



Chemical Waste
17629 Cedar Springs Lane
Arlington, OR 97812

April 29, 2024

VIA U.S. MAIL & E-MAIL

Ron Doughten
Eastern Region Manager
Hazardous Waste Program
Oregon Department of Environmental Quality
400 E Scenic Dr., Suite 2-307
The Dalles, OR 97058

**RE: Chemical Waste Management of the Northwest Inc. (CWMNW)
Permit ORD 089 452 353
Class 3 Landfill L-14 Expansion Modification**

Dear Mr. Doughten:

CWMNW is submitting this Class 3 Permit Modification for the expansion of Landfill L-14 by the addition of Cells 5, 6, 7, and 8 with temporary authorization to construct and operate Cell 5. Please refer to the Temporary Authorization request detail at this end of this letter for justification. These modifications include revisions to the language in the following Standalone Documents:

Standalone Document #7 – Groundwater monitoring Plan
Standalone Document #14 - Landfill Design, and Operations Plan
Standalone Document #15 - Response Action Plan for Landfill L-14
Standalone Document #18 - Landfill Design Drawings

In 2010 CWMNW completed a new estimate of needed disposal capacity, which resulted in the decision to expand the disposal capacity of Landfill L-14 by adding Cell 5 which increased the capacity to approximately 6.2×10^6 cubic yards. In 2024 CWMNW is submitting the Landfill L-14 design contained in the renewal permit reorientating Cell 5 and adding Cells 6 through 8 which increases the capacity to a total of approximately 10.1×10^6 cubic yards. Refer to L-14 design drawings and Engineering Design Report contained in the Class III modification.

Currently active landfill cells were constructed in accordance with approved construction drawings and technical specifications prepared specifically for that phase of construction and include Cells 1, 2, 3 and 4 (modules A, B and C) of landfill L14. Construction for Landfill L14 (Cells 5 through 8) will be in accordance with the approved construction drawings and technical specifications, and construction quality assurance guided by Attachment #16 - Construction Quality Assurance Plans, prepared prior to initiating construction.

The documents that incorporate changes to Standalone documents are enclosed with this letter. The documents consist of the following:

- DEQ Permit Language (Including Fig 1-1) – Redline
- DEQ Permit Language (Including Fig 1-1) – Clean
- Standalone Document #7 – *Groundwater monitoring Plan*, Redline
- Standalone Document #7 – *Groundwater monitoring Plan*, Clean
- Standalone Document #14 *Landfill Design and Operations Plan*, Redline,
- Standalone Document #14 *Landfill Design and Operations Plan*, Clean
- Landfill L-14 Design Drawings
- Civil & Environmental Consultants’ Engineering Design Report
- Standalone Document #15 *Response Action Plan*, Part C, L-14, Redline
- Standalone Document #15 *Response Action Plan*, Part C, L-14, Clean
- Appendix A RAP Calculation Package
- Standalone Document #18 *Landfill Design Drawings*, Redline, and
- Standalone Document #18 *Landfill Design Drawings*, Clean.

CWMNW in compliance with 40 CFR 270.42(e) also requests temporary authority to construct and operate Cell 5 of landfill L-14 covered by this Class 3 modification based on the avoidance of disrupting ongoing waste management and disposal activities at the facility and to allow CWM the ability to respond to changes in the waste quantities over the next several years.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Thank you again for your assistance with this important issue. Should you have any questions or concerns, please feel free to contact me by phone at (605) 757-3352 or by email at jdenson@wm.com.

Sincerely,



James L. Denson Jr.
PNW/BC Environmental Protection Manager

CC;

Electronic Submittal through DEQ YDO Web portal
Ryan Peterson, Oregon DEQ – Via E-mail
Spencer Bohaboy, Oregon DEQ – Via E-mail
Robert Mulholland, District Manager, CWMNW