

EXHIBIT L



WASTE MANAGEMENT

29755 S Prairie View Drive
Wilmington, IL 60481
815 423 5120
815 423 5920 Fax

May 20, 2020

Mr. Kenneth Smith, 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 Mr. Smith:

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, and 3) update the closure/post-closure plans and cost estimates for the solid waste expansion 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;
7. Section 39(i) Certification.

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 2019 CPI of 1.8%. 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 2019 CPI of 1.8 %. The south stack top slope sedimentation basin, 104 acres of geomembrane cap, south stack grading, perimeter toe drain, forcemain, wet well/lift station 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 1.8%. 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 and portions of Phases 10 through 14 are in place. The site anticipates submitting the portion of Phases 12/13/14 liner certification report 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.***

In accordance with 35 IAC 703.281, the facility will provide written notification of this permit modification to all persons on the facility's mailing list within 90 days of approval by the Agency. As required, the original and three copies of this application are enclosed. If you have any questions or require additional information, please contact me immediately at 815-280-6301.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. {35 IAC 702.126(d)}

Sincerely,
WASTE MANAGEMENT OF ILLINOIS, INC.



Ian C. Johnson, P.E.
Environmental Engineer

xc: Dean Olson

**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	3	\$60,000
Mow & fertilize vegetative cover	fertilize as needed, mow annual	Per Acre	\$40	55	3	\$6,600
Redress final cover (minor grading & vegetation)	Two acres every five years	Per Acre	\$1,800	2	1	\$3,600
Inspect cover, runoff/runoff systems	4 times/year	Per Inspection	\$500	4	3	\$6,000
Inspect Gas & Leachate Systems	4 times/year	Per Inspection	\$500	4	3	\$6,000
Inspect emergency/safety equipment	4 times/year	Per Inspection	\$250	4	3	\$3,000
Inspect Fence & Gates & Benchmark	4 times/year	Per Inspection	\$500	4	3	\$6,000
GROUNDWATER SAMPLING & ANALYSIS (2)						
Analytical Costs Observation wells	10 wells Semi-Ann. Lists	Per Sample	\$528	10	3	\$15,840
Analytical Costs GMZ wells	27 wells Semi-Ann. Lists	Per Sample	\$536	27	3	\$43,416
Sampling costs (includes elevation only wells)	40 wells for entire yearly program	Per Sample	\$431	40	3	\$51,720
LEACHATE SAMPLING, ANALYSIS & DISPOSAL						
Sampling & Analysis - every year	Full Appendix I list (4 samples/yr)	Per Event	\$1,350	4	3	\$16,200
Monthly level monitoring	DTMs and leachate wells(28 points/month)	Per Sample	\$25	28	36	\$25,200
Leachate Management - O&M	Utilities, labor, and materials	Per Year	\$35,000	1	3	\$105,000
Transportation & Disposal	260 loads/yr @ 4500 gallons/load	Per Gallon	\$0.17	1,170,000	3	\$596,700
GROUNDWATER EXTRACTION SYSTEM						
Groundwater Extraction System O&M	Utilities, labor, and materials	Per Year	\$50,000	1	3	\$150,000
REPORT SUBMITTALS/CERTIFICATIONS						
Misc. reporting	groundwater, RCRA, leachate	Per Year	\$15,000	1	3	\$45,000
Post-closure certification	at end of post-closure period	One time	\$5,000	1	1	\$5,000
TOTAL POST-CLOSURE COST						\$1,145,276
2010 thru 2019 CPI increases of 1.2%, 2.1%, 1.8%, 1.5%, 1.4%, 1%, 1.3%, 1.7%, 2.3%, 1.8%						\$1,343,518

NOTES:

(1) Per Permit Log No. B-141R, post -closure to continue until 9/10/2022, or 34 years.

(2) Includes sampling, evaluation, development of contour maps.

ATTACHMENT 2

UPDATED CORRECTIVE ACTION CLOSURE PLAN



WASTE MANAGEMENT

29755 S Prairie View Drive
Wilmington, IL 60481
815 423 5120
815 423 5920 Fax

December 14, 2020

Mr. Kenneth Smith, 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
Pending Class 1* Permit Modification (M-150)

Dear Mr. Smith:

This letter and its attachments are being submitted as additional information per e-mail correspondence received from Mr. Wagner and Ms. Dimayuga regarding cost estimates for well abandonments for pending application M-150.

Groundwater Well Abandonment after Post Closure

Costs for the abandonment of groundwater monitoring wells after post closure have been added for the closed RCRA unit, Corrective action units, and existing solid waste unit. There is some overlap between the monitoring programs where some RCRA wells and SWU wells may be in both monitoring programs. Similarly, there are some stack wells that are included in the RCRA monitoring programs. However, costs are only included for decommissioning of each well regardless if it is monitored as part of multiple programs. Table I-2 (RCRA unit), Table 11-2 (Corrective Action Units), and Tables 13-2 and 13-3 (SWU) have been revised to include decommissioning of groundwater wells.

If approved, please replace the existing Tables I-2, 11-2, 13-2 and 13-3 from May 2020 and replace with the December 2020 tables.

As required, the original and three copies of this application are enclosed. If you have any questions or require additional information, please contact me immediately at 815-280-6301.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. [35 IAC 702.126(d)]

Sincerely,
WASTE MANAGEMENT OF ILLINOIS, INC.

A handwritten signature in black ink, appearing to read "Ian C. Johnson". The signature is fluid and cursive, with a large initial "I" and "J".

Ian C. Johnson, P.E.
Environmental Engineer

xc: Dean Olson

**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	3	\$60,000
Mow & fertilize vegetative cover	fertilize as needed, mow annual	Per Acre	\$40	55	3	\$6,600
Redress final cover (minor grading & vegetation)	Two acres every five years	Per Acre	\$1,800	2	1	\$3,600
Inspect cover, runoff/runoff systems	4 times/year	Per Inspection	\$500	4	3	\$6,000
Inspect Gas & Leachate Systems	4 times/year	Per Inspection	\$500	4	3	\$6,000
Inspect emergency/safety equipment	4 times/year	Per Inspection	\$250	4	3	\$3,000
Inspect Fence & Gates & Benchmark	4 times/year	Per Inspection	\$500	4	3	\$6,000
GROUNDWATER SAMPLING & ANALYSIS (2)						
Analytical Costs Observation wells	10 wells Semi-Ann. Lists	Per Sample	\$528	10	3	\$15,840
Analytical Costs GMZ wells	27 wells Semi-Ann. Lists	Per Sample	\$536	27	3	\$43,416
Sampling costs (includes elevation only wells)	40 wells for entire yearly program	Per Sample	\$431	40	3	\$51,720
LEACHATE SAMPLING, ANALYSIS & DISPOSAL						
Sampling & Analysis - every year	Full Appendix I list (4 samples/yr)	Per Event	\$1,350	4	3	\$16,200
Monthly level monitoring	DTMs and leachate wells(28 points/month)	Per Sample	\$25	28	36	\$25,200
Leachate Management - O&M	Utilities, labor, and materials	Per Year	\$35,000	1	3	\$105,000
Transportation & Disposal	260 loads/yr @ 4500 gallons/load	Per Gallon	\$0.17	1,170,000	3	\$596,700
GROUNDWATER EXTRACTION SYSTEM						
Groundwater Extraction System O&M	Utilities, labor, and materials	Per Year	\$50,000	1	3	\$150,000
REPORT SUBMITTALS/CERTIFICATIONS						
Misc. reporting	groundwater, RCRA, leachate	Per Year	\$15,000	1	3	\$45,000
Post-closure certification	at end of post-closure period	One time	\$5,000	1	1	\$5,000
Decommission Groundwater Wells (40 wells)	at end of post-closure period	One time	\$20,000	1	1	\$20,000
TOTAL POST-CLOSURE COST						\$1,165,276
2010 thru 2019 CPI increases of 1.2%, 2.1%, 1.8%, 1.5%, 1.4%, 1%, 1.3%, 1.7%, 2.3%, 1.8%						\$1,366,980

NOTES:

(1) Per Permit Log No. B-141R, post -closure to continue until 9/10/2022, or 34 years.

(2) Includes sampling, evaluation, development of contour maps.

TABLE 11-2
COST ESTIMATE FOR POST-CLOSURE CARE SOUTH STACK SWMU

For Post-Closure Care: Annual Cost for Years 1 through 30:			
Item	Quantity	Unit Cost	Approximate Annual Cost
1. Site Inspections (20 hours/quarter)	80 hours	\$50.00	\$4,000
2. Final Cover Maintenance (2 acres at 1-foot)	3,226 cy	\$5.50	\$17,750
3. Vegetation Maintenance ¹ - Mowing/Controlled Burn (estimated annualized unit cost)	200 acres	\$33.00	\$6,600
4. Vegetation Repair	3.3 acres	\$1,850.00	\$6,100
5. Miscellaneous Repairs	Lump Sum	--	\$20,000
6. Stack Seepage Collection System Maintenance			
a. Labor (10 hours/week) x (52 weeks/year)	520 hours	\$45.00	\$23,400
b. Pump replacement (estimated annualized cost)	Lump sum	--	\$20,000
c. Miscellaneous repairs	Lump sum	--	\$5,000
7. Groundwater Semi-Annual Sampling ² (Both Stacks) (29 hours/event) x (2 events)	58 hours	\$100.00	\$5,800
8. Groundwater Semi-Annual Monitoring - South Stack (12 wells/event) x (2 events)	24 samples	\$300.00	\$7,200
9. Groundwater Semi-Annual Monitoring - North Stack (7 wells/event) x (2 events)	14 samples	\$481.00	\$6,734
10. Semi-Annual Groundwater Data Review and Report (14 hrs/event) x (2 events)	28 hours	\$80.00	\$2,240
11. Groundwater Monitoring Well Replacement (annualized lump sum cost)	Lump sum	--	\$2,000
12. Annual Report Preparation	80 hours	\$80.00	\$6,400
Total Annual Cost			\$133,224
Updated Annual Cost with 2009 through 2019 Inflation factors of 1.2%,1.2%,2.1%,1.8%,1.5%,1.4%,1%,1.3%,1.7%, 2.3%, 1.8%			\$165,282
30-YEAR COST			<u>\$4,744,770</u>
13. Decommission 19 groundwater wells at end of PC	each	\$500	\$9500
GRAND TOTAL POST CLOSURE COST			\$4,754,270
NOTES:			
¹ Vegetation maintenance including mowing and controlled burning will be performed on the entire landform. ² Groundwater monitoring performed on a semi-annual basis; cost includes two-man sampling crew.			

TABLE 13-2
LARAWAY RECYCLING AND DISPOSAL FACILITY
CURRENT OPERATIONAL AREAS POST-CLOSURE CARE COST ESTIMATE

Description	Quantity	Unit	Quantity	Unit	2019 Unit Price	Inflation (%)	2020 Unit Price	Annual Cost (2020)	30 Year Cost
1. Site Inspection and Documentation	3	hours	4	quarters	\$58.32	1.80	\$59.37	\$713	\$21,390
2. Final Cover Maintenance (0.33 acres @ 1')	550	cubic yards	-	-	\$6.41	1.80	\$6.53	\$3,589	\$107,670
3. Vegetation Maintenance/Mowing	168.80	acres	-	-	\$54.78	1.80	\$55.77	\$9,414	\$282,420
4. Vegetation Repair	0.66	acres	-	-	\$1,924.22	1.80	\$1,958.86	\$1,293	\$38,790
5. Miscellaneous Repairs	1	lump sum	-	-	\$1,166.19	1.80	\$1,187.18	\$1,188	\$35,640
6. Leachate Transportation and Disposal (4.2 gal/ac/day)	709.00	gallons/day	365	days	\$0.117	1.80	\$0.119	\$30,823	\$924,690
7. Leachate Collection System Maintenance									
a. Labor	4	hours	52	weeks	\$40.82	1.80	\$41.55	\$8,644	\$259,320
b. Cleaning of leachate collection pipe	12,800	linear feet	-	-	\$0.60	1.80	\$0.61	\$7,819	\$234,570
8. Leachate Monitoring (Analysis and Sampling)									
List L1: 4 samples x 2 events	4	samples	2	events	\$787.07	1.80	\$801.24	\$6,410	\$192,300
List L2: 1 samples/year	1	samples	1	year	\$676.37	1.80	\$688.54	\$689	\$20,670
9. Groundwater & Leachate Sampling and Level Measurements	26	hours	4	events	\$158.08	1.80	\$160.93	\$16,737	\$502,110
10. a. Groundwater Monitoring List G2 semi-annual wells	10	wells	2	events	\$125.42	1.80	\$127.68	\$2,554	\$76,620
b. Groundwater Monitoring List G1 semi-annual wells	10	wells	2	events	\$121.21	1.80	\$123.39	\$2,468	\$74,040
11. a. Groundwater Monitoring List G2 quarterly wells	28	wells	4	events	\$125.42	1.80	\$127.68	\$14,300	\$429,000
b. Groundwater Monitoring List G1 quarterly wells	28	wells	4	events	\$121.21	1.80	\$123.39	\$13,820	\$414,600
12. Groundwater Data Review	12	hours	4	events	\$58.32	1.80	\$59.37	\$2,850	\$85,500
13. Gas Monitoring/Sampling									
a. Labor	26	hours	1	year	\$40.82	1.80	\$41.55	\$1,081	\$32,430
b. Gas probe analysis	28	samples	4	year	\$40.82	1.80	\$41.55	\$4,655	\$139,650
c. Ambient air monitoring	4	samples	4	year	\$40.82	1.80	\$41.55	\$665	\$19,950
14. Preparation of Annual Reports/Certification of Completion	8	hours	4	quarters	\$93.30	1.80	\$94.98	\$3,040	\$91,200
15. Decommission Groundwater wells	39	wells	1	one time	\$491.16	1.80	\$500.00	\$19,501	\$19,501
							Total		\$4,002,061

Notes

1. Routine leachate monitoring performed on a semi-annual basis.
2. Lists L1 and L2 provided in Permit No. B-141R.

TABLE 13-3

**LARAWAY RECYCLING AND DISPOSAL FACILITY
SUMMARY OF COST ESTIMATES FOR WHICH FINANCIAL ASSURANCE IS REQUIRED**

1. Current Operating Areas Closure	\$7,997,135
2. Current Operating Areas Post-Closure	\$4,002,061
Total	\$11,999,196

Revised December 2020