

# **EXHIBIT O**



**Prairie View**  
29755 S Prairie View Drive  
Wilmington, IL 60481

May 12, 2023

Ms. Jacki Cooperider, 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. Cooperider:

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. 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 2022 CPI of 7.0%. Post-closure costs have been estimated until September 2024. 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 2022 CPI of 7.0 %. 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.***

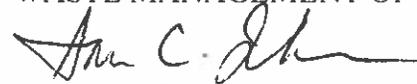
### Updated Solid Waste Unit Closure/Post-Closure Plans

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 7.0%. 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 9 and portions of Phases 10 through 14 are in place (9.2 acres of Phases 9/10 will be constructed in 2023). 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: Dave Hartke

**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
<b>GENERAL MAINTENANCE &amp; INSPECTIONS</b>						
General maintenance of RCRA Unit (all O&M efforts except for specific line items below)	Utilities, labor, and materials	Per Year	\$20,000	1	1	\$20,000
Mow & fertilize vegetative cover	fertilize as needed, mow annual	Per Acre	\$40	55	1	\$2,200
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	1	\$2,000
Inspect Gas & Leachate Systems	4 times/year	Per Inspection	\$500	4	1	\$2,000
Inspect emergency/safety equipment	4 times/year	Per Inspection	\$250	4	1	\$1,000
Inspect Fence & Gates & Benchmark	4 times/year	Per Inspection	\$500	4	1	\$2,000
<b>GROUNDWATER SAMPLING &amp; ANALYSIS (2)</b>						
Analytical Costs Observation wells	10 wells Semi-Ann. Lists	Per Sample	\$528	10	1	\$5,280
Analytical Costs GMZ wells	27 wells Semi-Ann. Lists	Per Sample	\$536	27	1	\$14,472
Sampling costs (includes elevation only wells)	40 wells for entire yearly program	Per Sample	\$431	40	1	\$17,240
<b>LEACHATE SAMPLING, ANALYSIS &amp; DISPOSAL</b>						
Sampling & Analysis - every year	Full Appendix I list (4 samples/yr)	Per Event	\$1,350	4	1	\$5,400
Monthly level monitoring	DTMs and leachate wells(28 points/month)	Per Sample	\$25	28	12	\$8,400
Leachate Management - O&M	Utilities, labor, and materials	Per Year	\$35,000	1	1	\$35,000
Transportation & Disposal	260 loads/yr @ 4500 gallons/load	Per Gallon	\$0.17	1,170,000	1	\$198,900
<b>GROUNDWATER EXTRACTION SYSTEM</b>						
Groundwater Extraction System O&M	Utilities, labor, and materials	Per Year	\$50,000	1	1	\$50,000
<b>REPORT SUBMITTALS/CERTIFICATIONS</b>						
Misc. reporting	groundwater, RCRA, leachate	Per Year	\$15,000	1	1	\$15,000
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
<b>TOTAL POST-CLOSURE COST</b>						\$407,492
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%						<b>\$539,005</b>

## 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 2024.  
(2) Includes sampling, evaluation, development of contour maps.

ATTACHMENT 2

UPDATED CORRECTIVE ACTION CLOSURE PLAN