

EXHIBIT P

Johnson, Ian

From: Roop, John J. <John.Roop@Illinois.gov>
Sent: Monday, May 20, 2024 8:47 AM
To: Johnson, Ian; Rubak, Chris
Cc: Dial, Shawntay D.; Wagner, Ed; Sinnott, Bill
Subject: [EXTERNAL] Laraway RDF Cost Estimate

Hello Mr. Johnson and Mr. Rubak,

The Illinois EPA RCRA Unit currently has the 2023 Cost Estimate for Laraway RDF (1970450002) under active review. Please see the questions and comments below.

- A. Permit Modification M-125 dated October 10, 2023, has a total of \$6,231,400 for Closure of the South Stack SWMU from Table 10-1 and \$4,811,354 for Post Closure Care (30 years) with a total of \$11,042,754. The most recent permit modification before this is June 29, 2022, Log NO. B-141R-M-164 which has the exact same numbers. According to Table 10-1 of M-174, the estimated closure cost of the South Stack SWMU is \$6,646,730 while the Post-Closure Cost of the South Stack SWMU is estimated at \$5,360,766 for a total of \$12,007,496. Will the 2024 cost estimates include the associated estimates for the approved activities in the most recent permit modification (M-125)? More specifically, will the forthcoming cost estimate include the approved corrective action required for the Olin Ponds which includes:

Condition V.I.1: Remove and treat all Standing Liquids from the Olin Ponds. ~~and~~ B-141R-M-181

and
Condition V.1.2: Removal and Disposal of sediments from the Olin Ponds; Excavation/Remediation Impacted Underlying Soils; and Removal of Treatment Plant Piping; and Sampling of Sediment.

4" 1500' PIPE 10' DIAM

- B. On the next cost estimate (2024), the yellow highlighted items should be figured with the "number of events" each being 4 (2 events * 2 years).

2 events X 2 years = 4

TABLE 1-2
LARAWAY RECYCLING AND DISPOSAL FACILITY
POST-CLOSURE COST ESTIMATE

ITEM DESCRIPTION	ASSUMPTIONS & COMMENTS	UNIT	UNIT RATE	NUMBER OF UNITS PER EVENT	NO. OF
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	
Mow & fertilize vegetative cover	fertilize as needed, mow annual	Per Acre	\$40	55	
Redress final cover (minor grading & vegetation)	Two acres every five years	Per Acre	\$1,800	2	
Inspect cover, runoff systems	4 times/year	Per Inspection	\$500	4	
Inspect Gas & Leachate Systems	4 times/year	Per Inspection	\$500	4	
Inspect emergency/safety equipment	4 times/year	Per Inspection	\$250	4	
Inspect Fence & Gates & Benchmark	4 times/year	Per Inspection	\$500	4	
GROUNDWATER SAMPLING & ANALYSIS (2)					
Analytical Costs Observation wells	10 wells Semi-Ann. Lists	Per Sample	\$528	10	
Analytical Costs GMIZ wells	27 wells Semi-Ann. Lists	Per Sample	\$536	27	
Sampling costs (includes elevation only wells)	40 wells for entire yearly program	Per Sample	\$431	40	
LEACHATE SAMPLING, ANALYSIS & DISPOSAL					
Sampling & Analysis - every year	Full Appendix I list (4 samples/yr)	Per Event	\$1,350	4	
Monthly level monitoring	DTMs and leachate wells (28 points/month)	Per Sample	\$25	28	
Leachate Management - O&M	Utilities, labor, and materials	Per Year	\$35,000	1	
Transportation & Disposal	260 loads/yr @ 4500 gallons/load	Per Gallon	\$0.17	1,170,000	
GROUNDWATER EXTRACTION SYSTEM					
Groundwater Extraction System O&M	Utilities, labor, and materials	Per Year	\$50,000	1	
REPORT SUBMITTALS/CERTIFICATIONS					
Misc. reporting	groundwater, RCRA, leachate	Per Year	\$15,000	1	
Post-closure certification	at end of post-closure period	One time	\$5,000	1	
Decommission Groundwater Wells (40 wells)	at end of post-closure period	One time	\$20,000	1	
TOTAL POST-CLOSURE COST					
2010 thru 2022 CPI increases of 1.2%, 2.1%, 1.8%, 1.5%, 1.4%, 1%, 1.3%, 1.7%, 2.3%, 1.8%, 1.2%, 4.13%, 7.5%					

NOTES

- (1) Per Permit Log No. B-141R, post-closure to continue until 9/10/2027, or 34 years. However, costs are provided through end of 2024
- (2) Includes sampling, evaluation, development of contour maps

- C. Please provide access to a digital copy of the permit renewal application, Log No. B-141R2. [?] PROVIDE A LINK TO KEVIN LOSKO
- D. Does Waste Management of Illinois have a particular date when they anticipate submitting the 2024 Cost Estimate to the Illinois EPA?

Thank You,

John Roop, P.E.
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