Town of Salina
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June 6, 2014

Lauren P. Charney
Assistant Regional Counsel U.S. EPA Region 2
290 Broadway, 19th Floor
New York, New York 10007

Re: Proposal for Former Town of Salina Landfill to Accept Lower Ley Creek Sediments

Dear Ms. Charney:

This letter represents the Town of Salina's further proposal for the former Town of Salina Landfill (the "Landfill") to be a local option for the disposal of up to 200,000 cubic yards of non-hazardous sediment dredged from the Lower Ley Creek subsite.

The Town of Salina recently completed the closure and capping of the Landfill; however, it has been determined by the Town's engineers that Parcel 2 (an area in the northwest corner of the Landfill site) could accommodate between 150,000 to 200,000 cubic yards of additional dredged sediment.

In order to accept the sediments from Lower Ley Creek subsite into the Landfill, the Town must require three items. The first item is that 100% of the associated engineering, bidding, disposal, and capping costs be paid for out of the funds recovered from the GM bankruptcy estate. Given the size of the project, the contractor for disposal and capping must be selected through a public bidding process. Therefore, final costs for the work can only be determined after bids are received. However, as set forth in Table 1 below, a cost estimate of $4,556,600 has been preliminarily calculated for the construction costs.

The second item is that the present worth value of the future O&M costs associated with the Landfill after it receives the sediments must be paid up front. As set forth below in Table 2, this amount is currently estimated to be $2,715,530.69.

The third item is that in exchange for acceptance of the dredged sediment, the Town of Salina shall be released from liability, and/or afforded contribution protection, as a PRP from

both the Lower Ley Creek subsite and the Onondaga Lake Superfund site. In return for accepting "ownership" of these sediments in perpetuity, the Town believes that its assumption of the associated responsibility and risks warrants no additional contribution by the Town to the resolution of the Lower Ley Creek and Onondaga Lake PRP liabilities.

In addition to the landfill cap and gas venting system, the Landfill includes a completed groundwater/leachate collection system. Investigations at the Landfill have shown there is a very thick clay layer separating the unconfined upper aquifer from a deeper confined aquifer. No groundwater impacts to the deeper confined aquifer have been observed. The current leachate collection trench is keyed into the clay layer or dense glacial till. While there is no bottom liner to the Landfill, the collection trench (as approved by DEC and EPA) is designed to capture contaminated groundwater and leachate that is flowing toward Ley Creek. Therefore, from an environmental protection standpoint, if a portion of the current cap is removed and sediments from Lower Ley Creek are placed directly on top of existing waste and the cap is replaced, any additional leachate generated during the disposal process would be captured by the groundwater/leachate collection system.

With regard to the potential impact to the leachate collection system, there has been a debate about whether the sediment will produce additional leachate. The Town believes that even if the sediment is "dewatered," it is unrealistic to expect that the moisture content will be 0%, and once the existing cap is removed, additional leachate will be produced during the disposal period associated with infiltration of precipitation, prior to reconstruction of the cap. The pretreatment plant at the Landfill (currently under construction) is designed to treat VOCs and PCBs based on a specific loading determined from extensive testing of the groundwater coming into the collection trench (for PCBs, the design loading was 1 μg/l which is the observed concentration in some groundwater monitoring wells). It is unknown whether the loading would be increased associated with additional sediments from Lower Ley Creek, but we assume that additional sediments with up to 49 mg/l of PCBs would lead to additional loading. That condition would require more frequent changes of the granular activated carbon (GAC) than currently anticipated. Additionally, if necessary, the plant could be modified to accommodate additional treatment equipment. From a quantity standpoint, pumps in 6 sumps situated in the collection trench are designed to produce 1 foot of drawdown in the trench. That flow rate would not be changed with the addition of the Lower Ley Creek sediments.

Finally, the following cost elements are required regardless of the final disposal site, and therefore costs associated with these items are not addressed herein:

1. Access/coordination agreements
2. Site Mobilization
3. Site Health and Safety and Community Air Monitoring
4. Sediment Dredging
5. Characterization of dredging materials as work proceeds to verify PCBs are <50ppm
6. Dewatering of sediments prior to disposal
7. Odor and Dust Control and Control of Tracking on Roads

The Town believes that the Landfill represents a cost-effective and environmentally-sound option for local disposal of the dredged sediment. Moreover, there is precedent for the consolidation of wastes into a single Class 2 inactive hazardous waste site from an adjacent disposal site, as exemplified by the Alltift Landfill located in the City of Buffalo.

We look forward to future discussions with EPA, DEC and the PRP group regarding the proposal set forth herein.

Sincerely,

Mark A. Nicotra
Supervisor, Town of Salina

cc: Town Board of the Town of Salina
James Doyle, Esq., U.S. Environmental Protection Agency
Pam Tames, P.E., U.S. Environmental Protection Agency
Christopher A. Burns, Ph.D., P.G.
Robert D. Ventre, Esq.
Frank C. Pavia, Esq.

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Table 1

Removal, Sediment Disposal, and Replacement of Cap	**Estimated Costs**
Construction Costs	
Removal of current cover materials and membrane	$500,000
Placement/Grading of 200,000 CY	$1,360,000
Re-capping and replacement of cover materials ($200,000/acre)	$2,200,000
Subtotal	**$4,060,000**
Engineering and Legal Costs	
Engineering Design (5% of Construction)	$203,000
Engineering Construction Oversight (6% of construction)	$243,600
Legal	$50,000
Subtotal	**$496,600**
Total Cost for Removal, Sediment Disposal and Replacement of Cap	**$4,556,600**

Table 2

SALINA LANDFILL ESTIMATED POST-CLOSURE COSTS					
Estimate Prepared 2/26/2013					
Years 1-5					
Item Description	**Unit**	**Unit Cost**	**Quant.**		**Comments**
Environmental Monitoring	YR	$52,510.00	1	$52,510.00	*Includes laboratory, labor & reporting costs*
	Annual Cost			$52,510.00	
	Subtotal Present Net Worth			$215,301.37	
Years 6-7					
Item Description	**Unit**	**Unit Cost**	**Quant.**		**Comments**
Environmental Monitoring	YR	$28,010.00	1	$28,010.00	*Includes laboratory, labor & reporting costs*
	Annual Cost			$28,010.00	
	Subtotal Present Net Worth			$50,642.59	
Years 8-10 and Year 15, 20, 25, and 30					
Item Description	**Unit**	**Unit Cost**	**Quant.**		**Comments**
Environmental Monitoring	YR	$15,760.00	1	$15,760.00	*Includes laboratory, labor & reporting costs*
	Annual Cost			$15,760.00	
	Subtotal Present Net Worth			$84,935.20	
Years 1-30					
Item Description	**Unit**	**Unit Cost**	**Quant.**		**Comments**
Landfill Cap and Monitoring					
Mowing of Cap	YR	$2,000.00	1	$2,000.00	
Snow Removal	YR	$2,000.00	1	$2,000.00	
Annual repairs to cap/fence/access roads	YR	$2,000.00	1	$2,000.00	
Leachate Pre-treatment Plant					
Labor, Utilities, Materials & Maintenance	Month	$9,850.00	12	$118,200.00	
OCDWEP Charge for Metro WWTP Treatment	Unit	$358.68	65.18	$23,378.76	*Unit = 140,000 gallons, so 25,000 gpd*365 days per yr/140,000 gallons = 65.18 units*
Laboratory Testing (25,000 gpd)	Month	$1,290.00	12	$15,480.00	
Carbon	Month	$1,000.00	12	$12,000.00	
Bag Filters	Month	$1,000.00	12	$12,000.00	
Dewatered Sludge Hauling & Disposal	Ton	$500.00	1	$500.00	
Collection Trench/Force Main Cleaning	YR	$3,000.00	1	$3,000.00	*Assume $1,000 for engineering oversight & $2,000 for subcontractor*
	Annual Cost			$190,558.76	
	Subtotal Present Net Worth			$2,364,651.53	
Total Present Net Worth				**$2,715,530.69**	