

EXHIBIT H



WASTE MANAGEMENT
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May 11, 2017

Ms. Joyce Munie, P.E.
IEPA - Bureau of Land
Permit Section
1021 North Grand Ave. East
Springfield, Illinois 62702

**RE: Laraway Recycling and Disposal Facility
IEPA #1970450002 - Will County, Illinois
ILD074411745
Class 1* Permit Modification**

Dear Ms. Munie:

This letter and its attachments are being submitted as a Class 1* permit modification to request authorization to 1) update the post-closure cost estimate for the closed RCRA unit, 2) update the closure/post-closure plans and cost estimates for the stack corrective action, 3) update the closure/post-closure plans and cost estimates for the solid waste expansion, and 4) revise the leachate monitoring schedule at the Laraway Recycling and Disposal Facility. This application consists of the following:

1. This letter;
2. LPC-PA23, RCRA Permit Application Form;
3. Attachment 1 – Updated Post-Closure Cost Estimate (Table I-2);
4. Attachment 2 – Updated Corrective Action Closure Plan;
5. Attachment 3 – Updated Corrective Action Post-Closure Plan;
6. Attachment 4 – Updated Solid Waste Expansion Closure/Post-Closure Plan.

Updated RCRA Post-Closure Cost Estimate

In accordance with Permit No. B-141R, condition VIII.34, the RCRA unit post-closure costs have been revised to reflect current costs and have been increased by the 2016 CPI of 1.3%. In accordance with the permit, post-closure costs have been estimated until September 2022. Financial assurance documentation will be submitted within 90 days of Agency approval for the amount outlined on Table I-2 from the post-closure plan. The revised cost estimate is included in Attachment 1 to this submittal. *If approved, please replace the existing Table I-2 from the RCRA post closure plan contained in the approved Part B permit application binder 1 and replace with the revised Table I-2.*

Updated Corrective Action Closure/Post-Closure Plans

In accordance with Permit No. B-141R, the closure and post-closure plans and associated cost estimates for the stack corrective action have been revised to reflect current costs and have been increased by the 2016 CPI of 1.3 %. The south stack top slope sedimentation basin, 104 acres of geomembrane cap, south stack grading, perimeter toe drain, and a portion of the moat cleaning have been completed to date and are noted in the revised closure plan. Financial assurance documentation will be submitted within 90 days of Agency approval in the amounts outlined on Tables 10-1 and 11-2 of the revised plans contained in Attachments 2 and 3 of this submittal. *If approved, please replace the existing Sections 10.0 and 11.0 from the North and South Stack Corrective Action Plan permit application binder 1 and replace with the revised Sections 10.0 and 11.0.*

Updated Solid Waste Unit Closure/Post-Closure Plans

In accordance with Permit No. B-141R, condition III.K.8., the closure and post-closure plans have been revised to reflect current costs and have been increased for inflation by 1.3%. In addition, as noted in permit condition III.J.5, the closure and post-closure cost estimates have been revised to account for only those areas for which operating authorization has been obtained or is being requested. The closure/post-closure plans and associated cost estimates assume that the existing solid waste unit, Interim Horizontal Expansion, and Phases 1 through 8 are in place. The site anticipates submitting the Phase 8 liner certification reports later this year, therefore, the costs as presented are conservative for the existing conditions. Financial assurance documentation will be submitted within 90 days of Agency approval in the amounts as outlined on Table 13-3 of the closure/post-closure plan contained in Attachment 4. *If approved, please replace the existing Section 13.0 from the Solid Waste Expansion permit application binder 1 and replace with the revised Section 13.0.*

Revised Leachate Monitoring Schedule

The leachate monitoring schedule as outlined in permit condition III.I.5. is being revised to include leachate monitoring points L311 and L312. The proposed schedule is outlined below:

<u>Sampling period</u>	<u>Sample points</u>	<u>Lists</u>
Oct-Nov 2017	L309, L310, L311 LREP	L1 L2
April-May 2018	L312, L301, L302	L1
Oct-Nov 2018	L303, L304, L305 LREP	L1 L2
April-May 2019	L306, L307, L308	L1
Oct-Nov 2019	L309, L310, L311 LREP	L1 L2
April-May 2020	L312, L301, L302	L1
Oct-Nov 2020	L303, L304, L305 LREP	L1 L2

**TABLE I-2
LARAWAY RECYCLING AND DISPOSAL FACILITY
POST-CLOSURE COST ESTIMATE**

ITEM DESCRIPTION	ASSUMPTIONS & COMMENTS	UNIT	UNIT RATE	NUMBER OF UNITS PER EVENT	NUMBER OF EVENTS	TOTAL
GENERAL MAINTENANCE & INSPECTIONS						
General maintenance of RCRA Unit (all O&M efforts except for specific line items below)	Utilities, labor, and materials	Per Year	\$20,000	1	6	\$120,000
Mow & fertilize vegetative cover	fertilize as needed, mow annual	Per Acre	\$40	55	6	\$13,200
Redress final cover (minor grading & vegetation)	Two acres every five years	Per Acre	\$1,800	2	2	\$7,200
Inspect cover, runoff/runoff systems	4 times/year	Per Inspection	\$500	4	6	\$12,000
Inspect Gas & Leachate Systems	4 times/year	Per Inspection	\$500	4	6	\$12,000
Inspect emergency/safety equipment	4 times/year	Per Inspection	\$250	4	6	\$6,000
Inspect Fence & Gates & Benchmark	4 times/year	Per Inspection	\$500	4	6	\$12,000
GROUNDWATER SAMPLING & ANALYSIS (2)						
Analytical Costs	38 wells with analytical	Per Sample	\$765	38	6	\$174,420
Sampling costs (includes elevation only wells)	41 wells for entire yearly program	Per Sample	\$431	41	6	\$106,026
LEACHATE SAMPLING, ANALYSIS & DISPOSAL						
Sampling & Analysis - every year	Full Appendix I list (4 samples/yr)	Per Event	\$1,350	4	6	\$32,400
Monthly level monitoring	DTMs and leachate wells(28 points/month)	Per Sample	\$25	28	72	\$50,400
Leachate Management - O&M	Utilities, labor, and materials	Per Year	\$35,000	1	6	\$210,000
Transportation & Disposal	260 loads/yr @ 4500 gallons/load	Per Gallon	\$0.17	1,170,000	6	\$1,193,400
GROUNDWATER EXTRACTION SYSTEM						
Groundwater Extraction System O&M	Utilities, labor, and materials	Per Year	\$50,000	1	6	\$300,000
REPORT SUBMITTALS/CERTIFICATIONS						
Misc. reporting	groundwater, RCRA, leachate	Per Year	\$15,000	1	6	\$90,000
Post-closure certification	at end of post-closure period	One time	\$5,000	1	1	\$5,000
TOTAL POST-CLOSURE COST						\$2,344,046
2010, 2011, 2012, 2013, 2014, 2015, 2016 CPI increases of 1.2%, 2.1%, 1.8%, 1.5%, 1.4%, 1%, 1.3%						\$2,596,301

NOTES:

- (1) Per Permit Log No. B-141R, post -closure to continue until 9/10/2022, or 6 years.
(2) Includes sampling, evaluation, development of contour maps.

ATTACHMENT 2

UPDATED CORRECTIVE ACTION CLOSURE PLAN