TETRA TECH

Emerald Park Landfill

Proposed Western Expansion Feasibility Report - Addendum No. 1

September 2023

TETRA TECH

September 19, 2023

Ms. Ann Bekta
Wisconsin Department of Natural Resources
2514 Morse Street
Janesville, WI 53545

Re: Emerald Park Landfill, LLC Proposed Western Expansion Feasibility Report Addendum No. 1
(Lic. No. 03290)

Dear: Ms. Bekta

Cornerstone Environmental Group, LLC a Tetra Tech Company (Tetra Tech), on behalf of Emerald Park Landfill, LLC (EPL) is providing this response to the letter from the Wisconsin Department of Natural Resources (WDNR) dated April 1, 2014 titled "Completeness Determination for the EPL Proposed Western Expansion Feasibility Report (Lic. No. 3290) (Attachment 1). The Report dated January 2, 2014 was prepared by Cornerstone Environmental Group, LLC a Tetra Tech Company (Tetra Tech), on behalf of EPL and was received by the WDNR on January 2, 2014.

Based on the April 2014 WDNR Letter, we have prepared and/or provided the additional information requested by the WDNR to allow for a feasibility determination. The remainder of this letter is divided into two sections as defined in the WDNR April 2014 Letter. Part A contains our response to the additional information requested for a Feasibility Determination and Part B contains our response to additional items for EPL to consider. WDNR comments are shown in Italics with a response following each comment.

Part A - Additional Information Needed in Order to Make a Feasibility Determination:

1. ***Wetlands and Navigable Waters – Individual Wetland Permit and wetland functional values assessment:***

   An individual wetland permit in accordance with s. 281.36, Stats. and a wetland functional values assessment in accordance with s. NR 103.08 (4) 3, Wis. Adm. Code will be needed. Below is a summary of what is required and the procedural process.

   Background: The proposal calls for eliminating approximately 12.9 acres of wetland (wetlands W-9 & W-12). Section 281.36, stats. supersedes the procedural requirements and the practicable alternatives analysis(PAA) requirements of ch. NR 103.08 (3) (b), Wis. Adm. Code. However, the functional values assessment requirements of NR 103.08 (4) 3, Wis. Adm. Code remain in effect.

   What needs to be included in the wetland permit application:

   WDNR Comment: *a PAA that includes an evaluation, drawings if applicable, and cost analysis of the following options:*
   - *Expanding on the Future Parkland property to the north*
   - *An expansion that avoids or minimizes wetland impacts, such as W-12*

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Response: Expanding North into the Future Parkland property is evaluated in Section 4.3 of the practicable alternative analysis (PAA) that was completed as part of the February 27, 2023 WDNR wetland and waterway permit application. Expanding to the North was addressed in more detail as part of the response to the WDNR request for information received by Tetra Tech on March 29,2023 and additional comments received on May 18, 2023. The WDNR Additional Information Requests and The Response Letter dated June 6, 2023 are included in Attachment 2.

Wetland 12 was re-delineated in 2015 and again in 2021 and has been renumbered as W1. To meet the project goals, impacts to wetland W1 are unavoidable. During the wetland permitting process the WNDR and US Army Corp of Engineers (USACE), both requested an evaluation to reduce impacts to W1. Following the evaluation, the limits of disturbance of the Proposed Western Expansion were adjusted to reduce impacts to wetlands. The overall wetland acreage impacts were reduced by 1.6 acres, including a portion of wetland W1 as explained and shown in the June 2, 2023 Additional Information Response to the USACE (Attachment 2) and the June 6, 2023 Additional Information Response to the WDNR (Attachment 2).

WDNR Comment: *a proposed wetland mitigation plan.*

Response: EPL will use credits from its approved Wetland Mitigation Bank which contains 41.9 wetland bank credits that were released on February 16, 2023. The EPL wetland bank is located approximately 600ft away from the project area within the same watershed and has sufficient credits available to mitigate the proposed wetland impacts. See Attachment 4 for US Army Corp of Engineers Regulatory In-lieu Fee and Bank Information Tracking System Wetland Bank Printout demonstrating the EPL wetland bank credit availability and the Affidavit of Wetland Credit Purchase Dated August 23, 2023.

WDNR Comment: *an amended plan sheet 30 delineating the anticipated extent of wetland impacts along the landfill perimeter berm and service road and showing the approximate location of wetland protection barriers, such as silt fence, boulders, etc. This wetland impacted area beyond the limits of waste, which includes the perimeter berm, service road and any equipment access corridor, beyond perimeter berm and road needed to construct perimeter berm and road, needs to be included in the total number wetland acreage to be impacted.*

Response: An updated plan sheet indicating the limits of disturbance around the proposed landfill including roads, berms, or other supporting features that may require wetland fill (Attachment 3). EPL proposes to place wetland protection barriers such as “Wetland Protection Area” signs, silt fence or boulders as needed along the limits of disturbance during each phase of construction. These wetland protection items will be further defined as part of the Plan of Operation and Storm Water Pollution Prevention Plans.

WDNR Comment: *an assessment of wetland impacts that would be caused from changes to the surface water drainage patterns. The application should include a water balance evaluation to show which wetlands would experience an increase in surface water flow and which wetlands may experience decrease. It should also evaluate if any increases or decreases will have a significant effect. This should include wetlands 4, 10, 11, and the remaining parts of wetlands 9 and 12.*

Response: Tetra Tech prepared a preliminary watershed boundary assessment and sedimentation basin design that will result in no measurable impacts to wetlands (see Attachment 5). Further stormwater evaluation and design will be completed as part of the Plan of Operation.

WDNR Comment: *The wetland permit application should address what appears to be a perceived discrepancy between number of acres of wetland proposed to be filled in the 2014 feasibility report (12.9) and the number of remaining acres from the 2009 feasibility report (13.49) which amounts to an approximate difference of 0.59 acres:*

14.3 (2009 acres requested to fill) – 0.812 (2009 acres approved to fill for W-6, W-6a & W-7) = 13.49 acres.

Response: The wetlands adjacent to the proposed expansion have been re-delineated twice since 2014 and the design of the proposed expansion has been adjusted as part of the wetland permitting process to reduce wetland impacts. The amount of wetland impacts for the Proposed Western Expansion are 14.81 acres and are shown on a figure included in Attachment 3.

WDNR Comment: *Timing: Contrary to our discussions on October 7, 2013, we have determined that a wetland permit would need to be obtained at about the same time as the feasibility determination. The reason for this is because the feasibility determination needs to demonstrate that the performance standard of NR 504.04 (4) (a), Wis. Adm. Code is met and the Plan of Operation needs to establish the approved landfill footprint and design. A delay in issuing a wetland permit until after the Plan of Operation Approval would create an uncertainty in the approved limits of waste and landfill design.*

We ask that the wetland permit application be submitted at such time that a wetland permit determination can be made at about the same time as the feasibility determination. We will notify Advanced of the optimal time to submit the wetland permit application.

Response: The wetland and waterway permit applications were approved by the WDNR on August 28, 2023, both approval letters are included in Attachment 6.

WDNR Comment: *Procedural Process: This spring, during the growing season, Advanced will need to re-delineate the wetlands for department and Army Corps of Engineers (ACOE) concurrence and the department will need to do a wetland functional values assessment. After Advanced re-delineates the wetland boundaries, Advanced will need to submit the wetland delineation report to the department. Department staff will then arrange to do a site visit with Advanced and ACOE to conduct a delineation concurrence. Advanced should have the wetland boundaries flagged at the time of the site visit. Department staff will also conduct a wetland functional values assessment and will reassess the navigability of the ditches. This includes ditches D2, D3 and D4 and any other potential ditches in the proposed project area.*

Response: Wetlands were delineated by Stantec with WDNR and USACOE confirmation letters issued in June of 2015. The WDNR confirmation expired and was reconfirmed by Tetra Tech in September 2021. WRAM and WDNR site visit were completed in September 2021. EPL submitted a Wetland Delineation Addendum to the WDNR in November 2021 confirming the existing wetland boundaries. The WDNR issued a Wetland Delineation Report Confirmation Letter dated January 14, 2022 that reconfirmed the 2015 wetland boundaries (Attachment 7). The navigability of the agricultural ditches was determined in September 2014 as indicated in the Memorandum included in Attachment 8.

2. *Final Cover Design:*

WDNR Comment: *Please provide a clarification of the final cover design, including a revised narrative contained on pages 9-4 and 9-5 of the 2013 feasibility report and additional cross-sectional details.*

Response: The proposed expansion final cover system is designed with two options as shown on Plan Sheet 33 of the original Western Expansion Feasibility Plan Set. The two cover systems are in conformance with NR 504.07 and are to cover separate areas. Option A covers the Phase 8A and Phase 8B closure sequences, and option B covers the Phase 9 closure sequence as illustrated in Plan Sheet 30 of the original Western Expansion Feasibility Plan Set. The options are outlined in the table below:

Final Cover Composition

Option A Final Cover	Option B Final Cover
• 6-inch Topsoil Layer	• 6-inch Topsoil Layer

• 78-inch Rooting Zone Layer • Double-sided Geocomposite • 40 mil Textured LLDPE Geomembrane • 24-inch Clay Layer • 6-inch Grading Layer or Intermediate Cover	• 30-inch Rooting Zone Layer • Double-sided Geocomposite • 40 mil Textured LLDPE Geomembrane • 24-inch Clay Layer • 6-inch Grading Layer Intermediate Cover

Top of waste grades will be a uniform 4H:1V slope for closure sequences of Phases 8A, 8B and 9. At an offset of 15.5 feet from the limits of waste, the final cover will have a transition slope, option A placed at a 2H:1V slope and Option B placed at a 2.5H:1V slope as shown in Plan Sheet 33. The transition slope achieves final cover composition thicknesses, as identified in the table above, prior to reaching the limits of waste. From the limits of waste, the landfill's final cover surface will grade break to a 4H:1V slope within the limits of waste. At the crest the final cover, the rooting zone from Phase 8A and 8B will be blended into Phase 9 with a minimum slope of 10% to tie-in each sequence phase for proper stormwater drainage.

Material compaction specifications for the final cover will be similar to previous construction specifications and all materials to be further evaluated in the Plan of Operation. The geosynthetics within the final cover outside the limits of waste will be formed as a swale for stormwater infiltration to drain out of the final cover system. The stormwater infiltration is to be conveyed by perforated toe drain pipe to a stormwater system outside the final cover system and beyond the perimeter road. The final cover will be seeded and mulched as soon as possible after placement to establish vegetation over the final cover and to minimize erosion. An updated Plan Sheets 30 and Plan Sheet 33 can be found in Attachment 9.

WDNR Comment: *It appears from the 8.5 foot thickness description on page 9-5 of the 2013 feasibility report, that geomembrane and the geonet composite drainage layers will be placed only on the 3:1 slopes. In addition,the second and third sentences highlighted in yellow on page 9-4 are not clear. It's not clear if only certain portions of phases 8 and 9 will have the increased cover thickness and where those sections are. It is also not clear from the detail on plan sheet 33 and narrative how the final cover ties in with the peak and transitions to the 10% slope.*

Response: Please refer to Attachment 8 for the final cover composition and thicknesses. The geocomposite layer is to be provided throughout the final cover system for each closure sequence. Phases 8A and Phase 8B will have the option A final cover system, as illustrated in Plan sheet 30, as the increased thickness of 9 feet from top of the grading layer. Phase 9 will have the option B final cover system with a thickness of 5 feet from top of grading layer. At the crest the final cover, the rooting zone from Phase 8A and 8B will be blended into Phase 9 with a minimum slope of 10% to tie-in each sequence phase for proper stormwater drainage.

Part B: Other Feasibility Determination items that Advanced Disposal should be aware of

1. *Needs & Site Life:*

WDNR Comment: *Needs: Our needs analysis shows that there are about 9 years of capacity remaining in the EPLservice area. A general rule of thumb is if there are less than 7 years of service area capacity remaining, then there is a need for the expansion because it can take 5 to 7 years to site a new landfill. Therefore, EPL falls just outside of the 7-year window in 2014; however, starting in 2015 EPL would be in that window. By the time EPL would begin construction in the expansion area (2015 or after), it appears that there would be a need for the proposed facility.*

Response: A need analysis for EPL was completed with information from the 2022 WDNR Waste Tonnage Capacity Report. This analysis is provided in Attachment 10. Table 11-4 shows that there are approximately six years of capacity remaining in the EPL service area without the proposed Western Expansion.

WDNR Comment: *Site Life: Our site-life calculations show a 22-to-23-year site-life without the city of Milwaukee contract and an 11-year site-life with the city of Milwaukee contract. In order to be compliant with s.289.29 (1) (d), Stats., which limits the landfill capacity to meet an expected site-life to be within 15 years, the feasibility determination will condition that the plan of operation report adjust the landfill capacity and footprint to meet this requirement. The plan of operation report should be submitted after the city of Milwaukee waste contract bidding occurs.*

Response: Updated site-life calculations based on recent filling rates, indicates that approximately nine years of site-life will be added from the proposed Western Expansion. Filling of the expansion area is anticipated begin 2030, as shown on Table 11-9 of Attachment 10.

WDNR Comment: *Our calculations used a couple of different values than the feasibility report used. Below are the differences:*

i. ***WDNR Comment:*** *State-wide per capita waste generation rate: The feasibility report used 9.6 lbs./cap/day, which is an average of the state-wide generation rate for the years 2003 through 2012. We used 8.0 lbs./cap/day because that is what the calculated value has been for the most recent three years. Since the per-capita waste generation rate has been declining or holding steady, we do not believe it is valid to average in older, higher rates.*

Response: The per-capita waste disposal rate used in the updated needs analysis is 7.89 lbs./cap/day and represents the average Wisconsin waste disposal rate per capita for the last five years (2018 to 2022).

ii. ***WDNR Comment:*** *The contribution of waste generated per county to the service area: The feasibility report uses a percentage of available landfill capacity for those landfills located in overlapping service areas. For example, the report states that only 19% of the remaining capacity at the Deer Track Park Landfill is available to the EPL service area. However, the report also uses the entire population of Jefferson County in its waste generation calculations for the service area. Our calculations use a weighted population consistent with the available landfill capacity for the landfill that is located in that county. For those counties such as Ozaukee that do not have a landfill, we give EPL the benefit of the doubt and count all of its population.*

This is done in order to be consistent with the percentage of landfill capacity available in the service area. If only a percentage of the remaining landfill capacity of the landfill(s) located in those counties is going to be counted for the service area, then only that same percentage of waste generated in those counties by population should be counted. Otherwise, the waste generation is over estimated.

Response: The statewide waste disposal rate is used along with the most recent county population data to calculate waste disposal rates within the service area. This is common practice and provides the most accurate snapshot of waste disposal rate in the service area as waste contracts are fluid. It is impractical in most case to try and determine where citizens and industries located within a specific region or city of a county send their waste.

2. ***Storm Water Runoff Management:***

WDNR Comment: *The proposed storm water infrastructure presented in the feasibility report is designed primarily to achieve the standards contained in s. NR 504.09, Wis. Adm. Code. As we discussed during the 2009 feasibility review, the current s. NR 504.09, Wis. Adm. Code, standards may no longer meet the storm water control standards contained in chs. NR 216 and NR 151, Wis. Adm. Code. A favorable feasibility determination may condition that the plan of operation report contains an evaluation of the ch. NR 151 storm water design, provided in the Technical Standards, compared to the NR 504.09 storm water design. NR 151 performance*

standards generally include:

A. Sedimentation Basin Design:
Sedimentation basins designed with a permanent pool and outlet release to settle 80% of Total Suspended Solids (TSS) through the active life of the landfill. The WDNR's 80% TSS control standard is based on an annual average storm series

The Department's Construction Site Erosion & Sediment Control Standards can be used to achieve the goal of 80% TSS. The standards are accessible at http://dnr.wi.gov/topic/stormwater/standards/const_standards.html

Specifically, the Sediment Basin standards that could be an appropriate application for this project are located at http://dnr.wi.gov/topic/stormwater/documents/SedimentBasin_1064.pdf and http://dnr.wi.gov/topic/stormwater/documents/WetPondStd1001.pdf

Response: Emerald Park will utilize stormwater modeling programs which have been approved by the department to provide a justification of how the proposed stormwater design will fulfill the requirements of Technical Standards 1001 & 1064, Chapters NR 151.122 & NR 151.123, and NR 504.09 and how a relative water balance to the receiving wetlands compared to pre-development conditions shall be met in the Plan of Operation.

A short summary of how those requirements shall be met is presented below:

- Temporary and permanent stormwater control features shall be designed such that there is no increase in peak runoff discharge rates for 1-year, 2-year, 10-year and 100-year 24-hour storm events from pre-development conditions (NR 151.123 and Waukesha County Ordnances Chapter 14, Article VIII, Section 14-341(d)).
    - Tetra Tech will model the pre-development conditions of the proposed development up to the limits of disturbance to determine existing runoff rates from the site at each outfall location.
    - Control features shall be designed to maintain or reduce runoff discharge rates for 100-year, 24-hour storms in order to be conservative.
- As part of the Plan of Operation, Tetra Tech shall demonstrate that the proposed design will provide an approximate pre-versus post-development balance in surface water runoff volume and peak discharge rates for storm durations (1-year, 2-year, 10-year, 25-year and 100-year 24-hour events) to the wetland locations to the west of the proposed expansion.
- Ponds shall have an emergency spillway designed to safely pass peak flows produced by a 100-year, 24- hour storm event (Tech. Std. 1001).
    - Spillways shall be designed to safely pass the peak flows produced by a 100-year, 24-hour storm event which is more conservative than the 25-year, time of concentration storm stipulated in NR 504.09(1€).
    - The 25-year, 24-hour storm will be contained by all stormwater basins.
- Best Management Practices (BMPs) shall be designed, installed, and maintained to settle at least 80% of total suspended solids (TSS) (NR 151.122).
    - Detention ponds shall be designed in accordance with Standard 1001, which deems them at minimum 80% (settling particles up to the 3 microns) effective by design in trapping the dominant soil entering the basin.
- Permanent sediment control measures shall be designed to settle 0.015 mm size

particles up to and including the 25-year, 6-hour storm.

B. *Erosion Control*

WDNR Comment: *Locations of concentrated flow areas with a shear stress of 0.6 pounds per square foot (psf.) or greater should receive appropriate erosion matting or other erosion stabilization. Concentrated flow areas with 5 feet per second (fps) or greater velocities should receive some form of permanent erosion stabilization such as a turf reinforcement mat or riprap. Please evaluate whether the swale/channelized flow down the basin slopes would be given rip rap or other permanent stabilization to keep the basin slope stable from erosion and include permanent protection as appropriate at such locations. Other erosion control measures may also be required through the operational life of the landfill.*

Response: Flow areas will be assessed for erosion control matting utilizing the slope and channel matrices which can be found on the Wisconsin DOT website at: https://wisconsindot.gov/rdwy/fdm/fd-10-05-att.pdf and the erosion mats technical standards available at https://dnr.wisconsin.gov/topic/Stormwater/standards/const_standards.html. Below is a table that points out the general differences between NR 504.09 and Technical Standards 1064&1001:

NR 504.09	Tech Standard 1064	Tech Standard 1001
25 yr. – 6 hr. time of concentration storm event	1 yr. – 24 hr. time of concentration storm event	2 yr. – 24 hr. time of concentration storm event
Particle Size: 15 mm (loam, silt & silty loam)	80% TSS Control based on dominant soil entering basin	80% TSS Control based on dominant soil entering basin
Emergency Spillway: 100-yr storm event	Emergency Spillway: 10 yr. – 24 hr. storm event	Emergency Spillway: 100 yr. – 24 hr. storm event
Dry Sed Basin	Wet Sed. Basin	Wet Sed. Basin

3. ***NR 140 Preventative Action Limits (PALs), Alternative Concentration Limits (ACLs) and Well Status:***

WDNR Comment: *Remaining PALs and ACLs needed for existing monitoring wells: There were some wells for which indicator parameters could not be calculated for the June 9, 2011 Plan of Operation approval because some of the baseline data did not meet all of the quality control flags. Additional baseline data was needed to have the minimum eight sample rounds to calculate PALs. A favorable feasibility determination may condition that the plan of operation report include proposed calculated PALs for those indicator parameters and wells.*

In addition, a favorable feasibility determination may require new baseline groundwater sampling for arsenic because the NR140 arsenic PAL and enforcement standard (ES) were lowered since the original baseline sampling conducted at the site's monitoring wells in the 1990s. The older arsenic baseline sample data used a higher laboratory limit of detection, than the current NR 140 PAL.

Response: A response to this comment was initially addressed in a Groundwater Monitoring Plan Modification prepared by Environmental Sampling Corp. dated October 11, 2016 (Attachment 11). The WDNR subsequently responded to the 2016 Groundwater Monitoring Plan Modification with a Request for Additional Information Letter, dated August 29, 2022 (Attachment 12). The 2022 WDNR Letter

requested additional information on several remaining PAL, ACL and/or arsenic topics. EPL will respond to the Request for Additional Information Letter dated August 29, 2022 as part of the Plan of Operation. The response or submittal within the Plan of Operation will include a summary of the previously approved PALs and ACLs and supporting documentation for the remaining proposed PALs and/or ACLs as requested in the August 29, 2022 Letter.

WDNR Comment: *There appear to remain some discrepancies between the department's GEMS data base and information contained in the feasibility report regarding well status for some of the older wells, such as MW-19A, MW-109A and MW-120D. A favorable feasibility determination may require that the plan of operation report include an updated comprehensive well information form (WIF) for the whole site, copies of well abandonment forms for some previously abandoned wells and well construction reports for any replacement wells.*

Response: An updated comprehensive Groundwater Monitoring and Point Information Form (GMPI) has been completed for the EPL groundwater monitoring well network and is provided in Attachment 13. This GMPI addresses the noted discrepancies. Any missing abandonment forms and well construction reports may be transmitted during the Plan of Operation, if they are located.

WDNR Comment: *Abandonment of private wells PW-10 and PW-11: A favorable feasibility determination may condition additional abandonment procedures for private wells PW-10 and PW-11 than the minimum abandonment requirements contained in ch. NR 812, Wis. Adm. Code. Because these two private wells are located in an area of future landfill construction, the department may require that the well casings be perforated so that sealing grout can be pumped into any cavities or voids in the annular space or surrounding formation. This may provide an improved seal and better protection to the groundwater.*

Response: Both PW-10 and PW-11 were abandoned by Sam's Well Drilling on August 21, 2017, the well casings were perforated, and the sealing grout was pumped/injected into the perforated casing. The abandonment logs and a geophysical study of the wells are provided in Attachment 14.

WDNR Comment: *Navigable Ditches and Fish: A favorable feasibility determination or plan of operation approval may require that a fish survey be done in the navigable ditches before they are impacted to determine if any fish are present at the time and if so, an evaluation to mitigate or minimize any impacts to fish.*

Response: The realignment of a navigable drainage ditch is required because it is located within the proposed limits of waste. As part of the permit approval process for realigning this waterway, potential impacts to fish and other wildlife were reviewed by the WDNR. The wetland and waterway permit applications (including the navigable ditch relocation) were both approved by the WDNR on August 28, 2023.

Sincerely,

CORNERSTONE ENVIRONMENTAL GROUP, LLC – A TETRA TECH COMPANY

Mark J. Torresani, PE
Vice President

Luke Specketer, PG
Project Manager

Enclosure:

Attachment 1 – Completeness Determination for the EPL Proposed Western Expansion Feasibility Report Letter, April 1, 2014

Attachment 2 – Emerald Park Landfill Northern Expansion Wetland Practicable Alternatives Analysis (Revised)

Attachment 3 – Proposed Western Expansion Plan Sheet (Revised)

Attachment 4 – US Army Corp of Engineers Regulatory In-lieu Fee and Bank Information Tracking System Wetland Bank Printout and Wetland Credit Affidavit

Attachment 5 – Preliminary Watershed Boundary and Stormwater Basin Design Plan Sheet

Attachment 6 – Wetland and Waterway Permit Approvals August 28, 2023

Attachment 7 – EPL Western Expansion Wetland Confirmation Letter, January 14, 2022

Attachment 8 – Drainage Ditch Navigability Determination, September 23, 2014

Attachment 9 – Final Cover Plan sheet and Details (Plan Sheets 30 and 33)

Attachment 10 – Needs Analysis Tables

Attachment 11 – Groundwater Monitoring Plan Modification, October 11, 2016

Attachment 12 – Request for Additional Information PAL-ACL Plan Modification, August 29, 2022

Attachment 13 – Groundwater Monitoring and Point Information (Form 4400-089)

Attachment 14 – PW-10 and PW-11 Abandonment Logs

cc:

David Buser, Wisconsin Department of Natural Resources (electronic copy)

Joseph Lourigan, Wisconsin Department of Natural Resources (electronic copy)

Timothy Curry, GFL Environmental (electronic copy)

Daniel Otzelberger, GFL Environmental (hard copy and electronic copy)

Chad Siegle, GFL Environmental (electronic copy)

Joe Spear, JSA Environmental Inc. (electronic copy)

Timm Speerschneider, DeWitt (electronic copy)

Wes Webendorfer, DeWitt (electronic copy)

John Oswald, Tetra Tech (electronic copy)

Nick Dykstra, Tetra Tech (electronic copy)

REPORT CERTIFICATION

Feasibility Report – Addendum No. 1
Emerald Park Landfill – Western Expansion
City of Muskego, Waukesha County, Wisconsin

I, Mark Torresani, 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 chess. NR 500 to 538, Wis. Adm. Code.

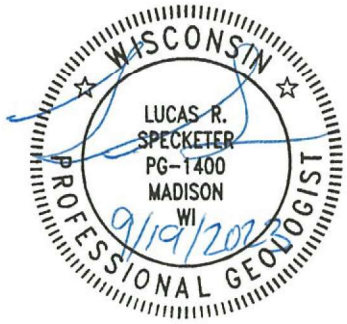
Mark Torresani, P.E.

Signature

Vice President / Engineer

Title

I, Lucas R. 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.



Lucas R. Specketer, P.G.

Signature

Project Manager / Geologist

Title