comments no later than May 21<sup>st</sup> 2012.

The current Groundwater Monitoring System and Network is deemed by the Division to be inadequate in the context of this Modification request. Accordingly, pursuant to NAC 444.7483 the Division requires the submission of a supplemental monitoring program to ensure any leakage from the facility is detectable. For the existing Groundwater Monitoring network, in accordance with NAC 444.7488 Waste Management shall submit a proposed detection monitoring program and reporting format for review and approval in conjunction with this Modification request. The Lockwood Landfill has been in monitoring for some time and has a sufficient number of data points to establish a detection monitoring program. The proposed detection monitoring program must include those requirements as stated in NAC 444.7481 through NAC 444.7493.

Please provide a cost estimate for Closure and Post-Closure of the facility in accordance NAC 444.6851 and NAC 444.68515. Please also include a copy of the chosen Financial Instrument in accordance with NAC 444.68525.

The Division has noted the inclusion of a Construction & Demolition (C&D) area [Drawing F-1]. As this is implied to be a dedicated C&D facility it would be regulated pursuant to NAC 444.733 as defined by NAC 444.585(p). Waste Management must provide in conjunction with this Modification a change to the existing Class I Landfill Operations Plan incorporating NAC 444.652. Also include a liner design for this area as well.

Please provide further detail for the drawing sets, as a matter of note some of the drawings are quite "busy", for clarity and ease of review consider adding a drawing [F-1DetailA for example] for those requested details below. For the Final Configuration drawing [D-1], please include all structures that will remain in place at closure i.e. gas monitoring, groundwater monitoring, drainage and collection systems fencing, roads etc. Please also reduce the "busyness" of this drawing as well. It is difficult to determine flowlines due to the lack of elevations included in the drawings.



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Provide design calculations for all the anchor trenches, sheet G-1H.

Include an outline of the Construction Quality Assurance program in accordance with NAC 444.645  
Please provide further detail for the two liner systems drawing sheet G-1, including where they may be  
"stitched" together, these may be shown on the drawings as well.

For the drawing sets as follows please provide the following:

1. Drawing F-1  
2 Cross Sections of the C&D area  
Northeast Run-On Channel show details for the discharge to Natural drainage or Structures with direction of flow and contributing watershed. Are channels supercritical?
2. Drawing F-2  
Cross Section for this phase of the HDPE lined area  
East Run-On Channel show details for the discharge to Natural drainage or Structures with direction of flow and contributing watershed. Are channels supercritical?
3. Drawing F-4  
Cross Section for this phase of the HDPE lined area
4. Drawing F-6  
2 Cross Sections of the HDPE Lined area
5. Drawing F-8  
2 Cross Sections of each of the HDPE Lined areas
6. Drawing F-10  
2 Cross Sections
7. Drawing F-13  
2 Cross Sections

Any questions regarding this may be directed to the undersigned at 775-687-9477 or [jtaylor@ndep.nv.gov](mailto:jtaylor@ndep.nv.gov).

Sincerely,



Jon Taylor PE CEM  
Staff Engineer III  
Solid Waste Branch  
Bureau of Waste Management

JT:jm

cc: Erica Gonzalez, 11931 Foundation Place Suite 200, Gold River, CA, 95670  
Mark W. Franc PE, 3683S 4975W, West Haven, UT, 84401

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