

EXHIBIT N



WASTE MANAGEMENT
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May 9, 2022

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, 3) update the closure/post-closure plans and cost estimates for the solid waste expansion, and 4) fix a typographical error in the permit. 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 2021 CPI of 4.13%. Post-closure costs have been estimated until September 2023. 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 2021 CPI of 4.13 %. 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 4.13%. 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. 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.*

Permit Typographical Error

On April 15, 2022, a revision to the Laraway RCRA Post-Closure permit was issued (Log #B-141R-M-161 & M-162). Attachment A to the permit indicated that for Log No. B-141R-M-161, Condition IV.24 had been removed. Per communications with the Agency, the information from this permit condition was to be transferred to Condition IV.17. The information transferred to Condition IV.17, omitted the language in bold italics noted below:

“In the event of a confirmed significant change in groundwater quality due to the facility has occurred, the groundwater monitoring at the affected monitoring well will immediately return to quarterly monitoring...”

As the Agency has indicted that this was an omission on their part, we are requesting to modify the permit to add this language back into the permit. Condition IV.17 of the permit would need to be modified upon approval of this request. There are no changes to the permit application required.

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.

ATTACHMENT 1

UPDATED RCRA POST-CLOSURE COST ESTIMATES

**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	2	\$40,000
Mow & fertilize vegetative cover	fertilize as needed, mow annual	Per Acre	\$40	55	2	\$4,400
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	2	\$4,000
Inspect Gas & Leachate Systems	4 times/year	Per Inspection	\$500	4	2	\$4,000
Inspect emergency/safety equipment	4 times/year	Per Inspection	\$250	4	2	\$2,000
Inspect Fence & Gates & Benchmark	4 times/year	Per Inspection	\$500	4	2	\$4,000
GROUNDWATER SAMPLING & ANALYSIS (2)						
Analytical Costs Observation wells	10 wells Semi-Ann. Lists	Per Sample	\$528	10	2	\$10,560
Analytical Costs GMZ wells	27 wells Semi-Ann. Lists	Per Sample	\$536	27	2	\$28,944
Sampling costs (includes elevation only wells)	40 wells for entire yearly program	Per Sample	\$431	40	2	\$34,480
LEACHATE SAMPLING, ANALYSIS & DISPOSAL						
Sampling & Analysis - every year	Full Appendix I list (4 samples/yr)	Per Event	\$1,350	4	2	\$10,800
Monthly level monitoring	DTMs and leachate wells(28 points/month)	Per Sample	\$25	28	24	\$16,800
Leachate Management - O&M	Utilities, labor, and materials	Per Year	\$35,000	1	2	\$70,000
Transportation & Disposal	260 loads/yr @ 4500 gallons/load	Per Gallon	\$0.17	1,170,000	2	\$397,800
GROUNDWATER EXTRACTION SYSTEM						
Groundwater Extraction System O&M	Utilities, labor, and materials	Per Year	\$50,000	1	2	\$100,000
REPORT SUBMITTALS/CERTIFICATIONS						
Misc. reporting	groundwater, RCRA, leachate	Per Year	\$15,000	1	2	\$30,000
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						\$786,384
2010 thru 2021 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%						\$972,130

NOTES:

(1) Per Permit Log No. B-141R, post -closure to continue until 9/10/2022, or 34 years. However, costs are provided through end of 2023.

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