From: John Lindsey
To: Roles, Gary W. [US-US]
Subject: RE: EXTERNAL: ECDC and La Paz Information
Date: Monday, January 08, 2018 5:59:26 PM
Attachments: La Paz RFQ Volume Info.PDF

Gary, Here are two documents that are more current. There is really not a lot of documentation that addresses the current capacity issues at the La Paz County Landfill. Not a tremendous amount of disposal of MSW or soils occurs on a daily, monthly or yearly basis that would or has impacted the disposal capacity of the facility.

1. In 2012, the County of La Paz put out a Request for Proposal for the operation of the Landfill. I am sending you the parts of the Proposal that references the Landfills background, airspace, volume of wastes accepted and site permit information covered on pages 8, 9, 10, 11 and 12 of the document. If you would like to have the entire document to substantiate this information just let me know.

Republic Services was selected as the operator of the La Paz County Landfill and I believe that this Operator Agreement between the County of La Paz and Republic Services runs through 2022. I am not entirely sure about this term and can find out more if you request it.

John Lindsey
John Lindsey
Waste By Rail
1111 "A" Quail Street
Newport Beach, CA 92660
[redacted]
(949) 673-1247 Office
(949) 673-0846 Fa
[redacted]

From: Roles, Gary W. [redacted]
Sent: Friday, January 5, 2018 10:57 AM
To: John Lindsey [redacted]
Subject: RE: EXTERNAL: ECDC and La Paz Information

Great and back at ya.

From: John Lindsey [redacted]
Sent: Friday, January 05, 2018 1:56 PM
To: Roles, Gary W. [US-US]
Subject: RE: EXTERNAL: ECDC and La Paz Information

Gary, I have some more current information for La Pax but not much has changed volume wise. If you. Subtracted 2,000,000 yards from the 25, 000,000 total you would be very close to today's capacity. The facility's permit allows for an additional expansion onto BLM land adjacent to the landfill.

I will send you more info on Monday.

Happy New Year

John

Sent from my Sprint Samsung Galaxy S7 edge.

-------- Original message --------
From: "Roles, Gary W." [redacted]
Date: 1/5/18 10:42 AM (GMT-08:00)
To: John Lindsey [redacted]
Subject: RE: EXTERNAL: ECDC and La Paz Information

Thank you.

Would you happen to have any later information about available disposal capacity at La Paz? The information that you sent (much appreciated) indicated 25,400,000 cubic yards of remaining disposal capacity as of 12/31/2001. This date is about 16 years old.

Regards.

Gary

From: John Lindsey [redacted]
Sent: Tuesday, November 14, 2017 3:45 PM
To: Roles, Gary W. [US-US]
Cc: 'Hays, Fred'
Subject: EXTERNAL: ECDC and La Paz Information

Gary, Here is the information that you requested on both The ECDC and La Paz County Landfills. Should you need additional information on the facilities, just let me know. I have also included some information on the environmental benefits of shipping by rail versus by truck. The primary example is based on a shipment from the Port of Long Beach to ECDC. The rail miles are very similar and as you can see, the emission reduction is very significant.

I am available to assist you at your convenience.

John Lindsey

John Lindsey
Waste By Rail
1111 "A" Quail Street
Newport Beach, CA 92660
[redacted]
(949) 673-1247 Office
(949) 673-0846 Fax
[redacted]

THE ECDC LANDFILL

1111 West Highway 123
East Carbon, Utah 84520

OWNED AND OPERATED BY REPUBLIC SERVICES

ECDC Environmental Introduction

East Carbon Development Corporation, later named ECDC Environmental LLC was formed in 1989 to plan, develop and operate a State-of-the-Art disposal facility that is served by the nation's vast railroad network. After numerous public hearings and detailed compliance procedures, ECDC received all necessary licenses and permits to begin construction in February of 1992. By August of that same year the initial cell was completed and rail cars began arriving at ECDC's 2400 acre site. The entire site was permitted with the enormous capacity of 300 million cubic yards.

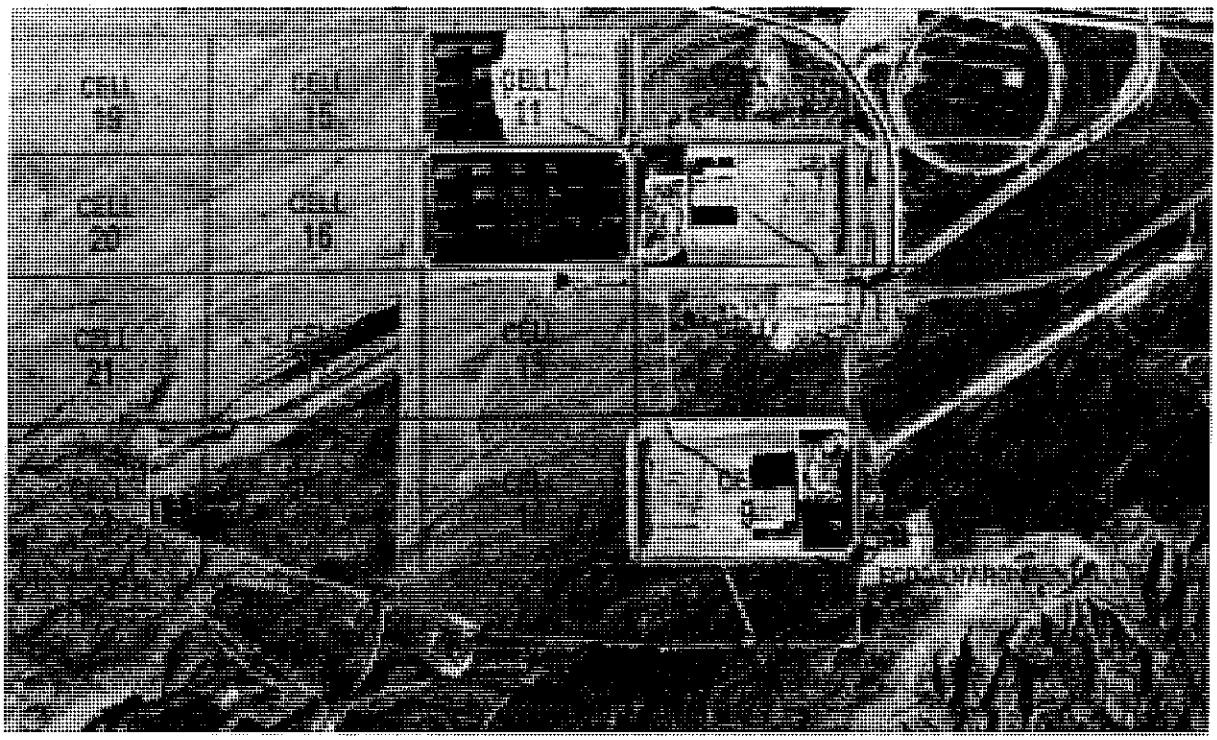
The facility is located east of US 6 on Highway 123, about 140 miles southeast of Salt Lake City. The entire 2400 acre facility is within the city limits of East Carbon, Utah.

ECDC Environmental LLC. is owned by Republic Waste Services, the second largest waste company in the United States with current gross annual revenue in excess of 8 billion dollars. The relationship provides ECDC with substantial and stable financial resources to be able to take on large volume projects that require support from Republic's extensive environmental organization. In addition, personnel in ECDC's regional offices are experienced in obtaining any additional permits needed on a project by project basis for a variety of requirements that may assist transportation operations by the nation's railroads.

Community support has played a major role in ECDC's success since 1992. The facility pays host fees to the town of East Carbon and to Carbon County, Utah. Funds generated by landfill operations and disposal fees have provided resources for local schools and a variety of community services that were previously unsupported. Perhaps most importantly the facility is seen as a stable, long term employment opportunity for area residents and a source of substantial support for a region that has been challenged by the decline of coal mining employment for the past 15 years.

Site Layout

ECDC is a landfill that is divided into secure cells. A cell has a minimum capacity of approximately 2 million cubic yards, and up to a Super Cell size of up to 30 million cubic yards. The interior of each cell is excavated to a depth of 20 feet and the excavated material is used to construct a 40 foot high berm around the perimeter. Thus each cell has a depth of 60 feet, allowing it to contain a predetermined quantity of material.



Aerial View of Potential Cell Locations

East Carbon's dry desert climate is ideal for a landfill. With an average of only 11 inches per year of precipitation, moisture in the area evaporates at an average rate of 47 inches per year.

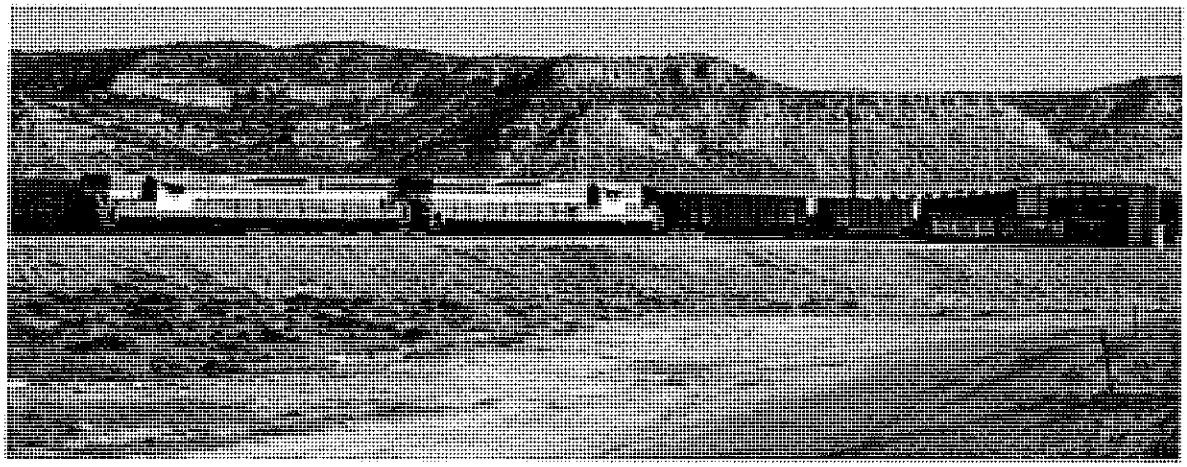
The facility has a 20,000 ft. Union Pacific Railroad served spur that leads directly in to the 10 miles of ECDC storage track that is ideal for unit train turnaround and storage of empty rail cars.

The ECDC track layout is a critical component for efficient high volume processing of large disposal projects that require rapid turnaround times to maintain rigorous cost effective schedules. All operations are performed within the permitted facilities 2400 acres.

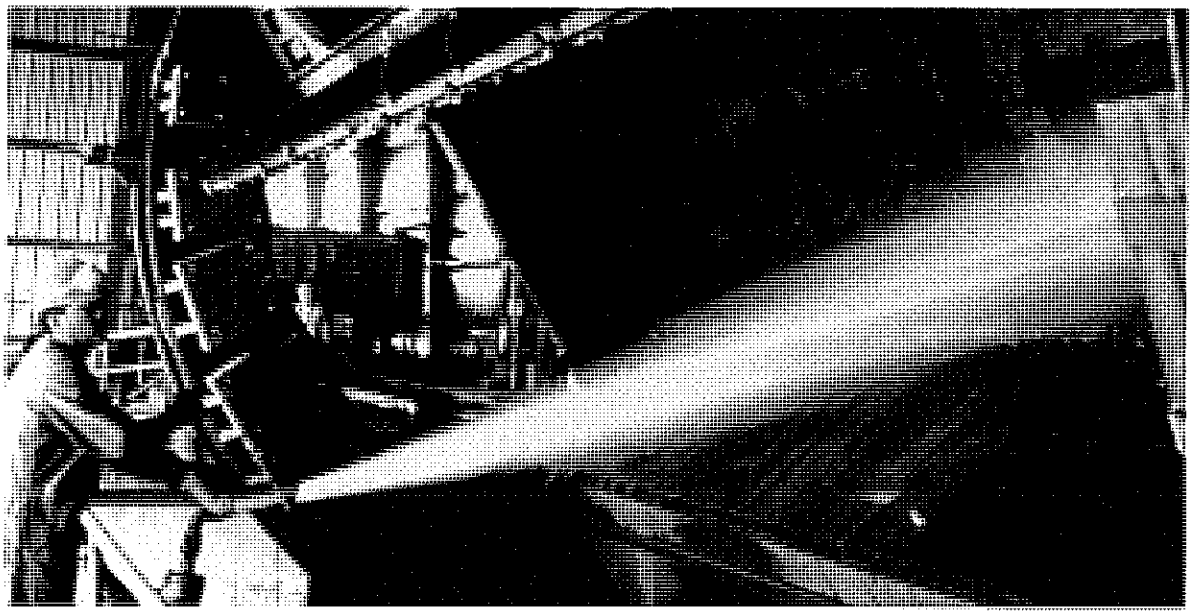
Railcar Unloading Facilities

A central feature of the ECDC Environmental landfill is the modern and highly efficient rotary unloading facility. Open top railcars are routed onto a 4800-foot circular track feeds the railcars through a 280 ft. pre heat building that will thaw winter loads if needed, and also provides protection from hostile climate days. This building leads to the rotary car unloader. Unit train railcars are uncoupled and the rotary un-

loader lifts and rotates each car rapidly to empty the cars payload onto the tipping floor below. The rotary is housed in a 13,000 sq ft. building complete with dust suppression, monitoring as required, and a railcar scale for accurate payload weights. During the unloading process and while the railcar is inverted, high pressure water cannons are utilized to remove any residual material that adheres to the rail cars surface. One shift of approximately 8-10 hours can unload 40 to 50 cars. Thus a double shift can effectively unload a unit train of 80 cars per 24 hour period.



Locomotives push railcars into the rotary car un-loader



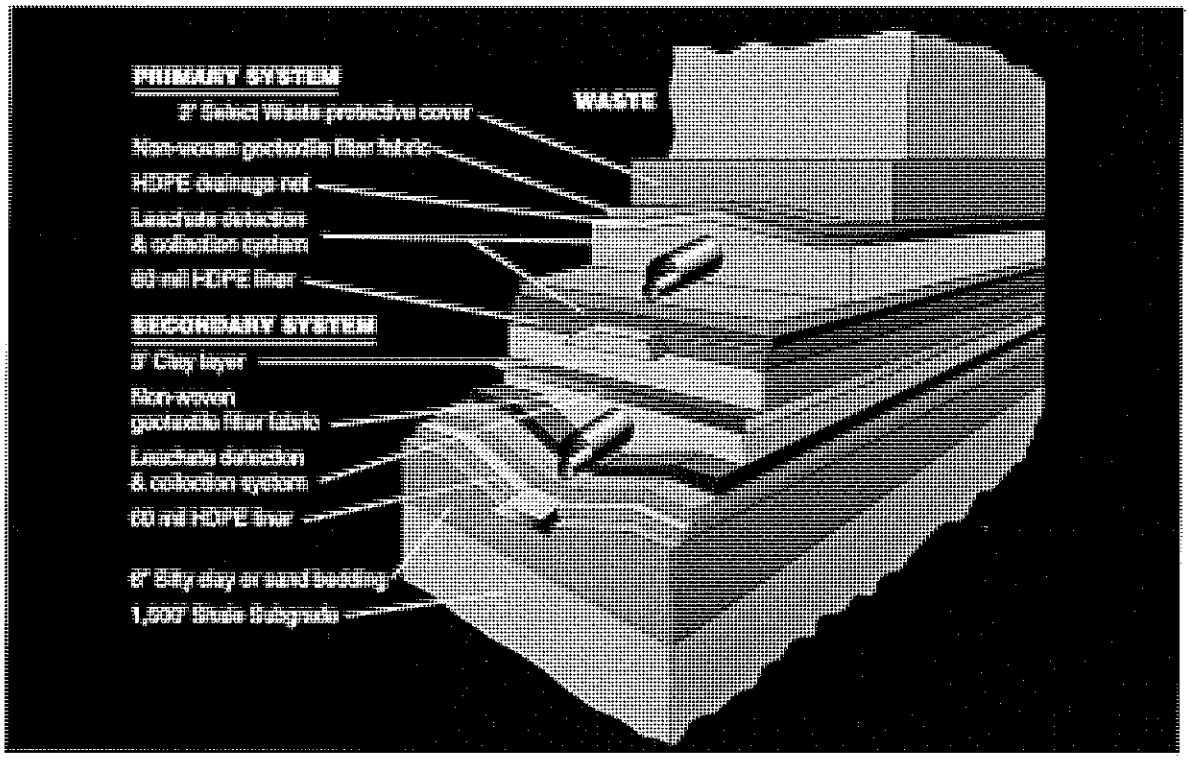
Gondola being cleaned while inverted in the rotary rail car un-loader

After the unloading process is completed the empty rail cars exit the building and then cars are inspected. If any additional residual is found, the car will be rewashed in the rotary dumper a second time prior to being released back to service.

Cell Design and Construction

Each cell's interior is lined with five and one-half feet of natural and man-made materials to create an impervious barrier that far exceeds subtitle "D" requirements. This includes 3 ft. of compacted clay, separating two high density polyethylene liners are installed beneath the waste layers of each cell. The liners are installed along with geotextile fabrics and additional drainage net. Additionally the liners are protected by two feet of specially selected material that has been screened. Each landfill cell is equipped with a leachate collection and leak detection systems. Additionally, complete background monitoring well systems were installed during initial construction in 1990. Gas monitoring is conducted at the site on a scheduled basis.

In addition to the environmental protection of the cell engineering and construction, the entire site is located above a 'nature provided 1500 ft layer of clay like shale, titled the "Mancos Shale".



Section view of cell design.

After a cell is filled to capacity, it will be capped with the required engineered polyethylene liner cover and an additional two feet of native soil. ECDC's staff engineers work closely with Utah wildlife experts to develop plans for re-vegetation with native plants after the closure of each cell.

Rail Access and Capacity

Rail service is the heart of the ECDC Environmental landfill and its primary transportation mode of just about all waste streams shipped to the facility. A 20,000 foot rail spur connects the facility to the Union Pacific main line, one of the major rail road routes in Utah. With more than 300 railcars and 800 bulk intermodal containers ECDC has proven to be America's premier rail served landfill.

ECDC has always performed all of the activities associated with rail haul activities; this has proven to be the best formula for all of our customers. Throughout the disposal process for both large and small projects, ECDC is the single point of contact for all of the following tasks.

- Securing competitive rail rates
- Rail use and access
- Supplying the right railroad equipment
- Timely delivery of empty cars
- Shipping of Loaded Cars
- Correct Manifesting/Bill of Lading Procedures
- Tracking of all cars daily until their arrival/unloading
- Return tracking to destination

ECDC has developed an extensive list of customers that have demanded that their specific needs be met without exception.

Private Single Cell Development

One of the many unique assets of the ECDC facility is the ability to process and accommodate extremely large volumes of waste. ECDC has the capacity to dedicate a cell to a specific generator or one specific high volume project.

As outlined previously, the multiple cell design within the 2400 acre facility allows ECDC to engineer and construct a cell for a dedicated project that insures the waste remain separate from all other waste streams being accepted to the facility. Within the cells engineering, specific areas or sections of the cell could be set aside for additional treatment or segregation of different wastes types from the project.

TSCA Cell Potential for Specific Projects

Currently ECDC Environmental is not permitted to accept TSCA waste RCRA waste. However the prospect of building a dedicated TSCA cell has been discussed in the past.

ECDC requested an approval for accepting PCB containing wastes greater than 50 ppm to the Department of Environmental Quality, and the Division of Solid and Hazardous Waste. ECDC later deferred the approval until a large volume rail haul project or a significant recurrent long term TSCA waste stream could be considered for disposal. One of the key considerations for TSCA waste disposal at the facility would be the volume of material that could be realized under an initial contract. With more than sufficient acreage within the facility to construct a segregated cell for TSCA waste, the dedicated cell could be "customized" for the wastes from the project. ECDC would have to have a minimum contracted amount of waste material to pursue the approvals required for the construction of a separate TSCA cell.

Hudson River Sediment Disposal/Transportation by Rail to ECDC

ECDC is aware of the completion of the Pilot Study and the ongoing project involving General Electric's remediation at the Hudson River PCBs Superfund Site. A significant part of the projects success is dependent on rail transportation for the disposal of the sediments from the project's rail served Sediment Processing Facility.

ECDC currently has the entire specialized rail infrastructure to receive large daily volumes of waste. In addition the facility has sufficient track space to accommodate surges in rail schedules; this asset can play an important role in making up for schedule challenges that may occur. Transportation by rail over long distances often have variances in travel speeds that causes overlaps in the delivery of both empty and loaded rail cars.

Projects with large volumes that the Hudson River will generate, requires these capacities at both origin and destination.

Summary

ECDC's rail experience has led to the development of the facility improvements that can only be designed and implanted from the valuable lessons learned. Experience that can only be acquired from large volume projects that have depended on high volume rail haul for their timely completion

ECDC started out as a vision. A vision that has been developed into a facility that is providing long term secure solutions for large established companies. These companies have based large scale remediation projects on rail transportation, schedules that could not be met utilizing only truck transportation.

The General Electric Hudson River Project could benefit from the development of a dedicated rail served TSCA cell. This cell would be constructed within the ECDC Environmental existing facility, with the total capacity to receive all of the waste sediments from the project by rail. The permitting and construction of such a cell can only be realized with a mutual interest by all involved. Hopefully this brief description of the potential for ECDC Environmental to be part of the Hudson River Project will be the first step in that process.

ECDC Environmental LLC.

TOXICITY *LIMITS*

Accepted Wastes

The ECDC facility may accept solid wastes that pass the Toxicity Characteristic Leaching Procedure (TCLP) test described in 40CFR261.24 with concentrations lower than the limits listed below.

Organics

Material	Regulated Level	Waste No.
Benzene	0.5 mg/l	D018
Carbon Tetrachloride	0.5 mg/l	D019
Chlordane	0.03 mg/l	D020
Chlorobenzene	100.0 mg/l	D021
Chloroform	6.0 mg/l	D022
o-Cresol	200.0 mg/l	D023
m-Cresol	200.0 mg/l	D024
p-Cresol	200.0 mg/l	D025
Cresol	200.0 mg/l	D026
2.4-D	10.0 mg/l	D016
1.4-Dichlorobenzene	7.5 mg/l	D027
Dichloroethane	0.5 mg/l	D028
1.1-Dichloroethylene	0.7 mg/l	D029
2.4-Dinitrotoluene	0.13 mg/l	D030
Endrin	0.2 mg/l	D012
Heptachlor, and its epoxide	0.008 mg/l	D031
Hexachlorobutadiene	0.5 mg/l	D033
Hexachlorobenzene	0.13 mg/ld	D032
Hexachloroethane	3.0 mg/l	D034
Lindane	0.4 mg/l	D013
Methoxychlor	10.0 mg/l	D014
Methyl Ethyl Ketone	200.0mg/l	D035
Nitrobenzene	2.0 mg/l	D036
Pentachlorophenol	100.0 mg/l	D037
Pyridine	5.0 mg/l	D038
Tetrachlorethylene	0.7 mg/l	D039
Toxaphene	0.5 mg/l	D015
Trichloroethylene	0.5 mg/l	D040
2.4.5-Trichlorophenol	400.0 mg/l	D041
2.4.6-Trichlorophenol	2.0 mg/l	D042
2.4.5-TP Silvex	1.0 mg/l	D017
Vinyl Chloride	0.2 mg/l	D043

Metals

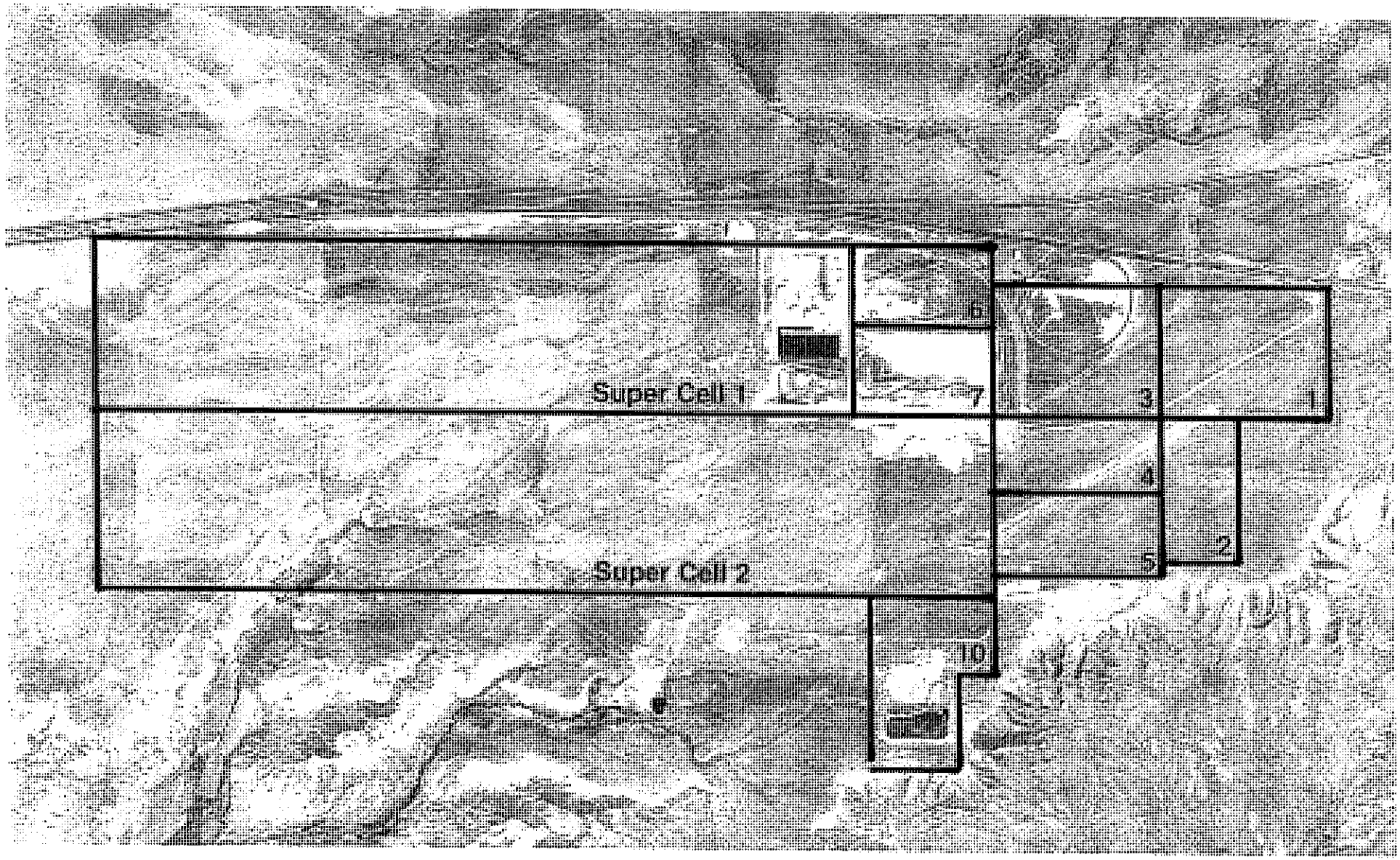
Arsenic as As	5.0 mg/l	D004
Barium as Ba	100.0 mg/l	D005
Cadmium as Cd	1.0 mg/l	D006
Chromium (Total) as Cr	5.0 mg/l	D007
Lead as Pb	5.0 mg/l	D008
Mercury as Hg	0.2 mg/l	D009
Selenium as Se	1.0 mg/l	D010
Silver as Ag	5.0 mg/l	D011

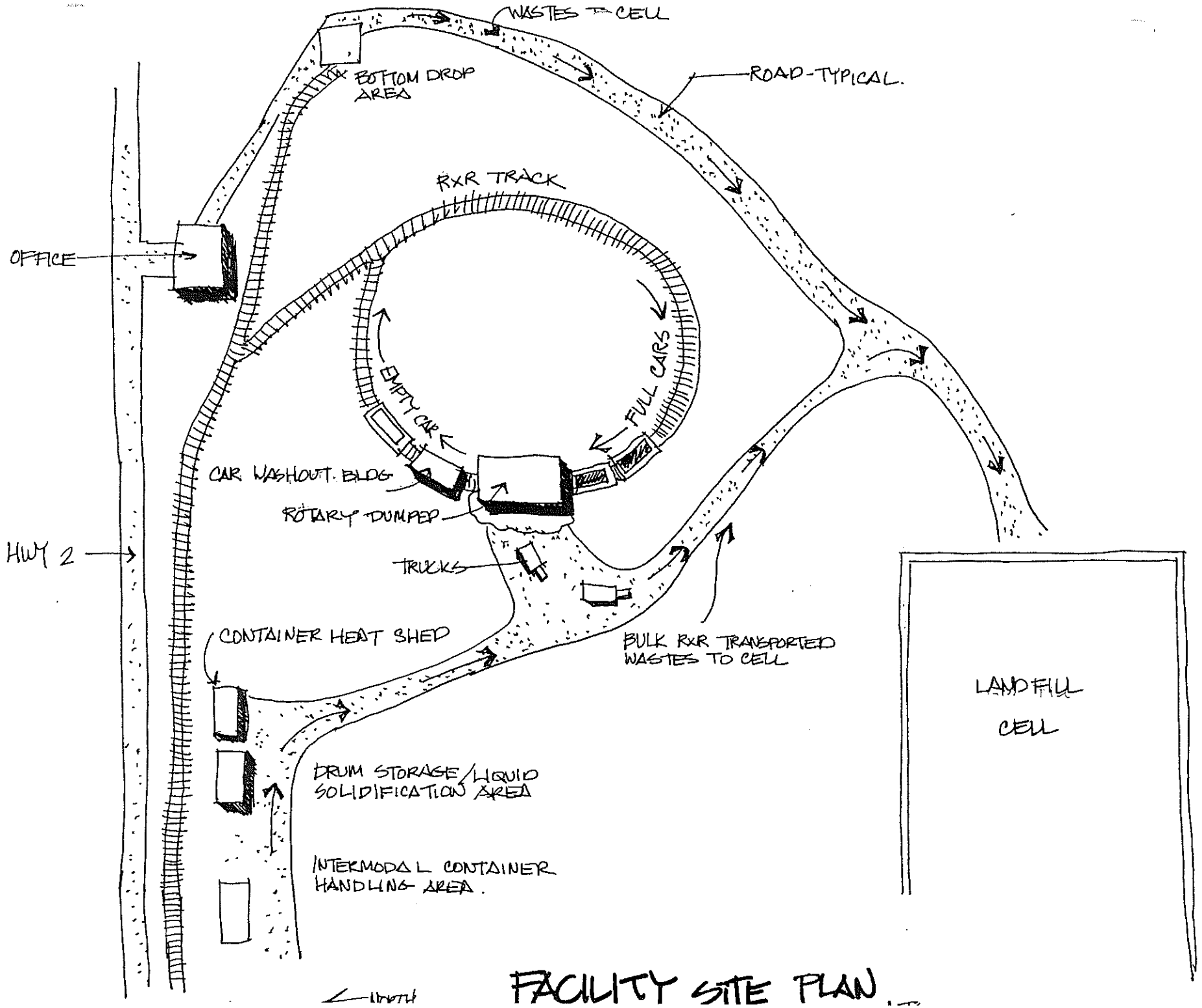
Other Characteristics

The ECDC facility may **not** accept materials that exhibit certain characteristics as generally summarized below. (A detailed description of these characteristics can be found in 40CFR261.21 through 261.23)

Characteristic	Regulated Level	Waste No.
Ignitability	Flash Point < 140°F	D001
Corrosivity	pH ≤ 2 or ≥ 12.5	D002
Reactivity	Cyanide or sulfide bearing, unstable, or reacts violently with water	D003

ECDC ENVIRONMENTAL SITE MAP





FACILITY SITE PLAN

SOLID WASTE PERMIT RENEWAL

ECDC Environmental, L.C.
CLASS V LANDFILL
Permit #9422R1
(Modified 2012 to Accept PCB Wastes)

Pursuant to the provisions of the *Utah Solid and Hazardous Waste Act*, Title 19, Chapter 6, Part 1, Utah Code Annotated (Utah Code Ann. §) 1953, as amended (the Act) and the *Utah Solid Waste Permitting and Management Rules*, Utah Administrative Code (Utah Admin. Code) R315-301 through 320 adopted thereunder,

ECDC Environmental, L.C., as Owner and Operator

is hereby approved to operate the ECDC Class V Landfill located in Township 15 South, Range 13 East, Salt Lake Base and Meridian, Carbon County, Utah and within the city limits of East Carbon City as shown in the permit renewal application that was determined complete on August 31, 2007. A complete legal description of the landfill location is incorporated in the permit application.

The operation of the landfill is subject to the condition that ECDC Environmental, L.C. (Owner and Operator) meet the requirements set forth herein.

All references to Utah Admin. Code R315-301 through 320 are to regulations that are in effect on the date that this permit becomes effective.

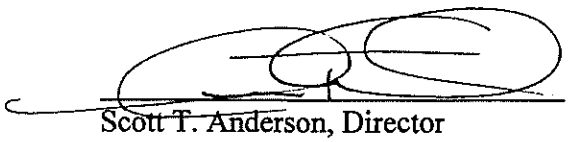
This permit shall become effective November 1, 2007.

This permit shall expire at midnight October 31, 2017.

Closure cost revision date November 1, 2012.

Signed this 1st day of November, 2007

Modified on 13th day of June, 2013



Scott T. Anderson, Director
Utah Division of Solid and Hazardous Waste

The La Paz County Landfill

26999 Highway 95
Parker, Arizona 85344

Owned By The County of La Paz, Arizona

Operated By Republic Services, Inc.

ARIZONA DEPARTMENT
OF
ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.azdeq.gov

Janice K. Brewer
Governor

Henry R. Darwin
Director

May 21, 2014
PRU14-209

Mr. Dan Field
County Administrator
La Paz County
1108 Joshua Street
Parker, AZ 85344

Re: Repeal of Arizona Revised Statutes Section 49-867

Dear Mr. Field:

The Arizona Department of Environmental Quality (ADEQ) received notice that Bill Number HB 2523, repealing Arizona Revised Statutes Section 49-867, passed both the Arizona House of Representatives and the Arizona Senate as well as received approval from the Governor during this legislative session, making it now legal for a facility that is owned by the state, a political subdivision or a municipality to accept for treatment, storage or disposal special waste generated outside this state.

By Arizona State Law, this new law would become effective 90 days after "sine die" (the Legislature adjourning without a day to reconvene). Due to this ninety day requirement, this means that when the Legislature adjourned on Wednesday April 23, 2014, the La Paz County Regional Landfill may begin to receive Petroleum Contaminated Soils and Auto Shredder Fluff from out of state generators starting on July 24, 2014.

Section 3.1(a)(13) of the current landfill permit, *MFPA No. 1500470004*, dated November 26, 2013, includes all applicable rules found in Arizona Administrative Code (AAC) for the manifesting, recordkeeping, and reporting of special waste, making La Paz County Regional Landfill fully permitted to accept this material starting on July 24, 2014.

If you have any questions regarding this letter, please contact me at (602) 771-4136 or toll-free at (800) 234-5677, ext. 771-4136.

Sincerely,

Mike Prigge

Mike Prigge, P.E.
Permits and Plan Review Unit

cc: Brian Conway, Republic Services
Doug Sawyer, Republic Services
Kelly Sarber, Strategic Management Group

AUDIT INFORMATION

Facility Name and Site Address	La Paz County Landfill 26999 Highway 95 Parker, Arizona 85344
Facility Mailing Address	River Cities Waste Services 2011 College Drive Lake Havasu City, Arizona 86403
Facility Telephone & Facsimile Number	(928) 916-1253 (928) 855-5369
Latitude Longitude	33° 56' 37" N 114° 11' 18" W
Section, Township, Range	Section 13, T7N, R19W, GSRB&M
Facility Entrance Elevation	Approximately 868 feet above Mean Sea Level
Facility Operator	BFI Waste Services (dba La Paz County Landfill)
Facility Operator Parent Company	~~Allied Waste Industries, Inc.~~ Republic Services, Inc
Property Owner	La Paz County
Previous Land Owner	Bureau of Land Management
Date Facility Began Operation	1990
Date Current Operator Began Operations	November 1993
Brief Site History	La Paz County operated the facility from 1990 through October 1993. La Paz County entered into a Public/Private Partnership with Browning-Ferris Industries in November 1993.

LA PAZ COUNTY LANDFILL

LA PAZ COUNTY LANDFILL

Information Sheet

Background Information – The La Paz County Landfill Project was formed in the fall of 1993 between La Paz County and Browning-Ferris Industries, Inc. (BFI) after a Request for Proposal process. The County conceived of the partnership as an opportunity to share in revenues generated by a large, regional landfill that would be operated by a reputable, private environmental firm. La Paz County selected BFI and both partners are working together to market the capacity at the landfill to municipal and commercial customers. La Paz County retains ownership of the site and BFI constructed and operates the landfill.

Arizona is a federally certified state for Subtitle D and the landfill design meets or exceeds the current Subtitle D standards. Environmental controls feature a composite leachate collection system. The landfill was fully permitted April, 1994, and can accept municipal solid waste and special waste categories allowed under the Arizona State permit. The landfill opened November 9, 1994 and immediately began receiving 600-800 tons per day, primarily from Southern California. There is no regulatory limit to the number of tons received per day. The site covers 160 acres, with 130 acres permitted for solid waste disposal.

Location – The landfill is located in a western Arizona county that borders Southern California. The La Paz County Landfill is 100 miles north of Yuma, Arizona, and 60 miles south of Lake Havasu City, Arizona. The landfill is located on Highway 95, 18 miles north of Quartzsite, Arizona. Blythe, California, which is next to Quartzsite, is the nearest Southern California community. Due to the isolated location that is geologically suitable for a landfill, the site has limited impacts to residents more than 17 miles away.

Types of Waste Accepted - Municipal solid waste, non-hazardous industrial solid waste, asbestos and asbestos containing material, construction / demolition debris, landscaping, large appliances (recycled), tires, septage (pond), and other special waste categories, non-RCRA California hazardous, industrial solid waste that meet state limits as set by State and Federal Subtitle D regulations.

Waste Approval Requirements - Municipal solid wastes and construction / demolition wastes have no approval requirements. Other wastes will require a completed Waste Profile form and appropriate supporting analytical data for the waste and type of contamination (including the chain of custody).

La Paz County Landfill
Physical Address: 26999 Highway 95, Mile Post 128, Parker, Arizona 85344
Mailing Address: 2011 College Drive, Lake Havasu City, Arizona 86403
Phone: (928) 855-9441 Fax: (928) 855-5369

Landfill Management Staff	General Manager: Brian Conway (928) 855-9441 Site Supervisor: Duane Law (928) 669-4663 Safety Manager: Shawn Nugent (602) 237-2078 Environmental Manager: Greg Czerniski (480) 895-4996 Sales Manager: Fred Hays (480) 672-3930 Special Waste Admin: Amy Post (928) 855-9441
Original Land Use	Native Desert
Facility Size & Permitted Landfill Area	160 Acres 130 Acres Permitted for Solid Waste Disposal
Permitted Waste Disposal Capacity	26.5 million cubic yards
Remaining Waste Disposal Capacity	25.4 million cubic yards (as of 12/31/2001)
Typical Number of Employees	4 Full-time and 1 part-time Employees on-site
List of Equipment	Landfill Compactor Dozer Excavator Motor Grader Water Truck Articulating Dump Truck
Typical Days & Hours of Operation	Monday – Friday 7:00 am – 3:30 pm
Adjacent Surrounding Land Uses	Native Desert (North, South, East, & West)
Nearest Resident	15 Miles to the Northwest (Resident Community)
Distance to Nearest Water Bodies	16 Miles to the Northwest (Colorado River)
Distance to Nearest Offsite Water Well	There are no offsite water wells in the vicinity
Activities Currently Conducted On-site	Landfill Septage Waste Ponds Waste Tire Collection Site Waste Tire Monofill

EPA ID Number	AZC950823111
State ID Number	300168
Solid Waste Facility Approval (Permit)	15004700 (approved November 16, 1998)
Expiration	Life of Facility
Solid Waste Agency/Contact	Arizona Department of Environmental Quality Solid Waste Unit (602) 207-5141
Inspection Frequency	Annual Inspections (minimum)
Date of Last Regulatory Inspection & Results	April 26, 2001 In compliance
Air Quality Permit (Title V)	1000819
Expiration	September 6, 2005
Air Quality Agency/Contact	Arizona Department of Environmental Quality Air Quality Control (602) 207-2300
Inspection Frequency	N/A
Date of Last Regulatory Inspection & Results	N/A
Zoning	HI (Heavy Industrial)
CERCLA Approval (Superfund)	WST-3-1, Notice of Continued Acceptability effective June 21, 2000

DRMO Approval (Dept of Defense)	N/A
Storm Water Pollution Prevention Plan (SWPPP) (Date)	August 28, 2001
NOI Submittal Date & Number	Submitted January 29, 2001 AZR05B372
Spill Prevention Control & Countermeasure (SPCC) Plan (Date)	August 28, 2001
Reportable Spills in Last 3 Years	None
Residential Complaints (Last 2 Years)	None
Acceptable Wastes	Municipal Solid Waste, Construction/Demolition Debris, Petroleum Contaminated Soils, Special Waste, Industrial Solid Waste, Asbestos & Asbestos Containing Materials, Dead Animals, Non-infectious Medical Waste, Industrial & Municipal Sludges, Incinerator Ash, Auto Shredder Fluff, Non-hazardous Waste, Tires, Septage (Pond)
Unacceptable Wastes	Hazardous Waste, Radioactive Waste, Infectious Medical Waste, Chemical By-products, Lead-Acid Batteries, Liquid Waste, Pressurized Containers, Fuel Tanks, Unused Pesticides & Herbicides, Used Oil, PCB Waste, Shock-Sensitive Waste
Approved Alternative Daily Cover (ADC)	Tarps
Special Waste Acceptable Program	Refer to Allied Waste's Special Waste Manual
Safety Record/Recordable OSHA Injury Frequency Rate	Year 2001 – 0 (0 Injuries x 200,000 hours/14237 actual employee hours)
Security/Access Control	6 foot perimeter fencing, lockable gate entrance

Dust Control	Dedicated Site Water Truck 10,000-Gallon Elevated Water Storage Tank
Litter Control	Litter Fencing, Continuous Litter Collecting
Tank Inventory	10,000-Gallon Diesel Fuel (Off-Road) AST 10,000-Gallon Diesel Fuel (Highway) AST 500-Gallon Unleaded Fuel AST 500-Gallon Used Oil AST
Groundwater Monitoring	ADEQ issued approval for suspension of groundwater monitoring (September 13, 1996)
Depth to Groundwater & Gradient	Estimated depth approximately 500 feet below ground surface (bgs), groundwater gradient beneath site believed to be north to northwesterly
Landfill Gas Monitoring	Quarterly monitoring event conducted by third-party
Leachate Monitoring	Monitored Bi-Weekly and After Rain Events No Regulatory Requirement for Sampling
Daily and Intermediate Cover Thickness	Daily – 6 inches of soil or approved ADC Intermediate – 12 inches of soil
Base Liner System Design (from bottom to top)	Prepared subgrade Geosynthetic Clay Liner (GCL) 60-mil HDPE Liner 24-inch Operations/Drainage Layer Leachate Collection Removal System (riser pipes, gravel, and sumps)
Final Cover System Design (from top to bottom)	18-inch Vegetative Layer 40-mil LLDPE 18-inch Nominal Foundation Layer
Landfill Operating Record	Filed in the Administrative Offices near the Facility Entrance

SIC Code	4953
Closure/Post-Closure Cost Estimates	Year 2002 Total: $1,336,403 Closure: $818,170 Post-Closure: $518,233 Year 2001 Total: $1,336,403 Closure: $818,170 Post-Closure: $518,233
Financial Assurance Mechanism	Certificate of Insurance for Closure and Post-Closure Care
Company Financials	Refer to Allied Waste Industries 10-K Form
Certificate of Insurance	Available Upon Request
Federal Tax ID	52-2044848

ATTACHMENTS

A - Permits

B - Financial Assurance Mechanism

C - Inspection Results

D - Certificate of Insurance

E - Map

U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
STORM WATER NOTICE OF INTENT CENTER

AZR05B372

Dear Operator:

03/07/2001

The EPA has processed your Notice of Intent (NOI) application for the facility noted below. **This facility is authorized to discharge storm water associated with multi-sector activity under the terms and conditions imposed by the EPA's NPDES Storm Water Multi-Sector Permit.** The facility permit number is listed above and the active date of permit coverage is 1/31/2001.

EPA's multi-sector permit requires certain pollution prevention and control measures, possible monitoring and reporting, and annual inspections. Among the conditions and requirements of this permit, you must prepare and implement a pollution prevention plan (PPP) that is tailored to your industrial site. You may also be required to submit monitoring data for your facility's storm water discharges. As a facility authorized to discharge under this storm water multi-sector permit, all terms and conditions must be complied with to maintain coverage and avoid possible penalties.

FACILITY:
LA PAZ COUNTY LANDFILL
1300 ARIZONA AVENUE
PARKER, AZ
85344

OPERATOR:
LA PAZ COUNTY LANDFILL
2011 COLLEGE DRIVE
LAKE HAVASU CITY, AZ
86403

To obtain a copy of the EPA's storm water multi-sector permit terms and conditions to which you are now held accountable, please call the EPA Office of Water Resource Center at (202) 260-7786. If you have general questions concerning the storm water program, please call the EPA Region 09 contact: Eugene Bromley, (415) 744-1906.

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

BATTERY COLLECTION/RECYCLING
FACILITY AUTHORIZATION

Issued to: La Paz County Regional Municipal Solid Waste Landfill

At the location of: 26999 State Route 95, Mile Post 128, Parker, AZ 85344

To be used for the collection and/or recycling of lead acid batteries pursuant to the Arizona Revised Statute § 44-1322.

This authorization is issued pursuant to the Arizona Revised Statute § 44-762 and will be valid as long as the facility is used for the purposes indicated above, and is maintained and operated in a satisfactory manner. This license is not transferable from person to person or facility to facility.

DAVID ESPOSITO, DIRECTOR
WASTE PROGRAMS DIVISION

NUMBER: #097

ISSUED: April 5, 2000

EXPIRES: May 1, 2005

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

June 21, 2000

CERTIFIED MAIL NO. Z 695 243 084
RETURN RECEIPT REQUESTED
In Reply Refer to: WST-3-1

Brian Conway
Facility Manager
Browning-Ferris Industries, Inc.
La Paz County Regional Municipal
Solid Waste Landfill
2011 College Drive
Lake Havasu City, AZ 86403

RE: EPA Determination of Continued Acceptability under the CERCLA Off-Site Rule

Dear Mr. Conway:

On April 26, 2000, a focused compliance evaluation was conducted by representative of the United States Environmental Protection Agency (USEPA) at the La Paz Landfill located north of Quartzite, Arizona. The purpose of the evaluation was to ascertain compliance with the Resource Conservation and Recovery Act (RCRA) Subtitle D Part 258 requirements for landfills in order to make a determination of continued acceptability under the EPA's Off-Site Rule, 40 CFR Part 300.440. The initial acceptability determination under the Off-Site Rule was made for La Paz Landfill in July 1996 and a determination of continuing acceptability was made on April 17, 1998.

No relevant violations or releases were found as a result of the compliance evaluation. La Paz Landfill may accept CERCLA waste generated as a result of a CERCLA remedial or removal action, provided that: (1) the wastes received at La Paz Landfill are not regulated by Subtitle C of RCRA; and (2) receipt of waste is in accordance with the facility's applicable permits.

On September 16, 1993, EPA amended the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), 40 CFR Part 300, by adding Section 300.440, now known as the Off-Site Rule ("Rule"). The Rule codified the requirements contained in Section 121 (d)(3) of CERCLA, 42 U.S.C. §9621 (d)(3), and incorporated many provisions of EPA's former Off-Site Policy. The Rule established criteria and procedures for determining whether facilities are acceptable for the receipt of CERCLA waste.

In accordance with the Rule, EPA reserves the right to re-evaluate the acceptability of La Paz Landfill to receive CERCLA waste should any new information affecting this determination be obtained in the future.

If you have any questions concerning this matter, please contact Kandice Bellamy, Region 9's CERCLA Off-Site Rule Coordinator, at (415) 744-2091.

Sincerely,

Rich Vaille, Chief
State Programs and Compliance Branch

Enclosure

cc: Greg Brown, ADEQ

CERTIFICATE OF INSURANCE FOR CLOSURE AND/OR POST-CLOSURE CARE

Name and Address of Insurer (herein called the "Insurer"):

Indian Harbor Insurance Company
Seaview House, 70 Seaview Avenue
Stamford, CT 06902-6040

Name and Address of Insured (herein called the "Insured"):

Allied Waste Industries, Inc.
15880 N. Greenway-Hayden Loop, Suite #100
Scottsdale, AZ 85260

FACILITIES COVERED:

Name:	La Paz Landfill
Address:	Highway 95, Mile Post Marker 128 Parker, AZ 85344
Permit # :	15004700
Amount insured for this site:	$1,336,403
Closure Amount:	$818,170
Post Closure Amount:	$518,233
Face Amount:	$1,336,403
Policy Number:	PEC0004836
Effective Date:	April 11, 2001

The Insurer hereby certifies that it has issued to the Insured the policy of insurance identified above to provide financial assurance for closure and post closure care, (insert "closure" or "closure and post-closure care" or "post-closure care") for the facilities identified above. The Insurer further warrants that such policy conforms in all respects with the requirements of 40 CFR 264.143(e), 264.145(e), 265.143(d), and 265.145(d), as applicable and as such regulations were constituted on the date shown immediately below. It is agreed that any provision of the policy inconsistent with such regulations is hereby amended to eliminate such inconsistency.

Whenever requested by the EPA Regional Administrator(s) of the U.S. Environmental Protection Agency, the Insurer agrees to furnish to the EPA Regional Administrator(s) a duplicate original of the policy listed above, including all endorsements thereon.

I hereby certify that the wording of this certificate is identical to the wording specified in 40 CFR 264.151(e) as such regulations were constituted on the date shown immediately below.

(Authorized signature for Insurer)

Scott Britt
(Name of person signing)

Vice President
(Title of person signing)

(Signature of witness or notary)

March 26, 2001
(Date)

SEAL

Notarial Seal
Tricia L. Edwards, Notary Public
Uwchlan Twp., Chester County
My Commission Expires June 21, 2004

Member, Pennsylvania Association of Notaries

La Paz County Landfill Disposal Facility

CA Hazardous Soil

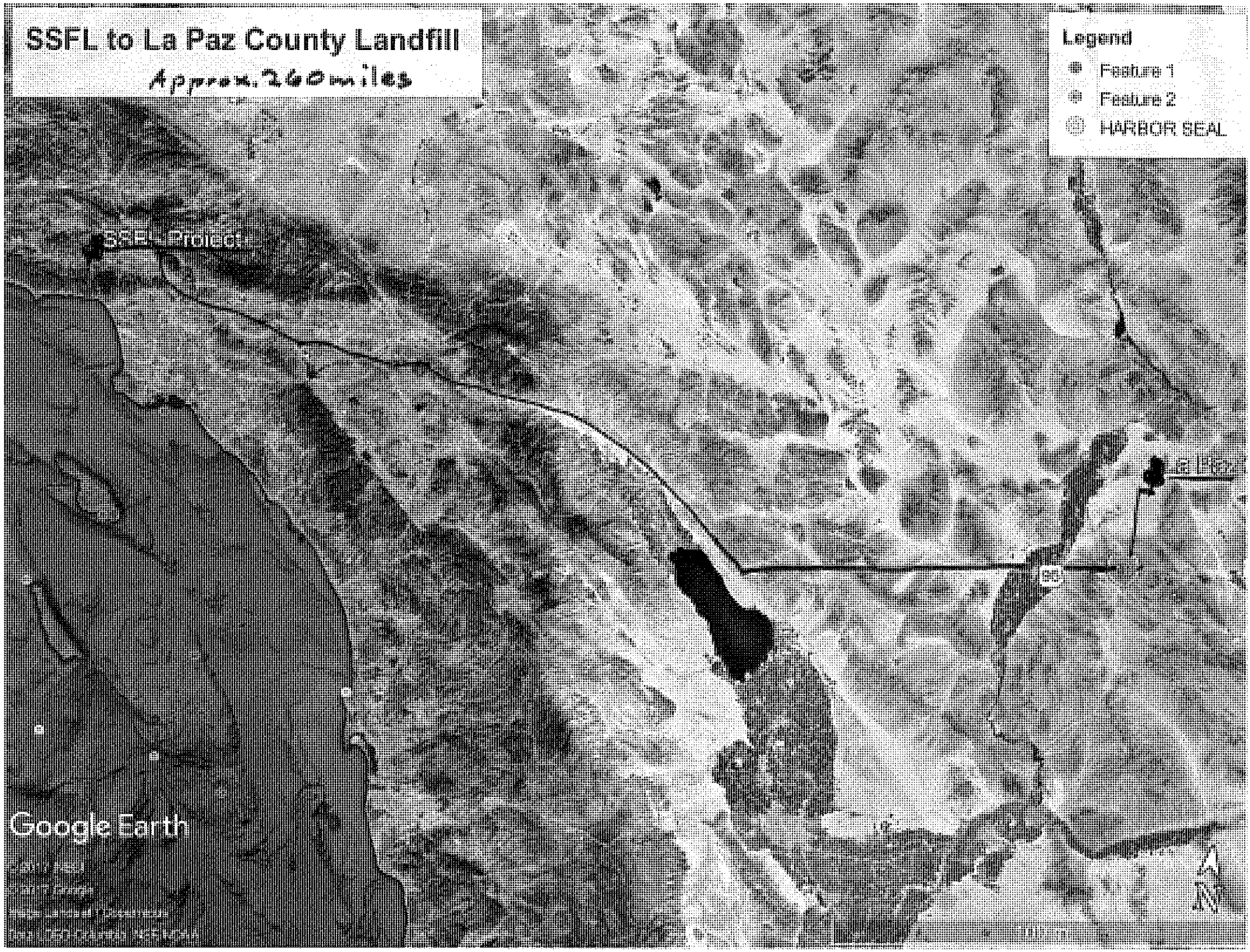
La Paz County Landfill, Arizona:
La Paz County Landfill is a 640 acre landfill owned by the County of La Paz and operated by Republic Services, Inc. The facility performs landfill disposal of non-hazardous municipal solid wastes and non-RCRA industrial wastes (including petroleum and metal contaminated soils), construction and demolition wastes, and other non-hazardous solid wastes. PCB's are acceptable up to 50 ppm. Petroleum-contaminated soil must be non-hazardous. No waste pre-treatment (e.g. solidification) is performed. See attached permit information.

La Paz is open from 7:00 a.m. until 3:30 p.m. Monday through Friday and is located at 26999 Highway 95, Milepost 128 Parker, Arizona 85344 *Note Extended hours of operations may be authorized depending on material volumes.

The waste acceptance guidelines are as follows:

Test Methods
8015M Extended Chain for Gas, Diesel and Heavy Oil
8260 Volatile Organic Compounds
8270 Semi Volatile Organic Compounds
CAM17 Metals (STLC or TCLP required if fails 10x or 20x rules)
Sulfide / Sulfates

The La Paz County Landfill does not provide sampling frequencies or test methods and instead refers you to follow the guidelines presented in SW846. If Petroleum Hydrocarbons are present in the soil, this facility will require BTEX/PAHs from an Arizona Certified Laboratory.


SSFL to La Paz County Landfill
Approx. 260 miles
Legend
Feature 1
Feature 2
HARBOR SEAL
SSFL Project
La Paz
Google Earth

Freight Fuel Consumption and Greenhouse Gas Emissions

GHG emissions from freight transportation are tied closely to freight energy use. Both are growing because energy efficiency improvements, in the freight sector, have not kept pace with the growth in demand. Within the transportation sector, freight movement accounts for 27% of transportation GHG emissions, with the majority of emissions generated by trucking, as reported in the U.S. Environmental Protection Agency's (EPA) Inventory of U.S. Greenhouse Gas Emissions.

Transportation by Rail moves one ton of freight an average of 480 miles per gallon of fuel

Gondolas vs. Truck
Transportation of Environmentally Impacted Soil from Port of Long Beach

Volume 100,000 tons

Number of Trucks	4,000	Number of Railcars	1,000
Average Loaded Weight (lbs)	80,000	Average Loaded Weight (lbs)	200,000
Average Empty Weight (lbs)	37,000	Average Empty Weight (lbs)	61,000
Distance to Buttonwillow, CA (miles)	140	Distance to ECDC, UT (miles)	844
Roundtrip	280	Roundtrip	1,688
Total Tonnes CO_2 Emitted	4,004	Total Tonnes CO_2 Emitted	1,129

Reduction in CO_2 Emissions through use of rail transportation **2,875 tonnes**

Percentage Reduction **72%**

Cost of Carbon Offsets (truck)	$40,037.00
Cost of Carbon Offsets (rail)	$11,287.00
Reduction in Cost of Carbon Offsets	**$28,750.00**
Percentage Reduction	**72%**
Cost per ton to offsets (truck)	$.22
Cost per ton to offsets (rail)	$.112

Freight Railroads Help Reduce Greenhouse Gas Emissions

ASSOCIATION OF AMERICAN RAILROADS NOVEMBER 2011

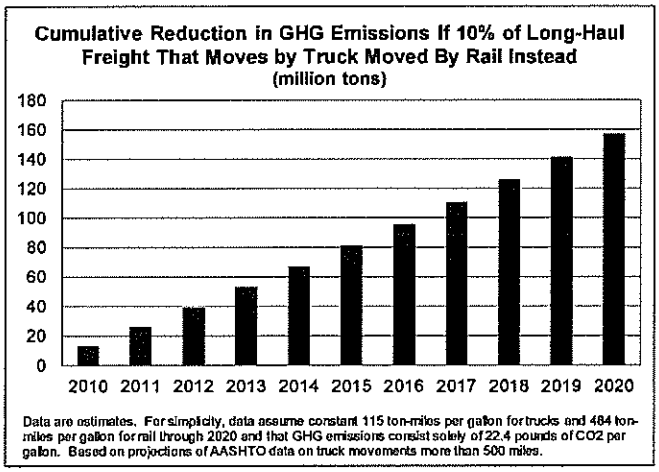
Summary

Greater use of freight rail offers a **simple, inexpensive,** and **immediate way** to meaningfully **reduce greenhouse gas emissions** without harming the economy. On average, railroads are four times more fuel efficient than trucks. That means moving freight by rail instead of truck **reduces greenhouse gas emissions by 75 percent.** According to Environmental Protection Agency (EPA) data, freight railroads account for just 0.6 percent of U.S. greenhouse gas emissions from all sources and just 2.1 percent of emissions from transportation-related sources.

Moving More Freight By Rail Would Significantly Reduce Greenhouse Gas Emissions

According to a recent independent study for the Federal Railroad Administration, railroads on average are **four times more fuel efficient than trucks.** Greenhouse gas emissions are directly related to fuel consumption. That means that **moving freight by rail instead of truck reduces greenhouse gas emissions by 75 percent.**

If just 10 percent of long-haul freight now moving by truck moved by rail instead, annual greenhouse gas emissions would fall by more than **12 million tons.** That's equivalent to taking **2 million cars off the road** or **planting 280 million trees.** Cumulative reductions through 2020 would be around **160 million tons.**



Moving more freight by rail also reduces highway congestion, which costs us $101 billion each year just in wasted time (4.8 billion hours) and wasted fuel (1.9 billion gallons), according to a recent study by the Texas Transportation Institute. **A single freight train, though, can carry the load of several hundred trucks.** Shifting freight from trucks to rail also reduces highway wear and tear and the pressure to build costly new highways.

America's seven largest freight railroads have joined the EPA's voluntary "SmartWay Transport" partnership aimed at improving fuel efficiency and reducing greenhouse gas emissions.

U.S. Greenhouse Gas Emissions By Economic Sector: 2009

Economic Sector	Tg CO2 Eq.	% of Total
Electric. generation	2,193.0	33.1%
Residential	360.1	5.4%
Industry	1,322.7	19.9%
Agriculture	490.0	7.4%
Transportation	1,812.4	27.3%
Commercial	409.5	6.2%
U.S. Territories	45.5	0.7%
Total	6,633.2	100.0%

Data are in teragrams of CO2 equivalents.

U.S. Greenhouse Gas Emissions from Transportation: 2009

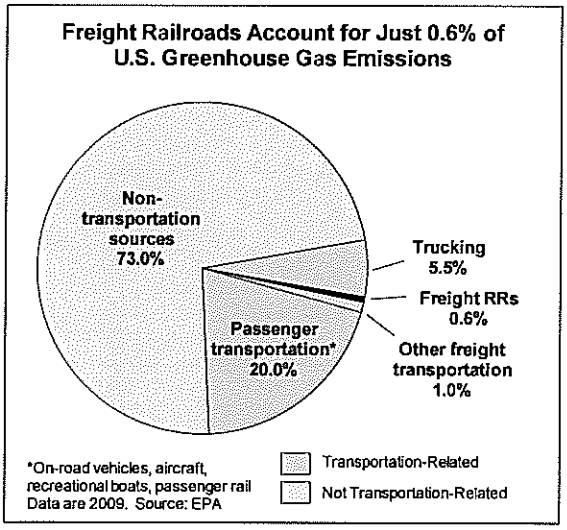
Economic Sector	Tg CO2 Eq.	% of Transp. Total
Trucking	365.6	20.4%
Freight Railroads	**37.2**	2.1%
Waterborne Freight	13.5	0.8%
Pipelines	35.2	2.0%
Aircraft	127.8	7.1%
Recrational Boats	16.9	0.9%
Passenger Railroads	6.0	0.3%
Cars, Light Trucks, Motorcycles	1,180.6	65.8%
Buses	11.2	0.6%
	1,794.0	100.0%

Source: EPA, *Inventory of U.S Greenhouse Gas Emissions and Sinks: 1990-2009*, Tables ES-7, A-111, and A-112. Totals for "transportation" in the two tables do not match because the table on the left includes emissions from sources considered to be transportation but not considered to be passenger or freight (e.g., lubricants).

Railroads Account For a Small Portion of U.S. Greenhouse Gas Emissions

According to EPA data, total U.S. greenhouse gas emissions in 2009 were 6,633 teragrams (trillion grams) of carbon dioxide equivalents (see table above). Non-transportation sources (power plants, industry, etc.) accounted for 73 percent of this total, with transportation accounting for the remaining 27 percent.

The 37.2 teragrams accounted for by freight railroads was just 0.6 percent of total U.S. greenhouse gas emissions from all sources and just 2.1 percent of transportation-related greenhouse gas emissions.



Railroads Are Constantly Working to Improve Fuel Efficiency

In 1980, one gallon of diesel fuel moved one ton of freight by rail an average of 235 miles. In 2010, one gallon of fuel moved one ton of freight by rail an average of 484 miles — a 106 percent improvement since 1980.

In 2010 alone, U.S. freight railroads consumed 3.7 billion fewer gallons of fuel and emitted **41 million fewer tons of carbon dioxide** than they would have if their fuel efficiency had remained constant since 1980. From 1980 througb 2010, U.S. freight railroads consumed almost **59 billion fewer gallons of fuel** and emitted **658 million fewer tons of carbon dioxide** than they would have if their fuel efficiency had not improved.

Railroads use a variety of means to cut fuel consumption and greenhouse gas emissions: