TETRA TECH

October 31, 2025

Drae Rogers
Hydrogeologist
Wisconsin Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54313

Re: Adams County Sanitary Landfill
Feasibility Report Addendum No. 1 – Proposed Vertical Expansion
Friendship, Wisconsin
WDNR License No. 03150 FID No. 701040560

Dear Mr. Rogers,

On behalf of Adams County Solid Waste & Recycling (Adams County), Cornerstone Environmental Group - a Tetra Tech Company (Tetra Tech) is pleased to submit to the Wisconsin Department of Natural Resources (WDNR) the Addendum No. 1 to the Feasibility Report (FR) for the proposed Vertical Expansion of the Adams County Sanitary Landfill. The FR Addendum No. 1 was prepared in accordance with Wisconsin Administration Code NR 512. At your request, an electronic copy has been uploaded to the WDNR provided Box.com account and a hard copy of the revised plan sheets will be shipped to your office for your review. Additional copies of the FR Addendum No. 1 have been distributed according to the attached distribution list.

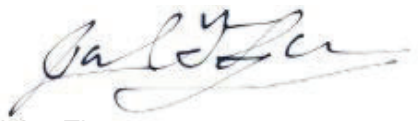
Adams County is requesting that the WDNR review and approve the FR and FR Addendum No. 1. Please feel free to call Jalen Thomas at (630) 410-7225 with any questions regarding the FR Addendum No. 1 or if you would like to set up a time to meet and discuss.

Please send the WDNR's review fee invoice to Adams County Solid Waste & Recycling.

Delivery receipts for the transmittal of the FR Addendum No. 1 to the municipalities and the library will be forwarded to the WDNR upon their return to Tetra Tech.

Sincerely,

CORNERSTONE ENVIRONMENTAL GROUP, LLC – A TETRA TECH COMPANY



Jalen Thomas
Project Manager

Enclosure: Feasibility Report Addendum No. 1 – Adams County Sanitary Landfill - Vertical Expansion

cc: Per the attached distribution list

TETRA TECH
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Adams County Sanitary Landfill
Vertical Expansion – Feasibility Report Addendum No. 1
Distribution List

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Adams County Sanitary Landfill
Vertical Expansion – Feasibility Report Addendum No. 1
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Ben Peotter / Luke Specketer Tetra Tech 8040 Excelsior Drive, Suite 305 Madison, WI 53717	1 Electronic Copy (FR Addendum No. 1)

Feasibility Report – Addendum No. 1

Adams County Sanitary Landfill Vertical Expansion

October 31, 2025

209-4251274

PREPARED FOR

Adams County Solid Waste & Recycling
1420 State Highway 21
Friendship, WI 53934

PREPARED BY

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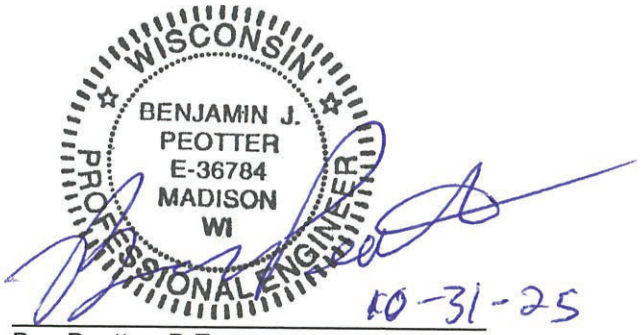
TETRA TECH

REPORT CERTIFICATION

Feasibility Report Addendum No. 1
Adams County Sanitary Landfill – Vertical Expansion
Town of Strongs Prairie, Adams County, Wisconsin

I, Ben Peotter, hereby certify that I am a licensed professional engineer in the State of Wisconsin in accordance with the requirements of ch. A-E 4, Wis. Adm. Code; that this document has been prepared in accordance with the Rules of Professional Conduct in ch. A-E 8, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 500 to 538, Wis. Adm. Code.



Ben Peotter, P.E.
Wisconsin P.E. No. E-36784-6

I, Luke Specketer, hereby certify that I am a licensed professional geologist in the State of Wisconsin in accordance with the requirements of ch. GHSS 2, Wis. Adm. Code; that the preparation of this document has not involved any unprofessional conduct as detailed in ch. GHSS 5, Wis. Adm. Code; and that, to the best of my knowledge, all information contained in this document is correct and the document was prepared in compliance with all applicable requirements in chs. NR 500 to 538, Wis. Adm. Code.

Luke Specketer, P.G.
Wisconsin P.G. No. PG-1400

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APPENDICES

1.0 BACKGROUND

On behalf of the Adams County Solid Waste & Recycling, Ayres Associates (Ayres) prepared and submitted a Feasibility Report (FR) to the Wisconsin Department of Natural Resources (WDNR) dated February 7, 2023, for a proposed Vertical Expansion of the existing Adams County Sanitary Landfill. The FR included information required to determine the feasibility for the proposed Vertical Expansion of the Adams County Sanitary Landfill (WDNR License No. 3150, FID No. 701040560). Following their initial review of the FR, the WDNR issued an Incompleteness Determination Letter of the FR to Adams County dated April 14, 2023 (Appendix A1). The WDNR letter contained comments in two separate sections – Parts A and B.

This Addendum (No. 1) contains responses that address the twelve items in Part A – Information Required to Complete the FR, so that the WDNR can deem the FR Complete and continue with their review of the proposed Vertical Expansion FR. Additionally, this Addendum contains responses to the five items in Part B – Additional Information Required for a Feasibility Determination.

This Addendum No. 1 to the FR has been prepared by Tetra Tech, on behalf of Adams County Solid Waste & Recycling (Adams County) as the applicant. Please note that as part of this response, Ayres Associates' Professional Engineer and Professional Geologist have stamped/certified the original plan set for the proposed Vertical Expansion Feasibility Report. As part of this response, Tetra Tech has prepared two sheets to replace or supplement the Ayres' plan set. This includes Plan Sheet 2R (Existing Conditions) and Plan Sheet 25R (Environmental Monitoring Plan). These two sheets, alone, along with the updated Plan Sheet 1 (Cover Sheet) are stamped/certified by Tetra Tech's Professional Engineer and Professional Geologist.

2.0 RESPONSES TO THE WDNR'S COMMENTS

The WDNR's Letter of Incompleteness dated April 14, 2023 (Appendix A1) is divided into two parts:

- Part A contains a list and explanation of the items needed to determine completeness of the FR in accordance with NR 512, Wis. Adm. Code, and Chapter 289 of the statutes, and chs. 500, 504, 507, and 512, Wis. Adm. Code;
- Part B is a description of additional information required for a feasibility determination. Comments from the WDNR Letter of Incompleteness are provided below in italics, followed by responses.

2.1 PART A. INFORMATION NEEDED TO COMPLETE THE FEASIBILITY REPORT

1. ***Noncompliance with plans or orders [s. 289.34, Wis. Stats. and s. NR 512.19, Wis. Adm. Code]:*** *Provide a list identifying all other Wisconsin solid or hazardous waste facilities for which Adams County is named in, or solid or hazardous waste facilities which are owned by Adams County. Also provide a statement indicating whether the Adams County facilities are in compliance with all plan approvals and orders relating to all identified facilities. Section 1.1.1 of the feasibility report indicates Adams County owns a materials recovery facility (MRF) and a construction and demolition (C&D) landfill, and Section 12.7 of the feasibility report indicates Adams County operates a compost facility.*

   Response:

   Adams County is named in or owns the following solid or hazardous waste facilities:

   - Adams County Sanitary Landfill (WDNR License No. 3150) – Solid Waste Disposal; Municipal Solid Waste Landfill; Greater than 500,000 cubic yards
   - Adams County Materials Recovery Facility (MRF) (FID No. 999824980). MRF's are not assigned WDNR License Numbers.
   - Adams County Demolition Site (WDNR Monitoring ID No. 3228) (FID No. 701040670) - Closed Construction & Demolition (C&D) landfill located west of the Adams County Landfill and Recycling Center. C&D Landfills are not assigned WDNR License Numbers.
   - Yard Waste Compost Facility (WDNR License No. 4831) – Solid Waste Processing; Composting Yard Residuals; <20,000 cubic yards

   The solid waste facilities owned by Adams County are in compliance with plan approvals and orders relating to the identified facilities. A Certification of Compliance letter is provided in Appendix B1 of this Addendum No. 1.

2. ***General submittal requirements [s. NR 500.05, Wis. Adm. Code]****:*

   a. *Section NR 500.05(2), Wis. Adm. Code: Provide a cover letter detailing the desired department action or response.*

      Response:

      A cover letter detailing the desired department action is included with this Addendum No. 1 submittal. Adams County believes that the responses included in this Addendum No. 1 adequately address the additional information requested by the WDNR in their Incompleteness Letter dated April 14, 2023. The information provided allows the WDNR to complete the outstanding portions of the feasibility review process and issue a completeness determination.

b. *Section NR 500.05(4)(a), Wis. Adm. Code: Provide plan sheets under the seal of a licensed professional engineer and professional geologist.*

Response:

The September 2022 plan set submitted as part of the February 2023 Vertical Expansion FR was prepared by the same Ayres professional engineer (PE) and professional geologist (PG) who certified the February 2023 Vertical Expansion FR. The PE and PG from Ayres were contacted to provide their seal of the September 2022 Vertical Expansion FR plan set. A copy of the September 2022 Vertical Expansion FR Title Sheet (Plan Sheet 1) with the seal of the certifying PE and PG is provided in Appendix C1 of this Addendum No. 1.

The revised plan sheets submitted as part of this Addendum No. 1 are certified under the seal of a licensed professional engineer and professional geologist in accordance with Wis. Adm. Code Section NR 500.05(4)(a), as shown on the revised Cover Sheet (revised Plan Sheet 1R) provided in Appendix C1 of this Addendum No. 1.

c. *Sections NR 500.05(6) and NR 500.05(6)(c), Wis. Adm. Code: Provide a revised well location figure (Figure 5) that depicts the correct location of the high capacity, non-potable well (WUWN K0311) and the private well south of the landfill office (WUWN AJ514). The figure appears to depict a private well located within 1,200 feet of the limits of waste, however, Section 7.1.5 of the feasibility report indicates there are no private wells within 1,200 feet of the limits of waste. Additionally, the figure should be revised so that it contains a legend for all symbols. The hollow circles and solid squares on the figure are not included in the legend.*

Response:

Figure 5 has been revised to clarify the locations of water supply wells and include all symbols in the map legend. The high capacity, non-potable well (WUWN K0311) and the private well south of the landfill office (WUWN AJ514) are shown in the correct locations on revised Figure 5. The nearest private well is AJ514, located approximately 1,395 ft from the limits of waste; therefore, no private wells are located within 1,200 ft of the limits of waste. Revised figures are provided in Appendix D1 of this Addendum No. 1 that demonstrates compliance with this requirement.

d. *Section NR 500.05(6)(c), Wis. Adm. Code:*

i) *Provide numbered figures. The individual PDF titles of the figures in the electronic version of the submittal are numbered but the figures themselves do not have numbers indicating which figure is which.*

Response:

Numbered figures are provided in Appendix D1 of this Addendum No. 1.

ii) *Provide a revised existing conditions plan sheet (Plan Sheet 2) that contains a legend entry indicating what "LM" defines. The force main near the north side of Phases 1-4 has various points marked "LM-" that are not defined in the legend.*

Response:

A revised existing conditions map (Plan Sheet 2R) is provided in Appendix C1 of this Addendum No. 1. The revised existing conditions map includes all symbols in the legend. The "LM" item is defined as an existing leachate manhole.

iii) *Provide a revised existing conditions plan sheet (Plan Sheet 2) that contains a legend entry indicating what "CLR-" defines. There are two areas marked "CLR-" on the north side of Phases 1 and 2 that are not defined in the legend.*

Response:

A revised existing conditions map (Plan Sheet 2R) is provided in Appendix C1 of this Addendum No. 1. The revised existing conditions map includes all symbols in the legend. The "CLR" item is defined as an existing lysimeter.

3. ***Soil Borrow Sources [s. NR 504.075 and NR 512.15(2), Wis. Adm. Code]:*** *Provide the following information for the proposed soil borrow source.*

a. *Section NR 504.075, Wis. Adm. Code: Clarify if the proposed soil borrow source described in Section 9.1 would be used for soil barrier layer material and if the soil from the proposed soil borrow source would meet the requirements of s. NR 504.07(4)(a), Wis. Adm. Code. Section 8.5 of the feasibility report indicates the proposed vertical expansion's final cover would consist of a GCL and two feet of compact general fill soil. Two feet of general fill soil would not meet the requirements of s. NR 504.07(4)(a), Wis. Adm. Code.*

Response:

The permitted on-site soil borrow source is proposed to be used for the soil barrier layer material in the composite final cover system. Section 8.5 of the 2023 FR was incorrect. The proposed Vertical Expansion composite final cover system, from top down, will consist of the following layers:

- 6 inches topsoil
- 18 inches rooting zone
- 12 inches granular drainage layer
- 40 mil LLDPE geomembrane
- Geosynthetic Clay Liner (GCL)
- 24 inches soil barrier layer
- 6 inches grading layer

The soil barrier layer material from the identified and permitted borrow source will meet the requirements of NR 504.07(4)(a)(12) and the final cover will be designed and installed per NR 504.07(4)(a) requirements.

b. *Section NR 504.075(4)(a), Wis. Adm. Code: Provide narrative detailing the requirements of this code section.*

Response:

Adams County is no longer proposing a new soil borrow source as part of the proposed Vertical Expansion FR. The previously permitted soil borrow source, located northwest of the landfill on Adams County-owned property, was initially approved as part of the 1988 Conditional Plan of Operation Approval letter, and an expansion of this soil borrow source was approved as part of the 2019 Conditional Plan of Operation Approval letter issued by the WDNR (Appendix A1). The permitted soil borrow source has sufficient soil volume remaining to provide 2-feet of soil barrier layer material for the next phase of final cover construction.

c. *Section NR 504.075(4)(b), Wis. Adm. Code: Provide narrative and plan sheets detailing the requirements of this code section.*

Response:

Adams County is no longer proposing a new soil borrow source as part of the proposed Vertical Expansion FR; therefore, a response to this comment is no longer necessary.

d. *Section NR 504.075(5)(b) and (d), Wis. Adm. Code: Provide the laboratory data for the remaining test pits. Appendix Q includes grain size analyses to 0.002 mm particle size for 2 samples from test pits 1-10, however the narrative of the feasibility report states that 17 test pits were completed.*

Response:

Adams County is no longer proposing a new soil borrow source as part of the proposed Vertical Expansion FR; therefore, a response to this comment is no longer necessary.

e. *Section NR 504.075(5)(d), Wis. Adm. Code: Provide all required testing for the soil borrow source from this code section.*

Response:

Adams County is no longer proposing a new soil borrow source as part of the proposed Vertical Expansion FR; therefore, a response to this comment is no longer necessary.

f. *Section NR 504.075(6), Wis. Adm. Code: Provide narrative and plan sheets detailing the requirements of this code section*

Response:

Adams County is no longer proposing a new soil borrow source as part of the proposed Vertical Expansion FR; therefore, a response to this comment is no longer necessary.

g. *Section NR 504.075(7), Wis. Adm. Code: Provide narrative and plan sheets detailing the requirements of this code section if the intent is to use soil from the soil borrow source as soil barrier layer in final cover construction.*

Response:

Adams County is no longer proposing a new soil borrow source as part of the proposed Vertical Expansion FR; therefore, a response to this comment is no longer necessary.

h. *Section NR 504.075(9), Wis. Adm. Code: Provide additional narrative on how the requirements of this code section are met.*

Response:

Adams County is no longer proposing a new soil borrow source as part of the proposed Vertical Expansion FR; therefore, a response to this comment is no longer necessary.

i. Section NR 504.075(10), Wis. Adm. Code: Provide a copy of the county non-metallic mining reclamation plan and its related county approval. The plan is referenced in Section 9.1 of the feasibility report but is not included.

Response:

Adams County is no longer proposing a new soil borrow source as part of the proposed Vertical Expansion FR; therefore, a response to this comment is no longer necessary.

j. Section NR 512.15(2), Wis. Adm. Code: Clarify if the proposed soil borrow source is needed for final cover construction in the proposed vertical expansion's first phase.

Response:

Adams County is no longer proposing a new soil borrow source as part of the proposed Vertical Expansion FR. The permitted soil borrow source will be utilized for constructing the first final cover phase of the proposed Vertical Expansion.

k. Clarify what is the solid line oriented north-south that divides the soil borrow source on plan sheets 1-3 in Appendix R.

Response:

Adams County is no longer proposing a new soil borrow source as part of the proposed Vertical Expansion FR; therefore, a response to this comment is no longer necessary.

l. Clarify what "protective cover soils" are as described in Section 9.0 of the feasibility report and what they would be used for.

Response:

It is not clear what the "protective cover soils" is referring to in Section 9.0 of the 2023 FR. It is suspected that protective cover soils referred to the final cover rooting zone soil and topsoil since those soils protect the geomembrane below.

Soils required for construction of the proposed Vertical Expansion final cover and landfill operation will include: general fill material needed for daily cover, intermediate cover, waste grading layer and rooting zone soil; aggregate/granular material for drainage layer; soil barrier layer material from the permitted soil borrow source; and topsoil.

4. General Submittal Requirements [s. NR 512.05, Wis. Adm. Code]: *Provide the following in an addendum:*

a. The missing information from Appendix H. The electronic feasibility submittal contains a PDF (titled "2017-2021") that doesn't appear to be in Appendix H of the physical submittal.

Response:

Appendix H of the February 2023 Vertical Expansion FR contained baseline groundwater laboratory results and field forms that were submitted with the 2016 Horizontal Expansion FR that included the footprint of the proposed Vertical Expansion. No new groundwater monitoring wells have been installed at the Adams County Sanitary Landfill for the proposed Vertical Expansion. Therefore, the submission of Groundwater Laboratory Results and Field Forms (Appendix H) is rescinded from the 2023 Vertical Expansion FR due to its irrelevance. Email correspondence between the WDNR and Tetra Tech regarding this comment is included in Appendix A1 of this

Addendum No. 1. Discussion of NR 140 exceedances is included in the response below to WDNR Comment No. 9.a.

b. *Table 11-3. The electronic feasibility submittal pdf that combines all portions of the report into a single PDF doesn't contain Table 11-3.*

Response:

Table 11-3 submitted as part of the February 2023 Vertical Expansion FR has been updated as part of the revised Need Analysis (Section 11) for this Addendum No. 1. The revised Needs Analysis and accompanying revised tables are included in Appendix L1 of this Addendum No. 1.

5. General Facility Information [s. NR 512.07. Wis. Adm. Code]:

a. *Provide the design capacity and anticipated site life of the proposed vertical expansion without the existing landfill.*

Response:

The design capacity for the proposed Vertical Expansion is approximately 247,500 cubic yards. The cut/fill volume report generated from AutoCAD is provided in Appendix G1 of this Addendum No. 1. Based on calculations prepared as part of the revised Needs Analysis (Section 11) in Appendix L1, the proposed Vertical Expansion will extend the remaining site life of the Adams County Sanitary Landfill from 2028 to 2031, assuming the expansion is operational by 2026, and current waste intake rates continue. Therefore, the proposed Vertical Expansion will add approximately 3 years of site life.

b. *Provide the total design capacity and anticipated site life of the proposed vertical expansion with the existing landfill.*

Response:

The total design capacity of the existing landfill with the proposed Vertical Expansion is 1,495,500 cubic yards. The currently permitted design capacity is 1,248,000 cubic yards, according to the February 14, 2019 plan of operation approval letter from the WDNR. The proposed Vertical Expansion design capacity is approximately 247,500 cubic yards (Appendix G1).

The calculated site life of the existing landfill with the proposed Vertical Expansion being operational in 2026 is approximately 6 years. Table 11-9 of the revised Needs Analysis (Section 11) in Appendix L1 provides the available disposal capacity, estimated disposal rate and estimated remaining years of disposal capacity for the existing landfill with the proposed Vertical Expansion.

6. Alternative Geotechnical Investigation Program [s. NR 512.085, Wis. Adm. Code]:

a. *Provide a copy of the accepted alternative geotechnical investigation program (AGIP) as it was submitted to the department in October 2022. The department's January 10, 2023, acceptance letter of the proposed AGIP requested this information be included in the feasibility report.*

Response:

The October 2022 AGIP report, prepared by Ayres, and the corresponding January 10, 2023 letter issued by the WDNR for the Acceptance of Proposed AGIP for Feasibility Study of Adams County Sanitary Landfill are provided in Appendix H1 of this Addendum No. 1.

b. *Provide a discussion regarding sampling procedures and the validity of groundwater data collected from wells with submerged screens in the feasibility report. The department's January 10, 2023, acceptance letter of the proposed AGIP requested this information be included in the feasibility report.*

Response:

Groundwater elevations have fluctuated over the years at the Adams County Sanitary Landfill. High groundwater elevations during September 2019 to September 2020 submerged (groundwater elevation higher than the top of the well screen) all but one of the nineteen groundwater monitoring well screens. Groundwater elevations have lowered since the September 2020 monitoring event, and since 2023 only three out of nineteen groundwater well screens have been submerged. Table I1-1 in Appendix I1 of this Addendum No. 1 provides a summary of the groundwater elevations recorded since 2015 in comparison to the top of screen elevation of each monitoring well.

Samples collected from groundwater monitoring wells with submerged screens using standard groundwater monitoring techniques (i.e. purging or low flow sampling techniques) are valid because groundwater from the surrounding formation at the screen depth is pulled into the well screen following purging or during low flow sampling. The formation water is then collected for analytical testing.

Groundwater elevation data collected from submerged screens is valid at the Adams County Sanitary Landfill because the hydraulic conductivity of the soils that groundwater monitoring wells are screened in (sand to silty sand with hydraulic conductivity ranging from 4.60×10^{-4} to 4.10×10^{-1} cm/s), is similar to the conductivity of the filter pack around the wells. This similarity in hydraulic conductivity would allow for the groundwater level to equilibrate between the water table and the submerged well screen.

c. *Provide documentation/discussion that indicates a search for missing forms was conducted within the 1986 feasibility report, the plan of operation report that followed and subsequent liner construction documentation reports. The department's January 10, 2023, acceptance letter of the proposed AGIP requested this information be included in the feasibility report. The AGIP included information regarding well completion forms, boring log abandonment forms and well information forms that had not been located, particularly for the older borings and wells.*

Response:

Ayres searched for the missing forms and compiled a list of what was missing as part of the October 2022 AGIP. Tetra Tech has looked through the available documents that Adams County has provided and was also unable to find the missing forms. Additional search efforts could be attempted at one of the WDNR service stations if the Department requires these in the future. However, given this is a proposed Vertical Expansion, this information has already been reviewed in prior permitting submittals and should not impact the feasibility of the proposed Vertical Expansion.

7. ***Data Presentation [s. NR 512.11(1), Wis. Adm. Code]:*** *Provide a revised existing conditions plan sheet (Plan Sheet 2) that depicts all the water supply wells with 1,500 feet of the limits of waste. Based on the well locations figure (Figure 5), there may be two water supply wells within 1,500 feet of the limits of waste.*

   Response:

   All water supply wells within 1,500 ft of the limits of waste were shown on the February 2023 existing conditions map. Figure 5 was revised as part of this Addendum No. 1 to reflect water supply well locations accurately. The only private well located within 1,500 feet of the limits of waste is the landfill office well (WI Unique Well No: AJ514), located approximately 1,395 ft south of the existing landfill footprint. A revised existing conditions map (Plan Sheet 2R) is included in Appendix C1 of this Addendum No. 1 but was not revised as a result of this WDNR Comment 7 but due to other comments received.

8. ***Waste and Leachate Characterization [s. NR 512.12, Wis. Adm. Code]:***

   a. *Section NR 512.12(2), Wis. Adm. code: Provide actual field leachate data from the existing landfill. No leachate data is provided in the feasibility report.*

      Response:

      Leachate analytical and field data from the existing Adams County Sanitary Landfill from March 2022 through March 2025 is summarized in Table M1-1 in Appendix M1 of this Addendum No. 1. Table M-1 includes a summary of Volatile Organic Compounds (VOCs), Semi-Volatile Organic Compounds (SVOCs), and leachate monitoring parameters for MSW landfills reported semiannually. However, in accordance with the approved February 2019 Environmental Monitoring Program, some leachate monitoring parameters for MSW landfills are required to be sampled on a quarterly basis, rather than a semiannual basis, and SVOCs are only required to be sampled annually. Quarterly leachate data (June and December sampling events) is not reported on the WDNR GEMS database. Adams County is committed to following the approved February 2019 Environmental Monitoring Plan in future monitoring events.

   b. *Section NR 512.12(3), Wis. Adm. Code: Provide a revised Table 6-1 that includes maximum leachate generation rates with Phase 2 as partially open (similar to Table 3-3 in Appendix N) and Phase 6 constructed. Additionally, Section 6.2 of the feasibility report states the existing 30,000-gallon leachate storage tank meets the requirements of s. NR 504.06(5)(o) Wis. Adm. Code; however, applying the maximum leachate generation rate (7,674 gallon per day) over a 4-day period results in an amount greater than 30,000-gallons.*

      Response:

      Revised leachate generation and storage calculations were prepared under two conditions: the worst-case scenario and the fully closed scenario.

      The maximum leachate generation (worst-case scenario) occurs when Phases 1 and 2 are under composite final cover, a small portion of Phase 3 is under composite final cover, and the remaining Phase 3 area in addition to Phases 4 through 6 are all uncapped (with intermediate or no cover). The revised calculations are located in Appendix M1 of this Addendum No. 1. The resulting maximum 4-day storage volume required is approximately 30,524 gallons.

      The existing underground leachate storage tank has a capacity of 30,000 gallons and the existing aboveground leachate storage tank (constructed in late 2023, after the 2023 FR was submitted) has a capacity of 35,000 gallons. Therefore, the Adams County Sanitary Landfill has sufficient

leachate storage volume (65,000 gallons) to meet the NR 504.06(5)(o) requirement for 4-day storage.

c. *Provide a revised table from Section 6.1 of the feasibility report. The tonnages provided in the Section 6.1 table don't appear to accurately reflect the amount of waste accepted at the existing landfill since 2019 as shown in Table 11-2.*

Response:

The table embedded within Section 6.1 of the 2023 FR was revised and is provided as Table I1-2 in Appendix I1 of this Addendum No. 1. Table I1-2 utilized the last five years of published landfill tonnage data (2020-2024) from the WDNR Landfill Annual Tonnage - Capacity Reports. Based on the data, anticipated waste types are consistent with the current waste streams/types at the current landfill. The total percentage of waste composition (based on averages) is summarized in Table I1-2.

9. Existing Facility Performance [s. NR 512.13(4), Wis. Adm. Code]:

a. *Provide a discussion on the compliance status of the existing landfill.*

Response:

The compliance status of the existing Adams County Sanitary Landfill for groundwater, explosive gas, and leachate head monitoring are discussed below.

Groundwater Standards

The existing groundwater monitoring compliance status and facility performance has been evaluated. The preventive action limit (PAL) has been attained or exceeded for indicator parameters at the Adams County Sanitary Landfill groundwater monitoring wells and piezometers which are discussed further in WDNR Comments 9.b. and 9.c. below.

An exemption in accordance with NR 140.28(3)(a) and/or NR 140.28(4)(a) is requested for sulfate at MW-22 due to a detection above the PAL and ES standards in a samples collected in March, June and September 2025. Sulfate is a naturally occurring element but can also be present from a variety of anthropogenic sources such as agricultural fertilizers. Sulfate has not been sampled at MW-22 historically and baseline monitoring for sulfate has not been completed.

Explosive Gas Limits

The existing facility gas monitoring compliance status and performance has been evaluated. Based on a review of historical gas probe measurements, gas probe GP-1 had a single detection above 25% lower explosive limit (LEL) for methane (which is 1.25%) during September 2024. The GP-1 reading during this event was 3.4% methane by volume, but GP-1 has not exceeded the lower explosive limit before or since this event, and appeared to be a one-time reading. The other Adams County Sanitary Landfill gas probes (GP-2 and GP-3) have not historically exceeded the lower explosive limit for methane. Please note, gas probe GP-4, located on the east side of the Landfill, was not installed until June 20, 2025. GP-4 did not exceed the lower explosive limit for methane in the September 2025 quarterly event. Overall, gas probe monitoring at the Adams County Sanitary Landfill has demonstrated that the gas extraction system has be effective in limiting methane migrating outside the limits of waste.

Leachate Head on Landfill Liner

The existing facility leachate head level monitoring compliance status and performance has been evaluated. Based on a review of historical leachate headwell data, leachate head on the landfill

liner greater than one foot has been reported at Leachate Headwells LHW-5, LHW-9, and LHW-10A between May 2025 and September 2025. LHW-5 has had head elevations between 1.27 and 2.20 feet, LHW-9 has had head elevations between 1.25 and 3.52 feet, and LHW 10A has had head elevations between 0.22 and 1.62 feet over this time period. Leachate Headwells LHW-6, LHW-7, LHW-8, and LHW-9A have had head elevations of zero feet above the liner from May 2025 to September 2025 and LHW-10 has had head elevations ranging from 0.06 to 0.12 feet above the liner.

It should be noted that there have been several changes in landfill leadership and consulting services since 2023 which have resulted in some lapses of leachate head monitoring, reporting and management. Adams County has a greater understanding of the processes necessary to monitor, report and manage leachate head on the liner. Adams County is committed to continuing to improve their operations related to leachate management moving forward.

Leachate headwell elevations above 1.0 feet on the liner, as noted above, are believed to be due to rain events that increase leachate levels in uncapped areas and take time to pump down and haul off-site.

b. *Provide a revised Section 7.2.4 that discusses volatile organic compound (VOC) detections for acetone (3/4/2020) and toluene (3/2/2021) at MW-1, and chloromethane (3/3/2021) at MW-31.*

Response:

A revised Section 7.2.4 of the 2023 FR text discusses VOC detections for the requested parameters and monitoring wells. Table F1-1 was created to summarize the VOC detections in groundwater monitoring wells from March 2012 to March 2025. The revised Section 7.2.4 text and Table F1-1 are included in Appendix F1 of this Addendum No. 1.

c. *Clarify why a discussion is provided in Section 7.2.4 for indicator parameter PAL exceedances at MW-22 but not for the other wells with indicator parameter PAL exceedances as indicated in the Section 7.3.1 tables. Provide a discussion on those respective exceedances at the associated wells.*

Response:

A discussion of the indicator parameter PAL exceedances at the groundwater monitoring wells is provided in the revised Section 7.2.4 text. Table F1-2 replaces the summary tables provided in Section 7.3.1 of the 2023 FR and summarizes the indicator parameter PAL exceedances in groundwater monitoring wells from March 2012 to March 2025 in one table. The revised Section 7.2.4 text and Table F1-2 are provided in Appendix F1 of this Addendum No. 1.

d. *Clarify how leachate head measurements are being performed and reported. It's not clear how a range of values for leachate depth such as 0 ft to 45.3 ft at head well LH-5 or 0 ft to 23 ft at head well LH-7 could be reported (as identified in Section 7.3.3. and Table 6-2) and still meet the leachate head requirement of s. NR 504.06(1)(a), Wis. Adm. Code.*

Response:

Leachate head measurements are being performed monthly by Adams County personnel through the headwell risers and reported semiannually by submitting the results to the WDNR GEMS database in accordance with the Environmental Monitoring Tables from the Plan of Operation Approval dated February 14, 2019. The leachate head levels are collected with a water level meter and a fixed probe at the end. It is not clear why the head levels were reported with such a large range of values historically. Although past and recent leachate head elevations above 1 foot

were reported, the most recent results through September 2025 demonstrate that all but three headwells show less than one foot of leachate head on the liner. Head elevations at the remaining three headwells (LHW-5, LHW-9 and LHW-10A) are above one foot but have been reducing over recent months and nearing the one foot head on the liner target. It should be noted that there have been several changes in landfill leadership and consulting services since 2023 which have resulted in some lapses of leachate head monitoring, reporting, and management. Adams County has a greater understanding of the processes necessary to monitor, report, and manage leachate head on the liner. Adams County is committed to continuing to improve their operations related to leachate management moving forward.

e. *Clarify if MW-30 is an approved Subtitle D well. Section 8.7.1 of the feasibility report states that MW-7, MW-16, and MW-18 are the existing Subtitle D wells for the site.*

Response:

The Environmental Monitoring Tables from the Plan of Operation Approval dated February 14, 2019, list the active Subtitle D Monitoring Wells as MW-7, MW-16, MW-17 (to be abandoned), MW-18, and MW-30. Therefore, MW-30 is an approved Subtitle D Well and should have been included in the list of existing approved Subtitle D wells in Section 8.7.1.

f. *Clarify why preventive action limits (PALs) have not been calculated for well MW-9.*

Response:

The PAL and ACL Tables from the Plan of Operation Approval dated February 14, 2019 (Appendix A1), list the approved PALs for MW-9 and note that they were approved as part of the 2019 Plan of Operation for the Horizontal Expansion, which indicates that they have been calculated and approved by the Department.

g. *Provide a revised Table 6-5 from Appendix K that includes the preventive action limits (PALs) for wells MW-29, MW-30, MW-30P, and MW-31 that were approved in the department's February 14, 2019, plan of operation approval. The revised table should also indicate the PALs for those wells have been approved and are no longer waiting to be approved.*

Response:

The referenced Table 6-5 from Appendix K was not found within the 2023 FR submittal. The PAL and ACL Tables from the Plan of Operation Approval dated February 14, 2019 (Appendix A1) lists the approved PALs for MW-29, MW-30, MW-30P, and MW-31.

10. Proposed Preliminary Design [s. NR 512.14, Wis. Adm. Code]:

a. *Sections NR 512.13(3), NR 512.14(1)(a), and NR 512.16(2)(a), Wis. Adm. Code: Provide a revised materials balance calculation that specifies the types and quantities of soils needed to construct the final cap of the proposed vertical expansion. Also provide the specific types and quantities of soils available in the existing soil borrow source, the proposed soil borrow source, and the Phase 6 subbase excavation. It is not clear what types (clay, soil barrier layer material, topsoil, etc.) and quantities of soil are needed and how much material is available in each soil borrow source.*

Response:

Preliminary soil volume quantities and resulting soil balance calculations for the proposed Vertical Expansion are included as Table I1-3 in Appendix I1 of this Addendum No. 1. Phase 6 liner has already been constructed, and no on-site soil stockpiles exist as a result of the construction

activity. The currently permitted soil borrow source has an estimated 16,500 cubic yards of soil barrier layer material volume remaining in place. The phasing plans for final cover construction were revised and approved by the WDNR on July 17, 2025. A copy of the WDNR approval letter is provided in Appendix A1 of this Addendum No. 1. Approximately 10,650 cubic yards of soil barrier layer material is required to close the next planned final cover phase (3.3 acres in 2027).

Overall, there is a deficit of on-site general fill material currently available at the Site for the full closure of the proposed Vertical Expansion. A more detailed volume calculation for the required final cover soil materials and available source materials will be provided in the phasing and closure plan of the Plan of Operation for the proposed Vertical Expansion.

b. *Section NR 512.14(1)(b), Wis. Adm. Code: Provide leachate pipe strength calculations for the existing leachate collection lines below the proposed vertical expansion.*

Response:

The proposed Vertical Expansion will increase the static long-term loading of leachate collection pipes in the vertical overlay area. Preliminary pipe strength calculations were performed to evaluate worst case long-term static loading conditions due to the proposed Vertical Expansion on existing leachate collection pipes. The preliminary results indicate that the existing design and installed components of the leachate collection system remain adequate, with a factor of safety over 18. Appendix J1 of this Addendum No. 1 includes the preliminary calculations for the pipe strength analysis. An evaluation of pipe strengths and subbase consolidation will be provided in the Plan of Operation for the proposed Vertical Expansion. Because the proposed Vertical Expansion and associated waste depth increase only impacts the leachate collection lines within the overlay area, calculations for the leachate pipes beyond the overlay area are not warranted and therefore, not included. The assumptions made in the 1988 Plan of Operation (Phases 1-4) and the 2019 Horizontal Expansion Plan of Operation (Phases 5-6) have not changed as part of the proposed Vertical Expansion, and the existing leachate collection sumps and associated sump pipes do not need further evaluation in the Plan of Operation.

c. *Section NR 512.14(1)(c), Wis. Adm. Code: Provide a discussion on when Phase 6 will be constructed. Construction of Phase 6 is not discussed in the report, and the cap phasing plan sheet does not depict Phase 6 as being constructed.*

Response:

The Phase 6 liner was permitted as part of the Horizontal Expansion that was issued approval by the WDNR on February 14, 2019. At the time of the February 2023 FR submittal, the Phase 6 liner had not been construction yet. Construction activities for the Phase 6 Liner started on May 30, 2023, and were substantially completed on October 19, 2023. The WDNR issued a Construction Documentation Approval for the Phase 6 Liner on March 22, 2024 (Appendix A1).

d. *Section NR 512.14(1)(d), Wis. Adm. Code: Provide a sampling plan for all monitoring devices in accordance with s. NR 507.16, Wis. Adm. Code.*

Response:

A revised Sampling Plan is included in Appendix K1 of this Addendum No. 1 along with updated proposed Environmental Monitoring Plan summary tables (Table K1-1) and Site Map.

e. *Section NR 512.14(2)(a), Wis. Adm. Code: Verify that the entire leachate collection system and stormwater control features are depicted and defined on the existing conditions plan sheet (Plan Sheet 2).*

Response:

The existing leachate collection system and stormwater control features are depicted and defined on the revised existing conditions map (Plan Sheet 2R) provided in Appendix C1 of this Addendum No. 1.

f. *Clarify whether the proposed vertical expansion overlays Phase 6. The plan sheets depict the proposed vertical expansion overlaying Phases 2-6, but the majority of the feasibility report states the expansion would overlay Phases 2-5.*

Response:

At the time of the 2023 FR submittal, Phase 6 liner was permitted and approved under the horizontal expansion Plan of Operation, but had not yet constructed. The construction of this cell was completed, and the timeline of Phase 6 is discussed in the response to WDNR Comment 10.c and 10.g. The proposed Vertical Expansion does overlay Phase 6, as shown on Plan Sheet 2R. The proposed Vertical Expansion will overlay Phase 6 by approximately 0.3 acres.

g. *Clarify the following statement in Section 6.2 of the feasibility report: "Phase 6 has not yet been constructed but will be as part of the vertical expansion."*

Response:

Construction of the Phase 6 liner is not a part of the proposed Vertical Expansion. Phase 6 liner was permitted as part of the Horizontal Expansion approved by the WDNR on February 14, 2019. Construction activities for the Phase 6 liner started on May 30, 2023, and were substantially completed on October 19, 2023. The WDNR issued a Construction Documentation Approval for Phase 6 liner on March 22, 2024 (Appendix A1).

h. *Clarify the following statement in Section 8.3.4 of the feasibility report: "Drainage layer material within the proposed expansion will consist of material that has a hydraulic conductivity of at least 1 cm/s. A more permeable drainage media will better aid in preventing trapped areas of leachate." It is not clear if this statement is describing the liner below the proposed vertical expansion or material that would be added to the proposed vertical expansion.*

Response:

Section 8.3.4 (Leachate Recirculation) of the 2023 FR is under Section 8.3 (Leachate Control) which discussed the proposed preliminary design of the Leachate Collection System (LCS). The proposed Vertical Expansion will not modify the existing LCS at the base of the landfill. The quoted text is referring to the existing liner below the proposed Vertical Expansion.

i. *Clarify why the department's May 17, 1995, plan of operation approval modification is discussed in Section 8.7.1 of the feasibility report but the department's February 14, 2019, plan of operation approval is not discussed.*

Response:

The groundwater monitoring program will comply with the most recent February 14, 2019 Plan of Operation Approval until the proposed Vertical Expansion monitoring program is approved. The

reference to the May 17, 1995 in Section 8.7.1 was likely carried over from the 2018 FR for the horizontal expansion.

j. Clarify why a leachate treatment agreement with the city of Elroy is included in Appendix N but not discussed elsewhere in the feasibility report.

Response:

Leachate collected in the existing leachate storage tanks will be transported offsite to a WWTP. Treatment facilities that are or have previously been utilized were included in the 2023 FR. Currently, the City of Adams and Village of Plover WWTPs are available options for treatment. The City of Elroy was historically a treatment option, but Adams County no longer utilizes that facility for leachate treatment, and the leachate agreement for the City of Elroy as noted in WDNR Comment 10.j. shall be disregarded and shall not be included as part of this submittal. An acknowledgement letter for the continued acceptance of leachate from the Adams County Sanitary Landfill to the City of Adams WWTP is included in Appendix M1 of this Addendum No. 1 submittal.

k. Provide a discussion on the liner construction of Phases 3, 4, and 5, to show the liner meets the requirements of s. 504.095(1)(a), Wis. Adm. Code. Sections 1.1.2 and 8.3.4 of the feasibility report state that leachate recirculation would occur in the proposed vertical expansion over Phases 3, 4, and 5.

Response:

The proposed Vertical Expansion overlays liner Phases 3, 4, 5 and 6. The liner system consists of a composite liner designed and constructed in accordance with NR 504.06. The composite liner systems in Phases 3, 4, 5 and 6, consists of the following components from the bottom up:

- 4-foot compacted clay liner
- 60-mil HDPE geomembrane
- 12-oz. geotextile fabric
- 1-foot-thick washed stone granular drainage layer with hydraulic conductivity of 1 cm/sec or greater.

The WDNR has granted construction documentation approvals for these liner phases. Leachate recirculation, if implemented by the Site, will be utilized in accordance with an approved Leachate Recirculation Plan that is developed in accordance with NR 504.095. Though leachate recirculation is part of the approved permit, leachate recirculation has not commenced at the Adams County Sanitary Landfill to date.

11. Environmental Review [s. NR 512.16, Wis. Adm. Code]:

a. Section NR 512.16(2)(d), Wis. Adm. Code:

i. Provide a discussion of all emissions and discharges such as dust, engine exhaust, odors, noise, gases, leachate, storm water and collected groundwater associated with closure and post-closure of the proposed vertical expansion.

Response:

All landfills produce emissions and discharges. The landfill emissions and discharges expected from the proposed Vertical Expansion during operation and closure activities include the following:

Dust – Dust may be generated from the gravel access or haul roads, earthwork activities, and wind blowing across exposed areas. Dust quantity will vary depending on the number of vehicles or equipment in operation, weather conditions, and amount of exposed area. Dust will be controlled by applying water or commercial dust suppressants to access and haul roads during dry weather conditions, and establishing vegetation on completed, disturbed areas. A Dust Control Plan will be provided in the Plan of Operation for the proposed Vertical Expansion.

Engine Exhaust – Engine exhaust from diesel and gasoline-powered vehicles and equipment will be discharged to the atmosphere. The discharge volume will vary depending on the number of vehicles or equipment pieces in operation at a given time. Vehicle exhaust will be kept to a minimum by maintaining vehicles in good operating condition. No significant increase in vehicular traffic is expected during landfill operation over that which currently occurs with the existing facility.

Odors – The control of odors will be achieved by cover soil placement and by the installation of the gas collection and control system. An Odor Control Plan is currently in place for the existing landfill and will be updated in the Plan of Operation for the proposed Vertical Expansion.

Noise – Noise impacts associated with the proposed Vertical Expansion will occur from bulldozers, scrapers, and other earth moving equipment during final cover construction. During operation, noise will be generated by waste hauling trucks and landfill equipment. These will occur during the hours of operation and are not expected to increase over existing noise levels in the vicinity of the site. Hours of operation are determined in the local agreement with the host community and in meeting the concerns of the nearby residents.

Landfill Gas – Landfill gas (e.g., methane) from the decomposition of refuse materials will be generated during operation of the proposed Vertical Expansion. The chemical characteristics of the landfill gas are not expected to change. The proposed Vertical Expansion design overlies the existing composite liner and includes a cover system with an active gas extraction system. These controls will prevent significant subsurface gas migration from the existing Landfill and proposed Vertical Expansion. A network of gas monitoring probes have already been installed around the landfill to monitor for gas migration. Landfill gas generated by the proposed Vertical Expansion will be collected and burned in a flare. The gas collection and control systems will be permitted in accordance with the Title V construction and operating permit requirements.

Leachate – The proposed Vertical Expansion will utilize the existing leachate collection system. Leachate produced from decomposition of the waste and from precipitation infiltrating into the waste will flow through a highly permeable drainage blanket to collection lines which will transmit the flow to sumps at the lowest base elevation of each phase. From these sumps, the leachate will be pumped or gravity drained to leachate storage tanks and then conveyed by truck for disposal and treatment at an off-site WWTP. Leachate from the existing Landfill is routed and treated in this same manner. The quality and characteristics of the leachate are expected to remain similar to those of the leachate that is currently being collected at the Adams County Sanitary Landfill. Leachate generation is discussed under the WDNR Comment 8 of this Addendum No. 1.

Stormwater - A detailed surface water management plan and design will be incorporated in the Plan of Operation for the proposed Vertical Expansion and will be designed with the maximum stormwater discharge rates in mind (most conservative), which occurs under final cover conditions after the Landfill has ceased operation.

Groundwater – No groundwater will be collected other than during routine quality testing events. The risk of a leachate release through the liner to the groundwater will not increase as a result of the proposed Vertical Expansion. The potential for impacts to the groundwater from the Adams County Sanitary Landfill will be minimized by following NR 500 regulations and the sound solid waste management practices that include the use of a composite liner and cover system, and a leachate collection and management system.

Post-closure activities for the landfill will focus on continued environmental monitoring and maintenance to ensure long-term site stability and protection of surrounding resources. Emissions such as dust and odors will be minimized through the establishment and maintenance of vegetative cover and the ongoing operation of the landfill gas collection and control systems. Stormwater management systems will be maintained to control runoff under final cover conditions. Leachate generation will be monitored and managed through the existing leachate collection system. Noise and vehicle emissions will significantly decrease post-closure, with no active waste hauling or construction activities. Groundwater monitoring will continue, ensuring compliance with regulatory standards and the integrity of the composite liner and cover systems is maintained throughout the post-closure care period.

ii. *Provide a discussion on emissions and discharges that may be expected from removal of Phase 2 final cover. There are potential emissions and discharges associated with final cover removal and exposure of older waste from Phase 2.*

Response:

During the removal of final cover material, there is the potential for increased release of landfill gases, which may lead to temporary odor emissions. Odor management practices will be in place to address any temporary nuisance issues that may arise during the process. Additionally, disturbance of the waste and soil could generate dust, which will be managed to minimize any impact on the surrounding environment and workforce. A Dust and Odor Control Plan will be developed in the Plan of Operation for the proposed Vertical Expansion. Exposure of the waste to precipitation following cover removal may lead to an increase in leachate generation. This leachate is expected to contain typical constituents associated with the existing landfill waste and will be managed through existing containment and treatment systems to prevent any off-site impacts.

iii. *Provide a discussion on emissions and discharges that may be expected from the flare.*

Response:

Emissions and discharges from the flare are expected to be similar to existing conditions. The flare emissions and discharges currently comply with the Air Pollution Control Construction and Operation Permits issued by the WDNR on July 11, 2023. As part of the Plan of Operation, total gas generation for the proposed Vertical Expansion will be evaluated. New Air Pollution Control Construction and Operation permits will be obtained prior to construction of the proposed Vertical Expansion.

b. *Section NR 512.16(2)(f), Wis. Adm. Code: Provide a soils map that includes the area near the proposed vertical expansion and the proposed soil borrow area.*

Response:

Figure E1-2 provides a soils map and legend of the Adams County property that includes the Adams County Sanitary Landfill (proposed Vertical Expansion area within existing landfill limits) and existing and proposed soil borrow areas. This soils map was generated from the Web Soil Survey provided through the Natural Resources Conservation Services (NRCS) National Cooperative Soil Survey accessed online. Figure E1-2 is included in Appendix E1 of this Addendum No. 1.

c. *Section NR 512.16(3)(b), Wis. Adm. Code: Provide a description of the dominant aquatic and terrestrial plant and animal species and habitats found in the area near the proposed vertical expansion and soil borrow area that may be affected.*

Response:

The proposed Vertical Expansion will be constructed entirely within the existing Landfill footprint and will utilize existing site haul roads and active infrastructure for any future construction events. As a result, the proposed Vertical Expansion is not anticipated to adversely affect any aquatic or terrestrial plants, animal species, or habitats. The soil borrow source previously proposed in the 2023 FR is no longer being proposed for use and therefore, a response specific to that soil borrow area is no longer necessary. A description of the dominant aquatic and terrestrial plant and animal species and habitats found in the area near the proposed Vertical Expansion is provided below.

The natural habitat diversity around the Adams County Sanitary Landfill property is conducive to a wide variety of wildlife. Principal game species include white-tailed deer, ruffed grouse, woodcock, squirrels, rabbits, snowshoe hares, ducks, and geese. Muskrat, beaver, mink, otter, and coyotes are the primary furbearers. Numerous other protected species attracted to the area include sandhill cranes, great blue herons, eagles, hawks, owls, shorebirds, and songbirds. Wolves and black bears have also been observed intermittently on the property.

The existing Landfill and the proposed Vertical Expansion area are not known to be critical habitat areas for endangered or threatened species listed in Wisconsin Legislature Chapter NR 27. An Environmental Resources Review (ERR) was completed by the WDNR during the ISI process of the Horizontal Expansion and received the ERR response from the WDNR on July 23, 2014. The 2014 WDNR letter included two species with required actions, one species with recommended actions, and six species with no follow up actions. Ayres performed an Endangered Resources Surveys and Habitat Assessment on July 30, 2014 with subsequent documentation in a memorandum dated September 2, 2014 that satisfied the two required actions and one

recommended action. The survey revealed that the vegetation was not identified in the project area. Vegetation that was found on site during the Endangered Resources Surveys and Habitat Assessment included: white pine (*Pinus strobus)*, wild black cherry (*Prunus serotina*), black oak (*Quercus velutina*), red raspberry (*Rubus idaeus*), black-cap (*Rubus occidentalis*), common milkweed (*Asclepias syriaca*), white sage (*Artemisia ludoviciana*), lamb's-quarters (*Chenopodium album*), wild bergamot (*Monarda fistulosa*), and common spiderwort (*Tradescantia ohiensis*).

d. *Sections NR 512.16(3)(e) and NR 512.16(4)(e), Wis. Adm. Code: Clarify if any prime agricultural lands are located near the proposed vertical expansion and soil borrow area that may be affected by the proposed vertical expansion. Based on a web search, it appears a portion of the proposed soil borrow area is mapped as Delton sand, 0 to 2 percent slopes, which is classified as prime farmland. If this is the case, provide a discussion of the probable adverse and beneficial impacts.*

Response:

The proposed Vertical Expansion will be constructed entirely within the existing Landfill footprint. No disturbance or conversion of adjacent potential prime agricultural lands will occur. As a result, the proposed Vertical Expansion will not adversely affect any nearby prime farmland, consistent with the requirements of Sections NR 512.16(3)(e) and NR 512.16(4)(e), Wis. Adm. Code.

As discussed in the response to WDNR Comment 2.b., Adams County no longer plans to utilize the soil borrow source previously proposed in the 2023 FR. Therefore, a discussion in relation to the soil borrow source is no longer necessary.

e. *Section NR 512.16(4), Wis. Adm. Code: Provide a discussion of the probable impacts the proposed vertical expansion may have to nearby residents and the surrounding area, such as air quality, windblown debris, dust, visual impacts, noise, and other emissions and discharges. Greater emphasis should be given to the fact that, if the proposed vertical expansion is approved, waste would be placed to a higher elevation, and this may result in impacts beyond those from the existing landfill. This includes potential impacts from removal of Phase 2 final cover.*

Response:

The hills east of the Landfill will enable the site to blend into the surrounding topography after the proposed Vertical Expansion's closure. Large trees surrounding the Landfill, as well as the approximately 0.6 miles distance from the nearest public road (State Highway 21), will provide visual screening from most vantage points. Visual impacts are expected to be minimal.

Development of the proposed Vertical Expansion will take place on an existing landfill and property owned by Adams County, so its development will not require the displacement of residents, public land withdrawal, or condemnations. The proposed Vertical Expansion site is located on property with an active landfill, so it is consistent with existing land uses in the site vicinity.

Windblown debris will be controlled by proper landfill operational procedures including compaction and the placement of daily cover, the perimeter fencing, and the use of portable litter fencing in addition to hand picking operations. Waste delivery vehicles are required to prevent the discharge of waste. A Windblown Debris Control Plan will be prepared as part of the Plan of Operation for the proposed Vertical Expansion.

Temporary increases in fugitive dust levels could occur periodically due to site truck traffic traveling on existing unpaved road surfaces, but these emissions will be controlled in several ways. During dry periods, water or commercial dust suppressants will be utilized to mitigate

fugitive dust conditions that may occur. The quick establishment of vegetative cover on completed work areas of the proposed Vertical Expansion and the protection of any stockpiled soil will also reduce dust emissions. A Dust Control Plan will be provided in the Plan of Operation for the proposed Vertical Expansion.

The noise impacts from the proposed Vertical Expansion will be similar to those that occur from the existing Landfill. Potential noise impacts will be minimized through proper maintenance of landfill equipment. The remoteness of the site to residences and commercial businesses will also mitigate noise impacts.

No significant impacts on air resources are expected to occur due to the construction and operation of the proposed Vertical Expansion. The proposed Vertical Expansion design includes a cover system with an active gas extraction system along with the existing liner system of the Adams County Sanitary Landfill. These controls will prevent subsurface gas migration. Gas monitoring probes have already been installed around the landfill to monitor for gas migration. The extracted gas is combusted by flaring. Air quality will be monitored to comply with the Federal Title V regulations. A detailed landfill gas management system design will be included with the Plan of Operation for the proposed Vertical Expansion.

Further discussion on dust, air quality, odors, noise, visual impacts, and other emissions and discharges is provided in the response to WDNR Comment 11.a.i.

f. *Section NR 512.16(4)(f), Wis. Adm. Code: Provide a discussion on any loss of agricultural land and displacement of wildlife associated with the proposed vertical expansion and soil borrow area. Section 9.1 of the feasibility report indicates the proposed soil borrow area consists primarily of agricultural land, but the probable loss of agricultural land is not discussed as an environmental consequence. The regional and project location figures indicate a portion of the soil borrow area consists of woodland, but the probable displacement of wildlife is not discussed as an environmental consequence.*

Response:

The proposed Vertical Expansion will be constructed entirely within the existing Landfill footprint. No disturbance or conversion of adjacent potential prime agricultural land or woodlands will occur. As a result, the Vertical Expansion will not adversely affect any nearby prime farmland, woodland, or displace wildlife consistent with the requirements of Sections NR 512.16(3)(e), NR 512.16(4)(e), and Section NR 512.16(4)(f) Wis. Adm. Code.

As discussed in the above response to WDNR Comment 2.b., Adams County no longer plans to utilize the soil borrow source previously proposed in the 2023 FR. Therefore, a discussion in relation to the soil borrow source is no longer necessary.

g. *Clarify the following statement in Section 10.2.1 of the feasibility report: "Granular fill used in the liner leachate collection system will be obtained from an offsite source." The proposed vertical expansion doesn't involve a horizontal component of design or construction.*

Response:

Correct, the proposed Vertical Expansion does not include a horizontal component. When the 2023 FR was submitted, the Phase 6 liner had not yet been constructed. Granular fill used in the liner leachate collection system was obtained from an offsite source. Since there are no more phases of liner to be installed at the Adams County Sanitary Landfill, this item is no longer relevant.

h. *Clarify the following statement in Section 10.2.6 of the feasibility report: "The expansion will continue to use the three existing infiltration basins which were sized to meet the requirements of NR 151." The existing conditions plan sheet (Plan Sheet 2) depicts two basins: a detention pond west of Phase 1 and an infiltration pond north of Phase 5.*

Response:

At the time of the 2023 FR, there were two existing stormwater basins on site used for stormwater management. A third basin (South Infiltration Pond) was constructed with the Phase 6 liner and was subsequently approved by the WDNR in a letter dated March 22, 2024. The proposed Vertical Expansion will continue to utilize the three permitted (now existing) basins. All three basins are now shown on the revised Existing Conditions map (Plan Sheet 2R) in Appendix C1 of this Addendum No. 1. The size and capacity of these existing basins will be evaluated as part of the Plan of Operation for the proposed Vertical Expansion.

i. *Clarify the following statement in Section 10.3.1 of the feasibility report: "Large trees surrounding the Landfill, as well as the Landfill lying approximately 0.6 miles north of State Highway 21, will provide 10 from most vantage points." There appears to be a typo in the sentence.*

Response:

Correct, there was an error. A revised statement is below:

Large trees surrounding the Landfill, as well as the Landfill lying approximately 0.6 miles north of State Highway 21, will provide visual screening from most vantage points.

j. *Provide additional discussion in Section 10.3.5 of the feasibility report on air quality that may be affected by the proposed vertical expansion. The section states that air quality is expected to remain comparable to current conditions and the existing active gas system would be utilized to control emissions of hazardous air contaminants, but it is not clear what current conditions are or what hazardous air contaminants are being generated by the existing landfill.*

Response:

Constituents from the existing Adams County Sanitary Landfill and general operations that are potentially being emitted to the atmosphere include methane, carbon dioxide and monoxide, sulfur dioxide, nitrogen dioxide, and nonmethane organic compounds (NMOCs). The constituents are generated through the decomposition of organic refuse and the volatilization of organic compounds in the absence of oxygen and using operations equipment on site. The gas generated by the existing Adams County Sanitary Landfill is controlled by an active gas extraction system. The gas extracted from a network of gas extraction wells is presently combusted by an existing on-site flare. Site operations for the proposed Vertical Expansion will be consistent with current operations at the Adams County Sanitary Landfill disposal area.

The proposed Vertical Expansion will increase the length of time the Landfill is open and the amount of waste disposed within the Landfill. These changes will result in the generation of landfill gas for a longer period of time. The site will operate for an additional approximate 3 years (Table 11-9) if the proposed Vertical Expansion is approved and constructed. The increased waste volume associated with the proposed Vertical Expansion will add to the overall landfill gas generated from the site over the lifetime of the landfill. However, daily air emissions and concentrations are expected to remain relatively consistent with current conditions.

k. Clarify the year the existing landfill is expected to reach capacity, and the approximate year the existing landfill would reach capacity with the addition of the proposed vertical expansion. The projected years provided in Section 10.5 are not the same as provided elsewhere in the feasibility report (for example, Section 1.1.1).

Response:

The existing Landfill is expected to reach capacity in 2028, assuming current waste acceptance rates continue. Table 11-8 of the revised Needs Analysis in Appendix L1 summarizes the available disposal capacity, estimated disposal rate and calculated remaining years of disposal capacity of the existing Landfill.

The existing Landfill with the proposed Vertical Expansion is expected to reach capacity in 2031, assuming current waste acceptance rates continue, and the Vertical Expansion volume is added starting in 2026. Table 11-9 of the revised Needs Analysis in Appendix L1 summarizes the available disposal capacity, estimated disposal rate and calculated remaining years of disposal capacity of the existing Landfill with the proposed Vertical Expansion.

12. Need and Design Capacity [s. NR 512.17, Wis. Adm. Code]:

a. Provide a revised Table 11-1 that addresses the following:

i. Clarify the correct title of the third column. The column title indicates the column's values are July 2022 estimated site capacities, but the values appear to be January 2022 estimated site capacities based on the 2021 tonnage report. Also, footnote number 4 references a June 2021 estimate site capacity.

Response:

A revised Needs Analysis has been provided in Appendix L1 and replaces the tables and report text submitted to the WDNR in the February 2023 Feasibility Report. Items identified as incomplete by the WDNR have either been corrected with the revised Needs Analysis in Appendix L1 or are no longer relevant.

Table 11-4 of the revised Needs Analysis replaces the 2023 Table 11-1 referenced in the WDNR Comment 12.a. The revised Needs Analysis was based off the latest available and published data from the WDNR, which is currently the 2024 Landfill Tonnage Report. Estimated site capacities for Adams County Sanitary Landfill and the landfills within the Adams County service area are from the 2024 Landfill Tonnage Report and reflect the site capacity as of January 1, 2025. The estimated site capacity for Cranberry Creek Landfill was not included on the 2024 Landfill Tonnage Report so site personnel at the Cranberry Creek Landfill provided the data directly. The solid waste disposal capacity for the service area is provided on Table 11-4 of the revised Needs Analysis in Appendix L1.

ii. *Revise the January 2022 estimated site capacity for the Adams County Sanitary Landfill. The 2021 tonnage report indicates the January 2022 estimated site capacity for the Adams County Sanitary Landfill is 498,538 cubic yards (cy). To keep the needs calculations consistent, each landfill's estimated site capacity should be taken from the 2021 tonnage report; the site capacity of the Adams County Sanitary Landfill shouldn't be based off a July 2022 survey when the other landfill capacities are estimated capacities as of January 2022.*

Response:

The revised Needs Analysis was based off the latest available and published data from the WDNR which is currently the 2024 Landfill Tonnage Report. Estimated site capacities for the Adams County Sanitary Landfill and the landfills within the Adams County service area are from the 2024 Landfill Tonnage Report and reflect the site capacity as of January 1, 2025. The estimated site capacity of Adams County Sanitary Landfill as of January 1, 2025 was 250,320 cubic yards. The estimated site capacity for Cranberry Creek Landfill was not included on the 2024 Landfill Tonnage Report so site personnel at the Cranberry Creek Landfill provided the data directly. The solid waste disposal capacity for the service area is provided on Table 11-4 of the revised Needs Analysis in Appendix L1.

iii. *Clarify why the pending expansion capacities of the Monroe County landfill and the Dane County landfill are included in the table but do not appear to be included in the available service area capacity calculation. Per s. 289.28(1)(c)3, Wis. Stats., this information should be included in the calculation. These expansions were not discussed in Section 11.4.3 of the feasibility report either but must be.*

Response:

It was determined that Monroe County Landfill and Dane County Landfill do not share or overlap with the Adams County service area and, therefore, are not warranted to be included in the Needs Analysis for the proposed Vertical Expansion of the Adams County Sanitary Landfill.

iv. *Revise the estimated 2021 population of shared counties served for the Cranberry Creek, Valley Trail, and Dane County landfills, and the estimated 2021 population of all counties served for the Cranberry Creek and Valley Trail landfills using the 2021 population values provided in Table 11-1A. Also revise subsequent calculations affected by these revisions, such as the population weighted service area overlap percentage and available landfill capacity for the Adams County service area. Using the service areas provided in Section 11.2.2 of the feasibility report, the 2021 population values provided in Table 11-1A, and the other Table 11-1 revisions addressed above, the department calculates 1,611,182 cy of available landfill capacity for the Adams County service area as of January 2022.*

Response:

Table 11-4 of the revised Needs Analysis calculates 2,446,720 cubic yards of site capacity available for the Adams County Sanitary Landfill service area as of January 1, 2025. The revised Needs Analysis is based off the latest available and published data from the WDNR which is currently the 2024 Landfill Tonnage Report. Population data used to calculate percent overlap within the Adams County service area (shown on Table

11-4) was based on the 2025 population estimates prepared by the Wisconsin Department of Administration.

b. *Verify that the growth rate over the last five years in Table 11-2 is calculated correctly. The department calculates about a 14% growth rate over the last five years. Adjust the anticipated annual growth rate if necessary.*

Response:

A revised Needs Analysis has been provided in Appendix L1 and replaces the tables and report text submitted to the WDNR in the February 2023 Feasibility Report. Items identified as incomplete by the WDNR have either been corrected with the revised Needs Analysis in Appendix L1 or no longer relevant.

Table 11-3 of the revised Needs Analysis replaces the 2023 Table 11-2 referenced in the WDNR Comment 12.b. Historical waste tonnages for Adams County Sanitary Landfill were obtained from the WDNR Landfill Tonnage Reports for 2011 to 2024. An estimated volume consumed for each year was calculated using an assumed 1,500 lb/cy in-place waste density. An annual percent change was calculated for each year as well. An average annual percent change was calculated using the most recent five years of data (2020 – 2024) since it exhibited a somewhat stabilized data set. The average annual percent change calculated for 2020 – 2024 is 5%. Annual percent change calculated for 2018 and 2019 (29% and 39%, respectively), which were due primarily to a new hauling contract, would have skewed the average calculation much higher.

c. *Clarify how the annual growth rates are being calculated in Table 11-4, including the total annual growth rate. Revise Table 11-4 and the population growth rate value in Tables 11-6 and 11-7 if necessary.*

Response:

A revised Needs Analysis has been provided in Appendix L1 and replaces the tables and report text submitted to the WDNR in the February 2023 Feasibility Report. Items identified as incomplete by the WDNR have either been corrected with the revised Needs Analysis in Appendix L1 or no longer relevant.

Table 11-1 of the revised Needs Analysis calculates not only the per capita waste disposal rate (1.40 tons/capita/year) on a statewide basis but also an average percent growth rate for the State of Wisconsin (0.40%) for 2015 - 2024.

Table 11-2 of the revised Needs Analysis calculates the average percent growth rate of the Adams County service area (0.21%) from 2020 to 2025. The statewide average disposal rate (1.40 ton/capita/yr) as well as the average population growth rate for the service area (0.21%) were used to calculate an estimated waste disposal volume (539,502 cy) for 2025 on Table 11-2.

The estimated waste disposal volume for 2025 was then used along with the average service area population growth rate in Tables 11-6 and 11-7 to estimate the remaining years of disposal capacity in the service area without the proposed Vertical Expansion and with the proposed Vertical Expansion.

d. Provide a revised Table 11-5 that addresses the following:

i. The available waste disposal capacity in 2022 should be revised to reflect the January 2022 capacity estimate from the 2021 tonnage report. Beginning row one (year 2022) with mid-year capacity estimate is not appropriate when an annual volume of waste is being subtracted from that capacity estimate.

Response:

A revised Needs Analysis has been provided in Appendix L1 and replaces the tables and report text submitted to the WDNR in the February 2023 Feasibility Report. Items identified as incomplete by the WDNR have either been corrected with the revised Needs Analysis in Appendix L1 or no longer relevant.

Table 11-9 of the revised Needs Analysis replaces the 2023 Table 11-5 referenced in the WDNR Comment 12.d. Tables 11-8 and 11-9 provide the estimated site life of the Adams County Sanitary Landfill, with and without the proposed Vertical Expansion, respectively.

The available disposal capacity in 2025 (250,320 cy) reflects the available capacity as of January 1, 2025 listed in the 2024 Landfill Tonnage Report.

*ii. The annual volume of waste accepted in 2023 should reflect the average estimated volume consumed over the last three years (2020-2022), as shown in Table 11-2 and described in Section 11.5 of the feasibility report. The anticipated annual growth rate should be factored into the volume of waste accepted in 2023 as well. For example, the 2023 annual volume of waste accepted = 58, 856 cy * 1.08 = 63,564 cy. The annual volume of waste accepted in each subsequent year should then be calculated off this amount.*

Response:

The estimated disposal rate in 2025 (68,867 cy) used on Tables 11-8 and 11-9 is based on the total tons accepted at the Adams County Sanitary Landfill in 2024 (converted to cubic yards using the assumed 1,500 lb/cy in-place waste density) with the average annual waste acceptance rate change (5%) applied. The disposal rate for subsequent years utilize the prior years estimated disposal rate multiplied by the average annual waste acceptance rate change (5%).

The published 2024 waste accepted at Adams County Sanitary Landfill should be used for the 2025 volume consumed on Table 11-9 of the revised Needs Analysis rather than an average. As shown on Table 11-3, waste disposal rates have been increasing year over year since 2017 so to use an average of just the last five years (61,682 cy) would not align with the increasing trend and underrepresent the anticipated waste volume for 2025 and beyond.

iii. *The available waste disposal capacity for each year (other than 2022) should be calculated by subtracting the previous year's annual volume of waste accepted from the same year's available waste disposal capacity. For example, the 2023 available waste disposal capacity = 2022 available waste disposal capacity (498,538 cy) – 2022 annual volume of waste accepted (63,526 cy) = 435,012 cy. This method should also be used to calculate the available waste disposal capacity in the expansion only column (other than the initial value of 224,000 cy).*

Response:

Tables 11-8 and 11-9 of the revised Needs Analysis calculate the available disposal capacity for each year after 2025 by subtracting the previous year's estimated disposal rate from the previous year's available disposal capacity. However, once the estimated disposal rate is greater than the available disposal capacity, the following year's available disposal capacity equals zero instead of going negative.

iv. *Revise the annual waste growth, if necessary, based on revisions to Table 11-2 described above.*

Response:

Tables 11-8 and 11-9 of the revised Needs Analysis utilize the average annual waste acceptance rate change (5%) calculated on Table 11-3 of the revised Needs Analysis.

e. *Clarify why the anticipated annual waste growth rate is 8% in Tables 11-2 and 11-5, but Sections 11.3.1 and 11.5 of the feasibility report indicate an annual waste growth rate of 2% was used.*

Response:

A revised Needs Analysis has been provided in Appendix L1 and replaces the tables and report text submitted to the WDNR in the February 2023 Feasibility Report. Items identified as incomplete by the WDNR have either been corrected with the revised Needs Analysis in Appendix L1 or no longer relevant.

Table 11-3 and Table 11-9 of the revised Needs Analysis replaces the 2023 Table 11-2 and 2023 Table 11-5, respectively. An average annual waste acceptance rate change of 5% was applied to the annual estimated disposal rate on Tables 11-8 and 11-9.

f. *Verify that Table 11-6 and 11-7 begin with the correct year. Based on the 2021 tonnage report, Table 11-1 indicates the 1,829,697-cy available service area capacity is accurate as of January 2022. Revise Table 11-6 and 11-7 if necessary.*

Response:

A revised Needs Analysis has been provided in Appendix L1 and replaces the tables and report text submitted to the WDNR in the February 2023 Feasibility Report. Items identified as incomplete by the WDNR have either been corrected with the revised Needs Analysis in Appendix L1 or no longer relevant.

Tables 11-6 and 11-7 of the revised Needs Analysis replace the 2023 Tables 11-6 and 11-7. The available waste disposal capacity in 2025 for the service area (2,446,720 cy) is based on the 2024 Landfill Tonnage Report information and/or additional sources of information where data was not included on the 2024 Landfill Tonnage Report. Table 11-4 of the revised Needs Analysis summarizes the total waste capacity of landfills within the Adams County Sanitary Landfill service area as of January 1, 2025.

g. *Provide any other revisions to Tables 11-1 through 11-7 or related discussion in the feasibility report affected by the above items.*

Response:

A revised Needs Analysis has been provided in Appendix L1 and replaces the tables and report text submitted to the WDNR in the February 2023 Feasibility Report. Items identified as incomplete by the WDNR have either been corrected with the revised Needs Analysis in Appendix L1 or no longer relevant.

h. *Provide the correct link to the tipping fee pdf referenced in Section 11.2.1 of the feasibility report. The current link does not work.*

Response:

A revised Needs Analysis has been provided in Appendix L1 and replaces the tables and report text submitted to the WDNR in the February 2023 Feasibility Report. Items identified as incomplete by the WDNR have either been corrected with the revised Needs Analysis in Appendix L1 or no longer relevant.

An updated link to the 2019 tipping fee pdf has been provided in Section 11.2.1.1 of the revised Needs Analysis in Appendix L1. The document is titled, “Posted Gate Landfill Tip Fees for Municipal Solid Waste (MSW) in Wisconsin and Surrounding Counties, 2019 Update” and was published by the WDNR on June 20, 2019. The website link is https://dnr.wisconsin.gov/sites/default/files/topic/Landfills/lftipfees.pdf.

2.2 PART B. ADDITIONAL INFORMATION REQUIRED FOR A FEASIBILITY DETERMINATION

1. *Please be aware, revisions/amendments to the Storm Water Pollution Prevention Plan (SWPPP) may be necessary for the proposed vertical expansion and soil borrow area. Please contact the Storm Water Program.*

Response:

An application to update the Adams County Sanitary Landfill WPDES General Permit to include the proposed Vertical Expansion will be evaluated as part of the Plan of Operation when a more detailed stormwater management design is completed. An updated SWPPP with be submitted with the Plan of Operation for the proposed Vertical Expansion.

2. *Please be aware, a new air permit and/or permit revision from the air management program is necessary for the proposed vertical expansion. Please contact the Air Management Program.*

Response:

Air monitoring of the Adams County Sanitary Landfill will continue in accordance with the current Air Pollution Control Operation Permit (Permit No. 701040560-S02). A construction and operation air permit will be prepared and submitted under separate cover to the WDNR Bureau of Air Management concurrently with the Plan of Operation for the proposed Vertical Expansion.

3. *The proposed southeast infiltration basin is located adjacent to well MW-31 and the potential effects of the infiltration on the monitoring results are not known. If grades are changed, it may be necessary to extend the well and casing (and resurvey the elevations to allow for accurate groundwater monitoring).*

   Response:

   The southeast infiltration basin was permitted and approved as part of the 2019 Horizontal Expansion and was subsequently constructed during the Phase 6 liner installation, which received WDNR approval on March 22, 2024. Monitoring well MW-31 is positioned side-gradient to the existing southeast infiltration basin, and the surrounding grades near the well remained unchanged following the basin's construction. Therefore, it is unlikely that the infiltration basin construction has had any impact on MW-31.

4. *The Village of Plover leachate agreement included in Appendix N runs through May 2023. Please provide an update on whether this agreement is being renewed and, if so, what the status is.*

   Response:

   The Village of Plover leachate treatment agreement has expired and has not been renewed. The Village of Plover does continue to accept up to one haul truck load of leachate from Adams County each day. The City of Adams continues to accept leachate from Adams County Sanitary Landfill for treatment and disposal at the City of Adams WWTP. A letter from the City of Adams WWTP is included in Appendix M1 of this Addendum No. 1.

5. *Gas probe GP-4 is not located on the Monitoring plan sheet (Plan Sheet 25). GP-4 would need to be depicted on the long-term care plan sheet required in the plan of operation.*

   Response:

   Gas probe GP-4 is included on the revised Existing Conditions map (Plan Sheet 2R) and the revised Environmental Monitoring Plan (Plan Sheet 25R). Revised drawings are provided in Appendix C1 of this Addendum No. 1.

3.0 RECOMMENDATION

Adams County believes that the responses presented in this Addendum No. 1 satisfactorily address the additional information requested by the WDNR in their Incompleteness Letter dated April 14, 2023. The contents of this document allow the WDNR to complete the remaining portions of the feasibility review process in a timely manner to issue a completeness determination, and will allow for a future feasibility determination.

4.0 LIMITATIONS

The work product included in the attached was undertaken in full conformity with generally accepted professional consulting principles and practices and to the fullest extent as allowed by law we expressly disclaim all warranties, express or implied, including warranties of merchantability or fitness for a particular purpose. The work product was completed in full conformity with the contract with our client and this document is solely for the use and reliance of our client (unless previously agreed upon that a third party could rely on the work product) and any reliance on this work product by an unapproved outside party is at such party's risk.

The work product herein (including opinions, conclusions, suggestions, etc.) was prepared based on the situations and circumstances as found at the time, location, scope and goal of our performance and thus should be relied upon and used by our client recognizing these considerations and limitations. Cornerstone Environmental Group, LLC - A Tetra Tech Company shall not be liable for the consequences of any change in environmental standards, practices, or regulations following the completion of our work and there is no warrant to the veracity of information provided by third parties, or the partial utilization of this work product.