

June 2023
0120-662-50-38-02

REVISION TO NOTICE OF CONSTRUCTION DE 90-C153

Regional Disposal Company

**ROOSEVELT REGIONAL LANDFILL
Klickitat County, Washington
AIR OPERATING PERMIT NO. 14AQ-C182**

PREPARED BY





June 28, 2023
Project #: 0120-662-50-38-02

Ms. Lynnette Haller
Ecology Central Regional Office – Air Quality Program
WA Department of Ecology
Cashiering Unit
P.O. Box 47611
Olympia, WA 98504-7611

Re: Revision to Notice of Construction Application
NOC DE90-C153, Fifth Revision
Roosevelt Regional Landfill
Klickitat County
Air Operating Permit No. 14AQ-C182

Dear Ms. Haller:

On behalf of Regional Disposal Company, please find enclosed the Notice of Construction (NOC) revision application for the Roosevelt Regional Landfill (Site) located in Klickitat County. The Regional Disposal Company is submitting a revision to NOC DE 90-C153 (Fifth Revision) for municipal solid waste (MSW) landfill and associated traffic, equipment movement, wind erosion, rock crushing, and fugitive landfill gas. This NOC application is submitted pursuant to the Washington Administrative Code (WAC) 173-400-110 to revise the size and emissions from the MSW landfill.

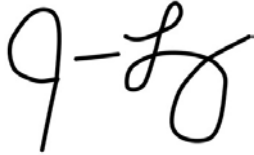
The submittal contains the Washington DOE NOC Application Form, process description and basis of emission estimates, regulatory applicability, State Environmental Policy Act (SEPA) Compliance Review, Best Available Control Technology (BACT) evaluation, Ambient Air Impacts Analysis, site map, process flow diagram, and emission calculations.

The Site is located in an attainment area and is a minor source under the Prevention of Significant Deterioration (PSD) Program. This proposed project is a minor modification and as such will not trigger PSD review.

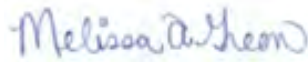
If you have any questions or comments regarding this submittal, please do not hesitate to contact us.

Ms. Lynnette Haller
June 28, 2023
Page 2

Sincerely,
Weaver Consultants Group



Jonathan Lumang
Project Manager



Melissa Green
Project Director

Attachment: Notice of Construction Revision Application

cc: Art Mains, Regional Disposal Company
James Rivard, Washington State Department of Ecology, Central Regional Office



Hi. Your package was delivered Fri,
07/14/2023 at 10:30am.

Delivered to 1250 W ALDER ST, UNION GAP, WA 98903

Received by M.MARISALA

TRACKING NUMBER [772737480930](#)

FROM WEAVER CONSULTANTS GROUP
7340 E CALEY AVE, STE 110
CENTENNIAL, CO, US, 80111

TO Washington Dept of Ecology
Lynnette Haller
1250 West Alder Street
Central Regional Air Qual Program
UNION GAP, WA, US, 98903

DEPARTMENT NUMBER 82244

INVOICE NUMBER 82244

PURCHASE ORDER NUMBER 82244

REFERENCE 0120-662-50-38-02

SHIPPER REFERENCE 0120-662-50-38-02

SHIP DATE Thu 7/13/2023 05:50 PM

DELIVERED TO Receptionist/Front Desk

PACKAGING TYPE FedEx Pak

ORIGIN CENTENNIAL, CO, US, 80111

DESTINATION UNION GAP, WA, US, 98903

NUMBER OF PIECES 1

TOTAL SHIPMENT WEIGHT 3.00 LB

SERVICE TYPE FedEx Standard Overnight



Hi. Your package was delivered Fri,
07/14/2023 at 10:30am.

Delivered to 1250 W ALDER ST, UNION GAP, WA 98903

Received by M.MARISALA

TRACKING NUMBER	772737506073
FROM	WEAVER CONSULTANTS GROUP 7340 E CALEY AVE, STE 110 CENTENNIAL, CO, US, 80111
TO	Washington Dept of Ecology James Rivard 1250 West Alder Street Central Regional Air Qual Section UNION GAP, WA, US, 98903
DEPARTMENT NUMBER	82244
INVOICE NUMBER	82244
PURCHASE ORDER NUMBER	82244
REFERENCE	0120-662-50-38-02
SHIPPER REFERENCE	0120-662-50-38-02
SHIP DATE	Thu 7/13/2023 05:50 PM
DELIVERED TO	Receptionist/Front Desk
PACKAGING TYPE	FedEx Pak
ORIGIN	CENTENNIAL, CO, US, 80111
DESTINATION	UNION GAP, WA, US, 98903
NUMBER OF PIECES	1
TOTAL SHIPMENT WEIGHT	3.00 LB
SERVICE TYPE	FedEx Standard Overnight

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1 INTRODUCTION

1.1 Purpose

The purpose of this Notice of Construction (NOC) Application is to authorize fugitive emissions from the proposed expansion of the Municipal Solid Waste (MSW) Landfill at the Roosevelt Regional Landfill (Site) in Klickitat County, Washington. The site is currently authorized under Air Operating Permit No. 14AQ-C182, which was most recently issued on June 16, 2014. With this revision, the site is proposing to increase its total capacity to 360,000,000 cubic yards (cy) or an equivalent design capacity of 324,000,000 tons.

The site is currently authorized under the following NOCs for different emission units at the site:

1. MSW Landfill – NOC DE90-C153, Fifth Revision
2. Ash Monofill – NOC 93AQ-C163, Fourth Revision
3. LFG Flare – NOC DE98AQ-C131, First Revision (under review)
4. Second LFG Flare – NOC 08AQ-C087, Second Revision (under review)
5. Leachate Pond – No NOC assigned yet (under review)

A completed NOC Application form for the landfill is included in Appendix A.

1.2 Facility Description

The site is a MSW landfill owned and operated by Regional Disposal Company and is located in Klickitat County. The Site has an existing active landfill gas collection and control system (GCCS). The GCCS is used to extract landfill gas (LFG) from within the landfill. The extracted LFG is then conveyed to two (2) enclosed flares and/or a third-party energy developer. A site map is provided in Appendix B.

The Site is located in an attainment area and is an existing minor source under the Prevention of Significant Deterioration (PSD) regulations. The proposed project is a minor modification and therefore will not trigger PSD review. The MSW landfill emissions are outlined in Table 1.

Table 1
MSW Landfill Fugitive Emissions (tons/year)

	VOC	TSP ^a	PM ₁₀ ^a	PM _{2.5} ^a
Currently Authorized	93.6	513.3	113.2	20.7
Proposed Potential Emissions	130.42	513.3	113.2	20.7
Change in Emissions^b	+36.82	--	--	--

^a There are no proposed changes to the particulate matter emissions.

^b Emissions represent a change in fugitive emissions. Fugitive emissions were updated based on a 80% collection efficiency per current NOC. Fugitive emissions are estimates only and should not be considered as maximum allowable limits.

2 PROCESS DESCRIPTION AND BASIS OF EMISSION ESTIMATES

The anaerobic decomposition of organic material in the waste results in the generation of a biogas commonly referred to as landfill gas (LFG). Consisting of approximately 50 percent methane and 50 percent carbon dioxide, LFG also includes other trace compounds and water vapor.

The U.S. Environmental Protection Agency's (EPA's) Landfill Gas Emissions Model (LandGEM) was used to determine the LFG generation for the Site. The landfill's historical waste acceptance data, a methane generation rate of 0.02 yr⁻¹ and a methane generation capacity of 100 m³/Mg were used in the model to determine the potential LFG generation rate. With this revision, the site is proposing to increase its total capacity to 360,000,000 cubic yards (cy) or an equivalent design capacity of 324,000,000 tons.

With commencement of construction of the proposed expansion, the site will become subject to 40 Code of Federal Regulations (CFR) §60, Subpart XXX – Standards of Performance for Municipal Solid Waste Landfills (NSPS).

Based on the modeling results, the projected maximum LFG generation rate for the landfill gas is estimated to be 43,709 standard cubic feet per minute (scfm) at 50% methane in 2079. A copy of the LandGEM inputs and results for methane generation is presented in Appendix D.

The landfill is an existing source which is under a continuous program of construction. This NOC revision is intended to represent and authorize the emissions and sources at the completion of construction and all times during the construction of the landfill.

To estimate the fugitive landfill gas emissions, the site's GCCS is assumed to collect approximately 80% (with remaining 20% to be fugitive) of the LFG generated based on the currently authorized NOC. The landfill fugitive volatile organic compounds (VOC) and hazardous air pollutant (HAP) emissions were estimated using AP-42, Section 2.4 for MSW landfill emissions and are included in Appendix E.

3 REGULATORY APPLICABILITY

The applicable standards identified below are for the MSW landfill.

3.1 New Source Performance Standards

The New Source Performance Standards (NSPS) were developed by the U. S. Environmental Protection Agency (EPA) for specific source categories. The following section discusses applicable NSPS regulations for the entire site.

3.1.1 NSPS (40 CFR 60) Subpart XXX

The site has not commenced construction, reconstruction, or modification after July 17, 2014. Upon approval of the proposed expansion and beginning of construction the Site will be subject to the requirements of NSPS Subpart XXX.

3.2 Federal Plan (40 CFR 62) Subpart OOO

The site began construction, reconstruction, or modification on or Before July 17, 2014 and Have Not Been Modified or Reconstructed Since July 17, 2014 and has a design capacity greater than 2.5 million megagrams (Mg) and 2.5 million cubic meters (m³). As such, the site is currently subject to the requirements in Federal Plan Subpart OOO for MSW landfills.

3.3 National Emission Standards for Hazardous Air Pollutants

National Emission Standards for Hazardous Air Pollutants (NESHAP) found in 40 CFR Parts 61 and 63 are emission standards for hazardous air pollutants (HAPs) that apply to major sources (facilities that exceed the major source thresholds of 10 tons per year (tpy) of a single HAP and 25 tpy of any combination of HAPs) or specifically designated area sources under Part 63. The Part 63 NESHAPs apply to sources in specifically regulated industrial source classifications (Clean Air Act Section 112(d)) or on a case-by-case basis (Clean Air Act Sections 112(g) and 112(j)) where EPA has failed to promulgate a 112(d) standard. The following section discusses applicable NESHAP regulations for the entire site.

3.3.1 NESHAP (40 CFR 61) Subpart M

40 CFR Part 61 Subpart M, Section 61.154, Standards for Active Waste Disposal Sites, require each owner or operator of an active waste disposal site that receives asbestos

containing waste material to meet the requirements of the section. Roosevelt Regional Landfill receives asbestos containing materials and is therefore subject to this subpart.

3.3.2 NESHAP (40 CFR 63) Subpart AAAAA

The estimated NMOC emissions from the site are greater than 50 Mg/yr and is therefore subject to NESHAP Subpart AAAAA.

4 STATE ENVIRONMENTAL POLICY ACT COMPLIANCE REVIEW

The Washington DOE requires all NOC Applications to review State Environmental Policy Act (SEPA) Compliance.

A SEPA Environmental Impact Statement (EIS) was prepared for the landfill expansion in November 2022, which is attached in Appendix G.

5 BEST AVAILABLE CONTROL TECHNOLOGY EVALUATION

The Washington DOE requires all NOC Applications to address Best Available Control Technology (BACT) employed for each emission source to minimize emissions.

The site currently has two (2) enclosed flares which are considered a BACT for landfills to control and minimize emissions. Future flares in anticipation of the proposed expansion will be phased in based on estimated landfill gas generation at the site, and as such this modification to the NOC does not require further BACT analysis.

6 AMBIENT AIR IMPACTS ANALYSIS

The Washington DOE requires all NOC Applications to perform an ambient air impacts analysis for each emission source. As such, an ambient air impact analysis was performed for the pollutants released from the leachate ponds.

Given that this NOC addresses fugitive emissions, there are no criteria air pollutants in this project listed under the National Ambient Air Quality Standards (NAAQS) and Washington Ambient Air Quality Standards (WAAQS). The Washington DOE Guidance Document titled “Ambient Air Impacts Analyses” (ECY 070-410e) was used to perform the Ambient Air Impacts Analysis for the Toxic Air Pollutants (TAPs).

Potential emissions from the project were compared to the *de minimis* emission levels specified in WAC 173-460-150 as shown in Table 1. TAPs that exceed their respective *de minimis* emission levels require further analysis as discussed below. No further analysis is required for the TAPs that are below their respective *de minimis* emission levels.

TAPs that exceed their *de minimis* emission levels were also compared to the Small Quantity Emission Rate (SQERs) specified in WAC 173-460-150 also shown in Table 1. TAPs that exceed their respective SQER require further analysis as discussed below. No further analysis is required for the TAPs that are below their respective SQER.

Table 1. *de minimis* Emission Level and Small Quantity Emission Rate (SQER) Comparison Demonstration

Pollutant	Emissions	<i>de minimis</i> Emission Levels	Below <i>de minimis</i> ?	SQER	Below SQER?
1,2,3-Trimethylbenzene	0.53 lb/day	0.22 lb/day	NO	4.40 lb/day	YES
1,2,4-Trimethylbenzene	3.35 lb/day	0.22 lb/day	NO	4.40 lb/day	YES
1,2-Dichloroethane	151.85 lb/yr	0.31 lb/yr	NO	6.20 lb/yr	NO
1,3,5-Trimethylbenzene	1.40 lb/day	0.22 lb/day	NO	4.40 lb/day	YES
1,4-Dichlorobenzene	261.44 lb/yr	0.74 lb/yr	NO	15.00 lb/yr	NO
1,4-Dioxane	31.64 lb/yr	1.60 lb/yr	NO	32.00 lb/yr	YES
2-Propanol (Isopropyl alcohol)	0.61 lb/hr	0.30 lb/hr	NO	5.90 lb/hr	YES
Benzene	587.22 lb/yr	1.00 lb/yr	NO	21.00 lb/yr	NO
Carbon Disulfide	0.23 lb/day	3.00 lb/day	YES	--	--
Carbonyl Sulfide	0.86 lb/day	0.04 lb/day	NO	0.74 lb/day	NO
Chlorobenzene	0.14 lb/day	3.70 lb/day	YES	--	--

Pollutant	Emissions	<i>de minimis</i> Emission Levels	Below <i>de</i> <i>minimis</i> ?	SQER	Below SQER?
Chlorodifluoromethane	0.26 lb/day	190.00 lb/day	YES	--	--
Chloroethane (ethyl chloride)	0.07 lb/day	110.00 lb/day	YES	--	--
Cumene (Isopropylbenzene)	0.66 lb/day	1.50 lb/day	YES	--	--
Cyclohexane	1.14 lb/day	22.00 lb/day	YES	--	--
Ethylbenzene	3335.35 lb/yr	3.20 lb/yr	NO	65.00 lb/yr	NO
Hexane	1.20 lb/day	2.60 lb/day	YES	--	--
Hydrogen Sulfide	63.65 lb/day	0.0074 lb/day	NO	0.15 lb/day	NO
m & p Xylenes	19.66 lb/day	0.82 lb/day	NO	16.00 lb/day	NO
Methanol	10.61 lb/day	74.00 lb/day	YES	--	--
Methyl butyl ketone	0.19 lb/day	0.11 lb/day	NO	2.20 lb/day	YES
Methyl Ethyl Ketone	19.67 lb/day	19.00 lb/day	NO	370.00 lb/day	YES
Methyl Isobutyl Ketone	2.46 lb/day	11.00 lb/day	YES	--	--
Methylene Dichloride	85.77 lb/yr	490.00 lb/yr	YES	--	--
Naphthalene	1991.87 lb/yr	0.24 lb/yr	NO	4.80 lb/yr	NO
n-Hexane	0.97 lb/day	2.60 lb/day	YES	--	--
o-Xylene	6.15 lb/day	0.82 lb/day	NO	16.00 lb/day	YES
Perchloroethylene (tetrachloroethylene)	420.53 lb/yr	1.30 lb/yr	NO	27.00 lb/yr	NO
Styrene	0.85 lb/day	3.20 lb/day	YES	--	--
Tetrahydrofuran	5.15 lb/day	7.40 lb/day	YES	--	--
Toluene	22.87 lb/day	19.00 lb/day	NO	370.00 lb/day	YES
Trichloroethylene (trichloroethene)	112.79 lb/yr	1.70 lb/yr	NO	34.00 lb/yr	NO
Vinyl Chloride	38.40 lb/yr	0.92 lb/yr	NO	18.00 lb/yr	NO

Table 2 below shows TAPs that exceed their SQER, and as such, AERSCREEN was used to determine if the maximum ground level concentrations (GLC_{max}) are below their respective acceptable source impact level (ASIL) specified in WAC 173-460-150. A unitary model (1 lb/hr) was used to run AERSCREEN. Inputs used are all default or conservative estimates as shown in Appendix F. TAPs that exceed their respective ASIL after AERSCREEN require further analysis as discussed below. No further analysis is required for the TAPs that are below their respective ASIL using AERSCREEN. AERSCREEN results can be found in Appendix F.

Table 2. Acceptable Source Impact Level (ASIL) Comparison Demonstration using AERSCREEN

Pollutant	GLC_{max} ($\mu\text{g}/\text{m}^3$)	ASIL ($\mu\text{g}/\text{m}^3$)	Averaging Period	Below ASIL?
1,2-Dichloroethane (ethylene dichloride)	0.10	0.04	Year	NO
1,4-Dichlorobenzene	0.17	0.09	Year	NO
Benzene	0.39	0.13	Year	NO

Pollutant	GLC _{max} (µg/m ³)	ASIL (µg/m ³)	Averaging Period	Below ASIL?
Carbonyl Sulfide	0.21	10.00	24-hr	YES
Ethylbenzene	2.20	0.40	Year	NO
Hydrogen Sulfide	15.30	2.00	24-hr	NO
m & p Xylenes	4.73	220.00	24-hr	YES
Naphthalene	1.31	0.03	Year	NO
Perchloroethylene (tetrachloroethylene)	0.28	0.16	Year	NO
Trichloroethylene (trichloroethene)	0.07	0.21	Year	YES
Vinyl Chloride	0.03	11.00	Year	YES

Given that the following TAPs exceed their ASIL using AERSCREEN, the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) was further used to determine if the GLC_{max} are below their respective ASIL. As shown in Table 3 below, ammonia and naphthalene are below their ASIL, and no further analysis is required. Full AERMOD results and a report can be found in Appendix F.

Table 3. Acceptable Source Impact Level (ASIL) Comparison Demonstration using AERMOD

Pollutant	GLC _{max} (µg/m ³)	ASIL (µg/m ³)	Averaging Period	Below ASIL?
1,2-Dichloroethane (ethylene dichloride)	0.00354	0.038	Year	YES
1,4-Dichlorobenzene	0.00530	0.091	Year	YES
Benzene	0.01238	0.13	Year	YES
Ethylbenzene	0.06718	0.40	Year	YES
Hydrogen Sulfide (H ₂ S)*	1.97540	2.00	24-hr	YES
Naphthalene*	0.02829	0.029	Year	YES
Perchloroethylene (tetrachloroethylene)	0.00884	0.16	Year	YES

**The ability of landfill cover soils to reduce levels of H₂S and methane in landfill gas is widely-accepted and has been tested in the laboratory and in the field in many studies. Specifically, landfill cover soils reduce H₂S and methane levels in landfill gas through a process of sorption and conversion, whereby gas molecules adsorb to the surfaces of landfill cover soils and convert to minerals through reactions with alkaline materials in the soil. As such, fugitive emissions for H₂S and naphthalene for the proposed expansion have been reduced by 60% and 30%, respectively.*

APPENDIX A
NOTICE OF CONSTRUCTION APPLICATION FORM



Notice of Construction Application

A notice of construction permit is required before installing a new source of air pollution or modifying an existing source of air pollution. This application applies to facilities in Ecology’s jurisdiction. Submit this application for review of your project. For general information about completing the application, refer to Ecology Forms ECY 070-410a-g, “Instructions for Ecology’s Notice of Construction Application.”

Ecology offers up to two hours of free pre-application assistance. We encourage you to schedule a pre-application meeting with the contact person specified for the location of your proposal, below. If you use up your two hours of free pre-application assistance, we will continue to assist you after you submit Part 1 of the application and the application fee. You may schedule a meeting with us at any point in the process.

Upon completion of the application, please enclose a check for the initial fee and mail to:

**Department of Ecology
Cashiering Unit
P.O. Box 47611
Olympia, WA 98504-7611**

For Fiscal Office Use Only:
001-NSR-216-0299-000404

Check the box for the location of your proposal. For assistance, call the contact listed below:	
Ecology Permitting Office	Contact
<input checked="" type="checkbox"/> CRO	Chelan, Douglas, Kittitas, Klickitat, or Okanogan County Ecology Central Regional Office – Air Quality Program Lynnette Haller (509) 457-7126 lynnette.haller@ecy.wa.gov
<input type="checkbox"/> ERO	Adams, Asotin, Columbia, Ferry, Franklin, Garfield, Grant, Lincoln, Pend Oreille, Stevens, Walla Walla or Whitman County Ecology Eastern Regional Office – Air Quality Program Karin Baldwin (509) 329-3452 karin.baldwin@ecy.wa.gov
<input type="checkbox"/> NWRO	San Juan County Ecology Northwest Regional Office – Air Quality Program David Adler (425) 649-7267 david.adler@ecy.wa.gov
<input type="checkbox"/> IND	For actions taken at Kraft and Sulfite Paper Mills and Aluminum Smelters Ecology Industrial Section – Waste 2 Resources Program James DeMay (360) 407-6868 james.demay@ecy.wa.gov Permit manager: _____
<input type="checkbox"/> NWP	For actions taken on the US Department of Energy Hanford Reservation Ecology Nuclear Waste Program Lilyann Murphy (509) 372-7951 lilyann.murphy@ecy.wa.gov

Check the box below for the fee that applies to your application.



Notice of Construction Application

New project or equipment:

- | | |
|--------------------------|--|
| <input type="checkbox"/> | \$1,500: Basic project initial fee covers up to 16 hours of review. |
| <input type="checkbox"/> | \$10,000: Complex project initial fee covers up to 106 hours of review. |

Change to an existing permit or equipment:

- | | |
|-------------------------------------|---|
| <input type="checkbox"/> | \$200: Administrative or simple change initial fee covers up to 3 hours of review
Ecology may determine your change is complex during completeness review of your application. If your project is complex, you must pay the additional \$675 before we will continue working on your application. |
| <input checked="" type="checkbox"/> | \$875: Complex change initial fee covers up to 10 hours of review |
| <input type="checkbox"/> | \$350 flat fee: Replace or alter control technology equipment under WAC 173-400-114
Ecology will contact you if we determine your change belongs in another fee category. You must pay the fee associated with that category before we will continue working on your application. |

- | | |
|---|--|
| Read each statement, then check the box next to it to acknowledge that you agree. | |
| <input checked="" type="checkbox"/> | The initial fee you submitted may not cover the cost of processing your application. Ecology will track the number of hours spent on your project. If the number of hours Ecology spends exceeds the hours included in your initial fee, Ecology will bill you \$95 per hour for the extra time. |
| <input checked="" type="checkbox"/> | You must include all information requested by this application. Ecology may not process your application if it does not include all the information requested. |
| <input checked="" type="checkbox"/> | Submittal of this application allows Ecology staff to visit and inspect your facility. |



Notice of Construction Application Part 1: General Information

I. Project, Facility, and Company Information

1. Project Name Roosevelt Regional Landfill
2. Facility Name Roosevelt Regional Landfill
3. Facility Street Address 500 Roosevelt Grade Rd, Roosevelt, WA 99356
4. Facility Legal Description The source is located at 500 Roosevelt Grade Road, in Roosevelt Washington within Sections 22, 23, 26, 27, 28, 33, and 34, Township 4 North, Range 21 East, W.M., Klickitat County.
5. Company Legal Name (if different from Facility Name) Regional Disposal Company
6. Company Mailing Address (street, city, state, zip) P.O. Box 338, Roosevelt, WA 99356

II. Contact Information and Certification

1. Facility Contact Name (who will be onsite) Art Mains	
2. Facility Contact Mailing Address (if different than Company Mailing Address)	
3. Facility Contact Phone Number 509-581-0466	4. Facility Contact E-mail amains@republicservices.com
5. Billing Contact Name (who should receive billing information) Art Mains	
6. Billing Contact Mailing Address (if different than Company Mailing Address)	
7. Billing Contact Phone Number 509-581-0466	8. Billing Contact E-mail amains@republicservices.com
9. Consultant Name (optional – if 3 rd party hired to complete application elements) Melissa Green	
10. Consultant Organization/Company Weaver Consultants Group	
11. Consultant Mailing Address (street, city, state, zip) 7430 E Caley Ave, Suite 110, Centennial, CO 80111	
12. Consultant Phone Number 720-529-0132	13. Consultant E-mail mgreen@wcgrp.com
14. Responsible Official Name and Title (who is responsible for project policy or decision-making) Jeff Barcnas, General Manager	
16. Responsible Official Phone 509-203-2061	17. Responsible Official E-mail jbarcnas@republicservices.com
18. Responsible Official Certification and Signature I certify that the information on this application is accurate and complete.	
Signature	Date <u>6/28/23</u>



Notice of Construction Application

Part 2: Technical Information

The Technical Information may be sent with this application form to the Cashiering Unit, or may be sent directly to the Ecology regional office with jurisdiction along with a copy of this application form.

For all sections, check the box next to each item as you complete it.

III. Project Description

Please attach the following to your application.

- Written narrative describing your proposed project.
- Projected construction start and completion dates.
- Operating schedule and production rates.
- List of all major process equipment with manufacturer and maximum rated capacity.
- Process flow diagram with all emission points identified.
- Plan view site map.

- Manufacturer specification sheets for major process equipment components.
- Manufacturer specification sheets for pollution control equipment.
- Fuel specifications, including type, consumption (per hour & per year) and percent sulfur.

IV. State Environmental Policy Act (SEPA) Compliance

Check the appropriate box below.

SEPA review is complete:
Include a copy of the final SEPA checklist and SEPA determination (e.g., DNS, MDNS, EIS) with your application.

SEPA review has not been conducted:

If review will be conducted by another agency, list the agency. You must provide a copy of the final SEPA checklist and SEPA determination before Ecology will issue your permit.

Agency Reviewing SEPA:

If the review will be conducted by Ecology, fill out a SEPA checklist and submit it with your application. You can find a SEPA checklist online at <https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-document-templates>



Notice of Construction Application

V. Emissions Estimations of Criteria Pollutants

Does your project generate criteria air pollutant emissions? Yes No

If yes, please provide the following information regarding your criteria emissions in your application.

- The names of the criteria air pollutants emitted (i.e., NO_x, SO₂, CO, PM_{2.5}, PM₁₀, TSP, VOC, and Pb)
- Potential emissions of criteria air pollutants in tons per hour, tons per day, and tons per year (include calculations)
- If there will be any fugitive criteria pollutant emissions, clearly identify the pollutant and quantity

VI. Emissions Estimations of Toxic Air Pollutants

Does your project generate toxic air pollutant emissions? Yes No

If yes, please provide the following information regarding your toxic air pollutant emissions in your application.

- The names of the toxic air pollutants emitted (specified in [WAC 173-460-150¹](#))
- Potential emissions of toxic air pollutants in pounds per hour, pounds per day, and pounds per year (include calculations)
- If there will be any fugitive toxic air pollutant emissions, clearly identify the pollutant and quantity

VII. Emission Standard Compliance

Provide a list of all applicable new source performance standards, national emission standards for hazardous air pollutants, national emission standards for hazardous air pollutants for source categories, and emission standards adopted under Chapter 70.94 RCW.

Does your project comply with all applicable standards identified? Yes No

VIII. Best Available Control Technology

Provide a complete evaluation of Best Available Control Technology (BACT) for your proposal.

¹ <http://apps.leg.wa.gov/WAC/default.aspx?cite=173-460-150>



Notice of Construction Application

IX. Ambient Air Impacts Analyses

Please provide the following:

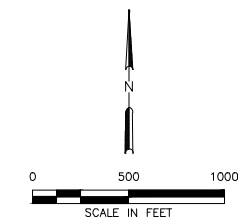
- Ambient air impacts analyses for Criteria Air Pollutants (including fugitive emissions)
- Ambient air impacts analyses for Toxic Air Pollutants (including fugitive emissions)

- Discharge point data for each point included in air impacts analyses (include only if modeling is required)
 - Exhaust height
 - Exhaust inside dimensions (ex. diameter or length and width)
 - Exhaust gas velocity or volumetric flow rate
 - Exhaust gas exit temperature
 - The volumetric flow rate
 - Description of the discharges (i.e., vertically or horizontally) and whether there are any obstructions (ex., raincap)
 - Identification of the emission unit(s) discharging from the point
 - The distance from the stack to the nearest property line
 - Emission unit building height, width, and length
 - Height of tallest building on-site or in the vicinity and the nearest distance of that building to the exhaust
 - Whether the facility is in an urban or rural location

Does your project cause or contribute to a violation of any ambient air quality standard or acceptable source impact level? Yes No

APPENDIX B

SITE MAP



LEGEND

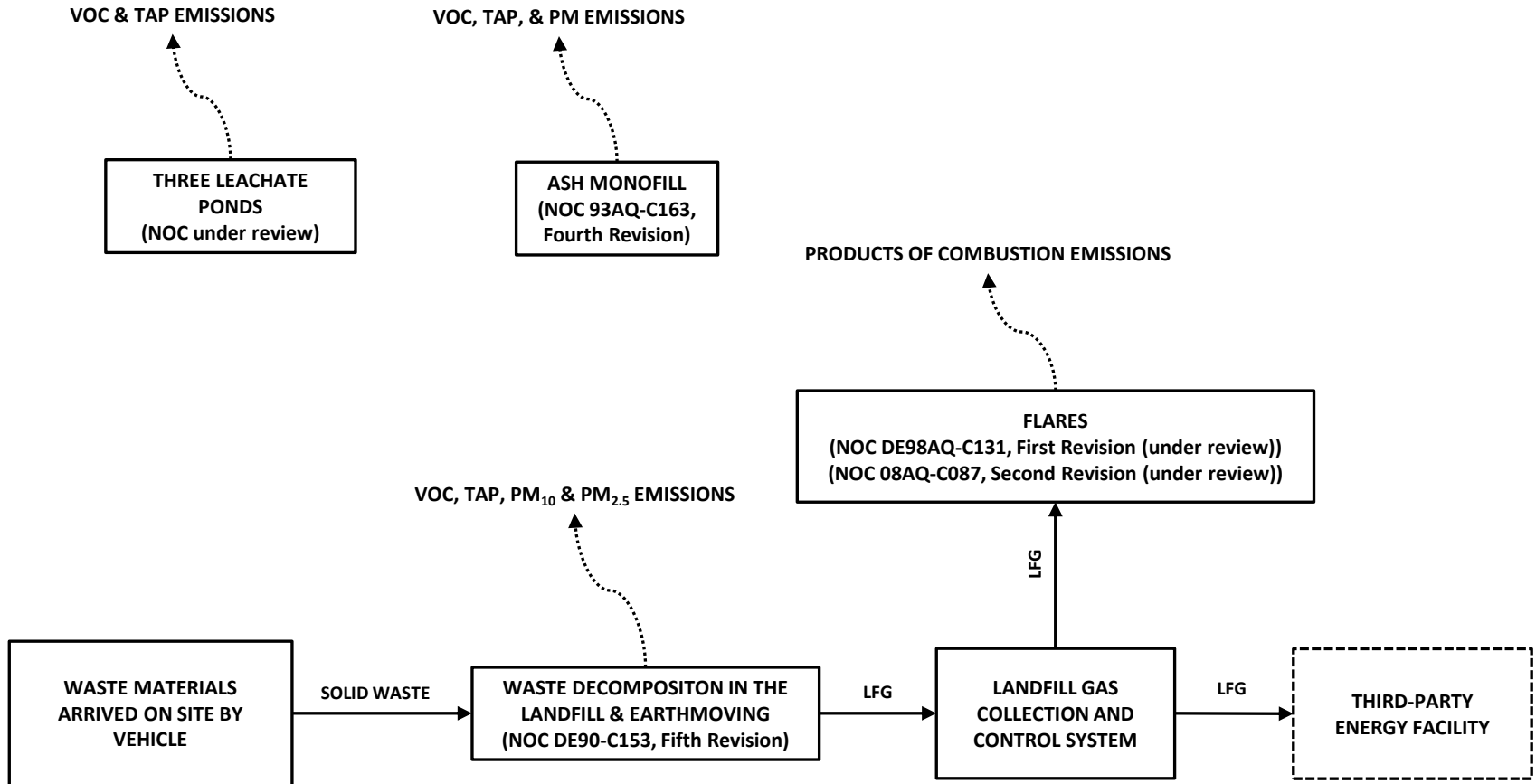
- PROPERTY BOUNDARY
LINE ITEM 3(a): 1890
- PERMITTED LIMITS OF WASTE
LINE ITEM 5(a) 915
- LIMITS OF EXISTING WASTE
LINE ITEM 8(a): 404.8

NOTES:

1. AERIAL PHOTOGRAPH PREPARED BY FIRMATEK, LLC. FROM AERIAL PHOTOGRAPHY FLOWN OCTOBER 17, 2022.

<input type="checkbox"/> DRAFT <input checked="" type="checkbox"/> FOR PERMITTING PURPOSES ONLY <input type="checkbox"/> ISSUED FOR REVIEW	PREPARED FOR REGIONAL DISPOSAL COMPANY	SITE MAP		
DATE: 06/2023 FILE: 0120-662-50-37-00 CAD: 01-2022 AERIAL PHOTO.DWG	DRAWN BY: RSB DESIGN BY: JSE REVIEWED BY: WCH	REVISIONS		
		NO.	DATE	DESCRIPTION
		ROOSEVELT REGIONAL LANDFILL KLICKITAT COUNTY, WASHINGTON		
		WWW.WCGRP.COM DRAWING 01		

APPENDIX C
PROCESS FLOW DIAGRAM



**NOTICE OF CONSTRUCTION APPLICATION
PROCESS FLOW DIAGRAM
MUNICIPAL SOLID WASTE LANDFILL**

ROOSEVELT REGIONAL LANDFILL
KLICKITAT COUNTY, WASHINGTON
JUNE 2023



Weaver Consultants Group

6420 Southwest Blvd. Suite 206
Fort Worth, TX 76109
(817) 735-9770

FIGURE 1

APPENDIX D

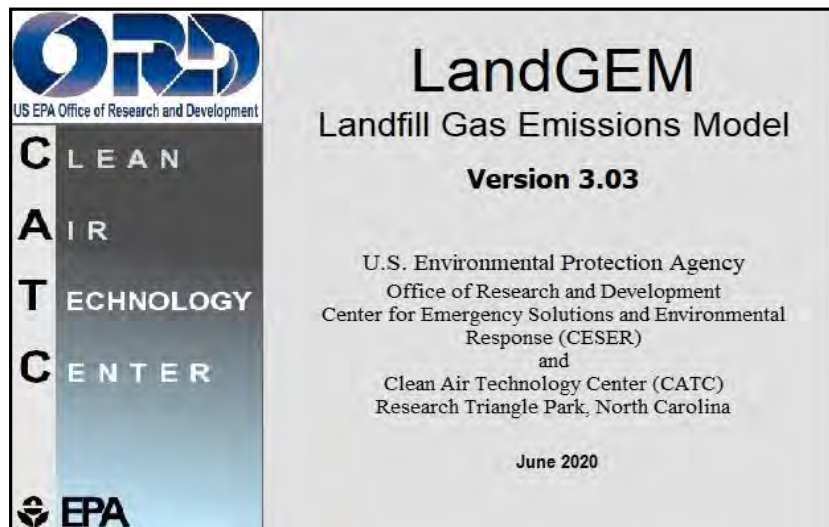
EPA LANDFILL GAS EMISSIONS MODEL INPUTS AND RESULTS

ESTIMATED METHANE GENERATION RATE
ROOSEVELT REGIONAL LANDFILL - KLICKITAT COUNTY, WASHINGTON

Year	Waste Accepted (Mg/yr)	Waste In-Place (Mg)	Methane Generation		
			Run 1 (m ³ /yr)	Run 2 (m ³ /yr)	Combined (m ³ /yr)
1990	951	0	0		0
1991	12,317	951	1,885		1,885
1992	232,457	13,268	26,261		26,261
1993	422,881	245,725	486,497		486,497
1994	701,862	668,606	1,315,062		1,315,062
1995	872,433	1,370,468	2,680,192		2,680,192
1996	978,088	2,242,901	4,356,382		4,356,382
1997	1,072,472	3,220,989	6,208,802		6,208,802
1998	1,075,774	4,293,461	8,211,620		8,211,620
1999	1,357,672	5,369,235	10,181,325		10,181,325
2000	990,994	6,726,907	12,670,782		12,670,782
2001	1,115,501	7,717,901	14,384,146		14,384,146
2002	1,211,313	8,833,402	16,310,370		16,310,370
2003	1,130,491	10,044,715	18,388,363		18,388,363
2004	1,158,394	11,175,206	20,265,010		20,265,010
2005	1,073,269	12,333,600	22,159,805		22,159,805
2006	1,213,359	13,406,869	23,848,352		23,848,352
2007	1,344,293	14,620,228	25,781,138		25,781,138
2008	1,242,073	15,964,521	27,935,179		27,935,179
2009	1,170,570	17,206,594	29,843,955		29,843,955
2010	1,135,604	18,377,164	31,573,208		31,573,208
2011	1,114,064	19,512,768	33,198,912		33,198,912
2012	1,120,974	20,626,832	34,749,731		34,749,731
2013	1,171,632	21,747,806	36,283,538		36,283,538
2014	1,203,602	22,919,438	37,887,383		37,887,383
2015	1,096,499	24,123,040	39,522,838		39,522,838
2016	1,153,560	25,219,539	40,913,619		40,913,619
2017	1,246,732	26,373,099	42,389,962		42,389,962
2018	1,412,654	27,619,831	44,021,749		44,021,749
2019	1,426,781	29,032,485	45,950,100		45,950,100
2020	1,442,995	30,459,266	47,868,268		47,868,268
2021	1,407,043	31,902,261	49,780,593		49,780,593
2022	4,535,000	33,309,304	51,583,791		51,583,791
2023	4,535,000	37,844,304	59,551,248		59,551,248
2024	4,535,000	42,379,304	67,360,939		67,360,939
2025	4,535,000	46,914,304	75,015,987		75,015,987
2026	4,535,000	51,449,304	82,519,456		82,519,456
2027	4,535,000	55,984,304	89,874,346		89,874,346
2028	4,535,000	60,519,304	97,083,599		97,083,599
2029	4,535,000	65,054,304	104,150,099		104,150,099
2030	4,535,000	69,589,304	111,076,674		111,076,674
2031	4,535,000	74,124,304	117,866,093		117,866,093
2032	4,535,000	78,659,304	124,521,072		124,521,072
2033	4,535,000	83,194,304	131,044,274		131,044,274
2034	4,535,000	87,729,304	137,438,308		137,438,308
2035	4,535,000	92,264,304	143,705,732		143,705,732
2036	4,535,000	96,799,304	149,849,053		149,849,053

ESTIMATED METHANE GENERATION RATE
ROOSEVELT REGIONAL LANDFILL - KLUCKITAT COUNTY, WASHINGTON

Year	Waste Accepted (Mg/yr)	Waste In-Place (Mg)	Methane Generation		
			Run 1 (m ³ /yr)	Run 2 (m ³ /yr)	Combined (m ³ /yr)
2037	4,535,000	101,334,304	155,870,727		155,870,727
2038	4,535,000	105,869,304	161,773,164		161,773,164
2039	4,535,000	110,404,304	167,558,726		167,558,726
2040	4,535,000	114,939,304	173,229,725		173,229,725
2041	4,535,000	119,474,304	178,788,431		178,788,431
2042	4,535,000	124,009,304	184,237,068		184,237,068
2043	4,535,000	128,544,304	189,577,814		189,577,814
2044	4,535,000	133,079,304	194,812,806		194,812,806
2045	4,535,000	137,614,304	199,944,139		199,944,139
2046	4,535,000	142,149,304	204,973,864		204,973,864
2047	4,535,000	146,684,304	209,903,994		209,903,994
2048	4,535,000	151,219,304	214,736,501		214,736,501
2049	4,535,000	155,754,304	219,473,318		219,473,318
2050	4,535,000	160,289,304	224,116,340		224,116,340
2051	4,535,000	164,824,304	228,667,424		228,667,424
2052	4,535,000	169,359,304	233,128,390		233,128,390
2053	4,535,000	173,894,304	237,501,023		237,501,023
2054	4,535,000	178,429,304	241,787,072		241,787,072
2055	4,535,000	182,964,304	245,988,252		245,988,252
2056	4,535,000	187,499,304	250,106,243		250,106,243
2057	4,535,000	192,034,304	254,142,692		254,142,692
2058	4,535,000	196,569,304	258,099,214		258,099,214
2059	4,535,000	201,104,304	261,977,392		261,977,392
2060	4,535,000	205,639,304	265,778,776		265,778,776
2061	4,535,000	210,174,304	269,504,888		269,504,888
2062	4,535,000	214,709,304	273,157,219		273,157,219
2063	4,535,000	219,244,304	276,737,228		276,737,228
2064	4,535,000	223,779,304	280,246,348		280,246,348
2065	4,535,000	228,314,304	283,685,983		283,685,983
2066	4,535,000	232,849,304	287,057,509		287,057,509
2067	4,535,000	237,384,304	290,362,274		290,362,274
2068	4,535,000	241,919,304	293,601,600		293,601,600
2069	4,535,000	246,454,304	296,776,784		296,776,784
2070	4,535,000	250,989,304	299,889,094	0	299,889,094
2071	4,535,000	255,524,304	293,950,892	8,988,885	302,939,777
2072	4,535,000	260,059,304	288,130,275	17,799,777	305,930,052
2073	4,535,000	264,594,304	282,424,913	26,436,203	308,861,115
2074	4,535,000	269,129,304	276,832,525	34,901,615	311,734,140
2075	4,535,000	273,664,304	271,350,874	43,199,402	314,550,275
2076	4,535,000	278,199,304	265,977,766	51,332,881	317,310,647
2077	4,535,000	282,734,304	260,711,054	59,305,306	320,016,360
2078	4,535,000	287,269,304	255,548,629	67,119,867	322,668,496
2079	2,063,696	291,804,304	250,488,427	74,779,689	325,268,116
2080		293,868,000	245,528,424	77,389,432	322,917,856
2081		293,868,000	240,666,635	75,857,018	316,523,654
2082		293,868,000	235,901,117	74,354,949	310,256,065
2083		293,868,000	231,229,962	72,882,622	304,112,584



Summary Report

Landfill Name or Identifier: Roosevelt Regional Landfill - 1 of 2

Date: Wednesday, June 28, 2023

Description/Comments:

Waste intake rates for years 1990 through 2002 provided by Republic Services. Waste intake for 2003 through 2019 from the 2019 Emission Calcs for WEIRS spreadsheet prepared by WCG. Parameters : User defined $k = 0.02$ year-1 and inventory arid area $L_0 = 100$ m³/Mg

About LandGEM:

First-Order Decomposition Rate Equation:

$$Q_{CH_4} = \sum_{i=1}^n \sum_{j=0.1}^1 kL_0 \left(\frac{M_i}{10} \right) e^{-kt_{ij}}$$

Where,

Q_{CH_4} = annual methane generation in the year of the calculation ($m^3/year$)

i = 1-year time increment

n = (year of the calculation) - (initial year of waste acceptance)

j = 0.1-year time increment

k = methane generation rate ($year^{-1}$)

L_0 = potential methane generation capacity (m^3/Mg)

M_i = mass of waste accepted in the i^{th} year (Mg)

t_{ij} = age of the j^{th} section of waste mass M_i accepted in the i^{th} year ($decimal\ years$, e.g., 3.2 years)

LandGEM is based on a first-order decomposition rate equation for quantifying emissions from the decomposition of landfilled waste in municipal solid waste (MSW) landfills. The software provides a relatively simple approach to estimating landfill gas emissions. Model defaults are based on empirical data from U.S. landfills. Field test data can also be used in place of model defaults when available. Further guidance on EPA test methods, Clean Air Act (CAA) regulations, and other guidance regarding landfill gas emissions and control technology requirements can be found at <http://www.epa.gov/ttnatw01/landfill/landflpg.html>.

LandGEM is considered a screening tool — the better the input data, the better the estimates. Often, there are limitations with the available data regarding waste quantity and composition, variation in design and operating practices over time, and changes occurring over time that impact the emissions potential. Changes to landfill operation, such as operating under wet conditions through leachate recirculation or other liquid additions, will result in generating more gas at a faster rate. Defaults for estimating emissions for this type of operation are being developed to include in LandGEM along with defaults for conventional landfills (no leachate or liquid additions) for developing emission inventories and determining CAA applicability. Refer to the Web site identified above for future updates.

Input Review

LANDFILL CHARACTERISTICS

Landfill Open Year **1990**
 Landfill Closure Year (with 80-year limit) **2069**
 Actual Closure Year (without limit) **2069**
 Have Model Calculate Closure Year? **No**
 Waste Design Capacity **293,868,000** megagrams

MODEL PARAMETERS

Methane Generation Rate, k **0.020** year⁻¹
 Potential Methane Generation Capacity, L₀ **100** m³/Mg
 NMOC Concentration **600** ppmv as hexane
 Methane Content **50** % by volume

GASES / POLLUTANTS SELECTED

Gas / Pollutant #1: **Total landfill gas**
 Gas / Pollutant #2: **Methane**
 Gas / Pollutant #3:
 Gas / Pollutant #4:

WASTE ACCEPTANCE RATES

Year	Waste Accepted		Waste-In-Place	
	(Mg/year)	(short tons/year)	(Mg)	(short tons)
1990	951	1,046	0	0
1991	12,317	13,549	951	1,046
1992	232,457	255,703	13,268	14,595
1993	422,881	465,169	245,725	270,298
1994	701,862	772,048	668,606	735,467
1995	872,433	959,676	1,370,468	1,507,515
1996	978,088	1,075,897	2,242,901	2,467,191
1997	1,072,472	1,179,719	3,220,989	3,543,088
1998	1,075,774	1,183,351	4,293,461	4,722,807
1999	1,357,672	1,493,439	5,369,235	5,906,159
2000	990,994	1,090,093	6,726,907	7,399,598
2001	1,115,501	1,227,051	7,717,901	8,489,691
2002	1,211,313	1,332,444	8,833,402	9,716,742
2003	1,130,491	1,243,540	10,044,715	11,049,187
2004	1,158,394	1,274,233	11,175,206	12,292,727
2005	1,073,269	1,180,596	12,333,600	13,566,960
2006	1,213,359	1,334,695	13,406,869	14,747,556
2007	1,344,293	1,478,722	14,620,228	16,082,251
2008	1,242,073	1,366,280	15,964,521	17,560,973
2009	1,170,570	1,287,627	17,206,594	18,927,253
2010	1,135,604	1,249,164	18,377,164	20,214,880
2011	1,114,064	1,225,470	19,512,768	21,464,045
2012	1,120,974	1,233,071	20,626,832	22,689,515
2013	1,171,632	1,288,795	21,747,806	23,922,587
2014	1,203,602	1,323,962	22,919,438	25,211,382
2015	1,096,499	1,206,149	24,123,040	26,535,344
2016	1,153,560	1,268,916	25,219,539	27,741,493
2017	1,246,732	1,371,405	26,373,099	29,010,409
2018	1,412,654	1,553,919	27,619,831	30,381,814
2019	1,426,781	1,569,459	29,032,485	31,935,734
2020	1,442,995	1,587,295	30,459,266	33,505,192
2021	1,407,043	1,547,748	31,902,261	35,092,487
2022	4,535,000	4,988,500	33,309,304	36,640,234
2023	4,535,000	4,988,500	37,844,304	41,628,734
2024	4,535,000	4,988,500	42,379,304	46,617,234
2025	4,535,000	4,988,500	46,914,304	51,605,734
2026	4,535,000	4,988,500	51,449,304	56,594,234
2027	4,535,000	4,988,500	55,984,304	61,582,734
2028	4,535,000	4,988,500	60,519,304	66,571,234
2029	4,535,000	4,988,500	65,054,304	71,559,734

WASTE ACCEPTANCE RATES (Continued)

Year	Waste Accepted		Waste-In-Place	
	(Mg/year)	(short tons/year)	(Mg)	(short tons)
2030	4,535,000	4,988,500	69,589,304	76,548,234
2031	4,535,000	4,988,500	74,124,304	81,536,734
2032	4,535,000	4,988,500	78,659,304	86,525,234
2033	4,535,000	4,988,500	83,194,304	91,513,734
2034	4,535,000	4,988,500	87,729,304	96,502,234
2035	4,535,000	4,988,500	92,264,304	101,490,734
2036	4,535,000	4,988,500	96,799,304	106,479,234
2037	4,535,000	4,988,500	101,334,304	111,467,734
2038	4,535,000	4,988,500	105,869,304	116,456,234
2039	4,535,000	4,988,500	110,404,304	121,444,734
2040	4,535,000	4,988,500	114,939,304	126,433,234
2041	4,535,000	4,988,500	119,474,304	131,421,734
2042	4,535,000	4,988,500	124,009,304	136,410,234
2043	4,535,000	4,988,500	128,544,304	141,398,734
2044	4,535,000	4,988,500	133,079,304	146,387,234
2045	4,535,000	4,988,500	137,614,304	151,375,734
2046	4,535,000	4,988,500	142,149,304	156,364,234
2047	4,535,000	4,988,500	146,684,304	161,352,734
2048	4,535,000	4,988,500	151,219,304	166,341,234
2049	4,535,000	4,988,500	155,754,304	171,329,734
2050	4,535,000	4,988,500	160,289,304	176,318,234
2051	4,535,000	4,988,500	164,824,304	181,306,734
2052	4,535,000	4,988,500	169,359,304	186,295,234
2053	4,535,000	4,988,500	173,894,304	191,283,734
2054	4,535,000	4,988,500	178,429,304	196,272,234
2055	4,535,000	4,988,500	182,964,304	201,260,734
2056	4,535,000	4,988,500	187,499,304	206,249,234
2057	4,535,000	4,988,500	192,034,304	211,237,734
2058	4,535,000	4,988,500	196,569,304	216,226,234
2059	4,535,000	4,988,500	201,104,304	221,214,734
2060	4,535,000	4,988,500	205,639,304	226,203,234
2061	4,535,000	4,988,500	210,174,304	231,191,734
2062	4,535,000	4,988,500	214,709,304	236,180,234
2063	4,535,000	4,988,500	219,244,304	241,168,734
2064	4,535,000	4,988,500	223,779,304	246,157,234
2065	4,535,000	4,988,500	228,314,304	251,145,734
2066	4,535,000	4,988,500	232,849,304	256,134,234
2067	4,535,000	4,988,500	237,384,304	261,122,734
2068	4,535,000	4,988,500	241,919,304	266,111,234
2069	4,535,000	4,988,500	246,454,304	271,099,734

Results

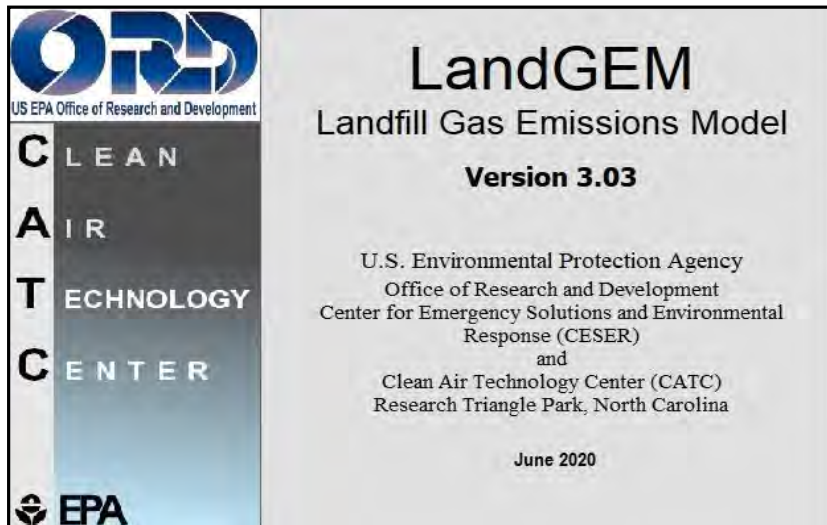
Year	Total landfill gas			Methane		
	(Mg/year)	(m ³ /year)	(av ft ³ /min)	(Mg/year)	(m ³ /year)	(av ft ³ /min)
1990	0	0	0	0	0	0
1991	4.708E+00	3.770E+03	2.533E-01	1.258E+00	1.885E+03	1.267E-01
1992	6.559E+01	5.252E+04	3.529E+00	1.752E+01	2.626E+04	1.764E+00
1993	1.215E+03	9.730E+05	6.538E+01	3.246E+02	4.865E+05	3.269E+01
1994	3.285E+03	2.630E+06	1.767E+02	8.773E+02	1.315E+06	8.836E+01
1995	6.694E+03	5.360E+06	3.602E+02	1.788E+03	2.680E+06	1.801E+02
1996	1.088E+04	8.713E+06	5.854E+02	2.906E+03	4.356E+06	2.927E+02
1997	1.551E+04	1.242E+07	8.343E+02	4.142E+03	6.209E+06	4.172E+02
1998	2.051E+04	1.642E+07	1.103E+03	5.478E+03	8.212E+06	5.517E+02
1999	2.543E+04	2.036E+07	1.368E+03	6.792E+03	1.018E+07	6.841E+02
2000	3.165E+04	2.534E+07	1.703E+03	8.453E+03	1.267E+07	8.513E+02
2001	3.593E+04	2.877E+07	1.933E+03	9.596E+03	1.438E+07	9.665E+02
2002	4.074E+04	3.262E+07	2.192E+03	1.088E+04	1.631E+07	1.096E+03
2003	4.593E+04	3.678E+07	2.471E+03	1.227E+04	1.839E+07	1.236E+03
2004	5.061E+04	4.053E+07	2.723E+03	1.352E+04	2.027E+07	1.362E+03
2005	5.535E+04	4.432E+07	2.978E+03	1.478E+04	2.216E+07	1.489E+03
2006	5.956E+04	4.770E+07	3.205E+03	1.591E+04	2.385E+07	1.602E+03
2007	6.439E+04	5.156E+07	3.464E+03	1.720E+04	2.578E+07	1.732E+03
2008	6.977E+04	5.587E+07	3.754E+03	1.864E+04	2.794E+07	1.877E+03
2009	7.454E+04	5.969E+07	4.010E+03	1.991E+04	2.984E+07	2.005E+03
2010	7.886E+04	6.315E+07	4.243E+03	2.106E+04	3.157E+07	2.121E+03
2011	8.292E+04	6.640E+07	4.461E+03	2.215E+04	3.320E+07	2.231E+03
2012	8.679E+04	6.950E+07	4.670E+03	2.318E+04	3.475E+07	2.335E+03
2013	9.062E+04	7.257E+07	4.876E+03	2.421E+04	3.628E+07	2.438E+03
2014	9.463E+04	7.577E+07	5.091E+03	2.528E+04	3.789E+07	2.546E+03
2015	9.871E+04	7.905E+07	5.311E+03	2.637E+04	3.952E+07	2.656E+03
2016	1.022E+05	8.183E+07	5.498E+03	2.730E+04	4.091E+07	2.749E+03
2017	1.059E+05	8.478E+07	5.696E+03	2.828E+04	4.239E+07	2.848E+03
2018	1.100E+05	8.804E+07	5.916E+03	2.937E+04	4.402E+07	2.958E+03
2019	1.148E+05	9.190E+07	6.175E+03	3.066E+04	4.595E+07	3.087E+03
2020	1.196E+05	9.574E+07	6.433E+03	3.194E+04	4.787E+07	3.216E+03
2021	1.243E+05	9.956E+07	6.690E+03	3.321E+04	4.978E+07	3.345E+03
2022	1.288E+05	1.032E+08	6.932E+03	3.441E+04	5.158E+07	3.466E+03
2023	1.487E+05	1.191E+08	8.002E+03	3.973E+04	5.955E+07	4.001E+03
2024	1.682E+05	1.347E+08	9.052E+03	4.494E+04	6.736E+07	4.526E+03
2025	1.874E+05	1.500E+08	1.008E+04	5.005E+04	7.502E+07	5.040E+03
2026	2.061E+05	1.650E+08	1.109E+04	5.505E+04	8.252E+07	5.544E+03
2027	2.245E+05	1.797E+08	1.208E+04	5.996E+04	8.987E+07	6.039E+03
2028	2.425E+05	1.942E+08	1.305E+04	6.477E+04	9.708E+07	6.523E+03
2029	2.601E+05	2.083E+08	1.400E+04	6.948E+04	1.042E+08	6.998E+03
2030	2.774E+05	2.222E+08	1.493E+04	7.410E+04	1.111E+08	7.463E+03
2031	2.944E+05	2.357E+08	1.584E+04	7.863E+04	1.179E+08	7.919E+03
2032	3.110E+05	2.490E+08	1.673E+04	8.307E+04	1.245E+08	8.367E+03
2033	3.273E+05	2.621E+08	1.761E+04	8.743E+04	1.310E+08	8.805E+03
2034	3.433E+05	2.749E+08	1.847E+04	9.169E+04	1.374E+08	9.234E+03
2035	3.589E+05	2.874E+08	1.931E+04	9.587E+04	1.437E+08	9.656E+03
2036	3.743E+05	2.997E+08	2.014E+04	9.997E+04	1.498E+08	1.007E+04
2037	3.893E+05	3.117E+08	2.095E+04	1.040E+05	1.559E+08	1.047E+04
2038	4.041E+05	3.235E+08	2.174E+04	1.079E+05	1.618E+08	1.087E+04
2039	4.185E+05	3.351E+08	2.252E+04	1.118E+05	1.676E+08	1.126E+04

Results (Continued)

Year	Total landfill gas			Methane		
	(Mg/year)	(m ³ /year)	(av ft ³ /min)	(Mg/year)	(m ³ /year)	(av ft ³ /min)
2040	4.327E+05	3.465E+08	2.328E+04	1.156E+05	1.732E+08	1.164E+04
2041	4.466E+05	3.576E+08	2.403E+04	1.193E+05	1.788E+08	1.201E+04
2042	4.602E+05	3.685E+08	2.476E+04	1.229E+05	1.842E+08	1.238E+04
2043	4.735E+05	3.792E+08	2.548E+04	1.265E+05	1.896E+08	1.274E+04
2044	4.866E+05	3.896E+08	2.618E+04	1.300E+05	1.948E+08	1.309E+04
2045	4.994E+05	3.999E+08	2.687E+04	1.334E+05	1.999E+08	1.343E+04
2046	5.120E+05	4.099E+08	2.754E+04	1.367E+05	2.050E+08	1.377E+04
2047	5.243E+05	4.198E+08	2.821E+04	1.400E+05	2.099E+08	1.410E+04
2048	5.363E+05	4.295E+08	2.886E+04	1.433E+05	2.147E+08	1.443E+04
2049	5.482E+05	4.389E+08	2.949E+04	1.464E+05	2.195E+08	1.475E+04
2050	5.598E+05	4.482E+08	3.012E+04	1.495E+05	2.241E+08	1.506E+04
2051	5.711E+05	4.573E+08	3.073E+04	1.526E+05	2.287E+08	1.536E+04
2052	5.823E+05	4.663E+08	3.133E+04	1.555E+05	2.331E+08	1.566E+04
2053	5.932E+05	4.750E+08	3.192E+04	1.584E+05	2.375E+08	1.596E+04
2054	6.039E+05	4.836E+08	3.249E+04	1.613E+05	2.418E+08	1.625E+04
2055	6.144E+05	4.920E+08	3.306E+04	1.641E+05	2.460E+08	1.653E+04
2056	6.247E+05	5.002E+08	3.361E+04	1.669E+05	2.501E+08	1.680E+04
2057	6.348E+05	5.083E+08	3.415E+04	1.696E+05	2.541E+08	1.708E+04
2058	6.446E+05	5.162E+08	3.468E+04	1.722E+05	2.581E+08	1.734E+04
2059	6.543E+05	5.240E+08	3.520E+04	1.748E+05	2.620E+08	1.760E+04
2060	6.638E+05	5.316E+08	3.572E+04	1.773E+05	2.658E+08	1.786E+04
2061	6.731E+05	5.390E+08	3.622E+04	1.798E+05	2.695E+08	1.811E+04
2062	6.823E+05	5.463E+08	3.671E+04	1.822E+05	2.732E+08	1.835E+04
2063	6.912E+05	5.535E+08	3.719E+04	1.846E+05	2.768E+08	1.859E+04
2064	7.000E+05	5.605E+08	3.766E+04	1.870E+05	2.802E+08	1.883E+04
2065	7.085E+05	5.674E+08	3.812E+04	1.893E+05	2.837E+08	1.906E+04
2066	7.170E+05	5.741E+08	3.857E+04	1.915E+05	2.871E+08	1.929E+04
2067	7.252E+05	5.807E+08	3.902E+04	1.937E+05	2.904E+08	1.951E+04
2068	7.333E+05	5.872E+08	3.945E+04	1.959E+05	2.936E+08	1.973E+04
2069	7.412E+05	5.936E+08	3.988E+04	1.980E+05	2.968E+08	1.994E+04
2070	7.490E+05	5.998E+08	4.030E+04	2.001E+05	2.999E+08	2.015E+04
2071	7.342E+05	5.879E+08	3.950E+04	1.961E+05	2.940E+08	1.975E+04
2072	7.196E+05	5.763E+08	3.872E+04	1.922E+05	2.881E+08	1.936E+04
2073	7.054E+05	5.648E+08	3.795E+04	1.884E+05	2.824E+08	1.898E+04
2074	6.914E+05	5.537E+08	3.720E+04	1.847E+05	2.768E+08	1.860E+04
2075	6.777E+05	5.427E+08	3.646E+04	1.810E+05	2.714E+08	1.823E+04
2076	6.643E+05	5.320E+08	3.574E+04	1.774E+05	2.660E+08	1.787E+04
2077	6.512E+05	5.214E+08	3.503E+04	1.739E+05	2.607E+08	1.752E+04
2078	6.383E+05	5.111E+08	3.434E+04	1.705E+05	2.555E+08	1.717E+04
2079	6.256E+05	5.010E+08	3.366E+04	1.671E+05	2.505E+08	1.683E+04
2080	6.132E+05	4.911E+08	3.299E+04	1.638E+05	2.455E+08	1.650E+04
2081	6.011E+05	4.813E+08	3.234E+04	1.606E+05	2.407E+08	1.617E+04
2082	5.892E+05	4.718E+08	3.170E+04	1.574E+05	2.359E+08	1.585E+04
2083	5.775E+05	4.625E+08	3.107E+04	1.543E+05	2.312E+08	1.554E+04
2084	5.661E+05	4.533E+08	3.046E+04	1.512E+05	2.267E+08	1.523E+04
2085	5.549E+05	4.443E+08	2.985E+04	1.482E+05	2.222E+08	1.493E+04
2086	5.439E+05	4.355E+08	2.926E+04	1.453E+05	2.178E+08	1.463E+04
2087	5.331E+05	4.269E+08	2.868E+04	1.424E+05	2.135E+08	1.434E+04
2088	5.226E+05	4.185E+08	2.812E+04	1.396E+05	2.092E+08	1.406E+04
2089	5.122E+05	4.102E+08	2.756E+04	1.368E+05	2.051E+08	1.378E+04
2090	5.021E+05	4.020E+08	2.701E+04	1.341E+05	2.010E+08	1.351E+04

Results (Continued)

Year	Total landfill gas			Methane		
	(Mg/year)	(m ³ /year)	(av ft ³ /min)	(Mg/year)	(m ³ /year)	(av ft ³ /min)
2091	4.921E+05	3.941E+08	2.648E+04	1.315E+05	1.970E+08	1.324E+04
2092	4.824E+05	3.863E+08	2.595E+04	1.289E+05	1.931E+08	1.298E+04
2093	4.728E+05	3.786E+08	2.544E+04	1.263E+05	1.893E+08	1.272E+04
2094	4.635E+05	3.711E+08	2.494E+04	1.238E+05	1.856E+08	1.247E+04
2095	4.543E+05	3.638E+08	2.444E+04	1.213E+05	1.819E+08	1.222E+04
2096	4.453E+05	3.566E+08	2.396E+04	1.189E+05	1.783E+08	1.198E+04
2097	4.365E+05	3.495E+08	2.348E+04	1.166E+05	1.748E+08	1.174E+04
2098	4.278E+05	3.426E+08	2.302E+04	1.143E+05	1.713E+08	1.151E+04
2099	4.194E+05	3.358E+08	2.256E+04	1.120E+05	1.679E+08	1.128E+04
2100	4.111E+05	3.292E+08	2.212E+04	1.098E+05	1.646E+08	1.106E+04
2101	4.029E+05	3.226E+08	2.168E+04	1.076E+05	1.613E+08	1.084E+04
2102	3.950E+05	3.163E+08	2.125E+04	1.055E+05	1.581E+08	1.062E+04
2103	3.871E+05	3.100E+08	2.083E+04	1.034E+05	1.550E+08	1.041E+04
2104	3.795E+05	3.039E+08	2.042E+04	1.014E+05	1.519E+08	1.021E+04
2105	3.720E+05	2.978E+08	2.001E+04	9.935E+04	1.489E+08	1.001E+04
2106	3.646E+05	2.919E+08	1.962E+04	9.738E+04	1.460E+08	9.808E+03
2107	3.574E+05	2.862E+08	1.923E+04	9.546E+04	1.431E+08	9.614E+03
2108	3.503E+05	2.805E+08	1.885E+04	9.357E+04	1.402E+08	9.423E+03
2109	3.434E+05	2.749E+08	1.847E+04	9.171E+04	1.375E+08	9.237E+03
2110	3.366E+05	2.695E+08	1.811E+04	8.990E+04	1.347E+08	9.054E+03
2111	3.299E+05	2.642E+08	1.775E+04	8.812E+04	1.321E+08	8.874E+03
2112	3.234E+05	2.589E+08	1.740E+04	8.637E+04	1.295E+08	8.699E+03
2113	3.170E+05	2.538E+08	1.705E+04	8.466E+04	1.269E+08	8.527E+03
2114	3.107E+05	2.488E+08	1.672E+04	8.299E+04	1.244E+08	8.358E+03
2115	3.045E+05	2.439E+08	1.638E+04	8.134E+04	1.219E+08	8.192E+03
2116	2.985E+05	2.390E+08	1.606E+04	7.973E+04	1.195E+08	8.030E+03
2117	2.926E+05	2.343E+08	1.574E+04	7.815E+04	1.171E+08	7.871E+03
2118	2.868E+05	2.297E+08	1.543E+04	7.661E+04	1.148E+08	7.715E+03
2119	2.811E+05	2.251E+08	1.512E+04	7.509E+04	1.126E+08	7.562E+03
2120	2.755E+05	2.206E+08	1.483E+04	7.360E+04	1.103E+08	7.413E+03
2121	2.701E+05	2.163E+08	1.453E+04	7.214E+04	1.081E+08	7.266E+03
2122	2.647E+05	2.120E+08	1.424E+04	7.072E+04	1.060E+08	7.122E+03
2123	2.595E+05	2.078E+08	1.396E+04	6.932E+04	1.039E+08	6.981E+03
2124	2.544E+05	2.037E+08	1.369E+04	6.794E+04	1.018E+08	6.843E+03
2125	2.493E+05	1.996E+08	1.341E+04	6.660E+04	9.982E+07	6.707E+03
2126	2.444E+05	1.957E+08	1.315E+04	6.528E+04	9.785E+07	6.574E+03
2127	2.395E+05	1.918E+08	1.289E+04	6.399E+04	9.591E+07	6.444E+03
2128	2.348E+05	1.880E+08	1.263E+04	6.272E+04	9.401E+07	6.317E+03
2129	2.302E+05	1.843E+08	1.238E+04	6.148E+04	9.215E+07	6.192E+03
2130	2.256E+05	1.806E+08	1.214E+04	6.026E+04	9.032E+07	6.069E+03



Summary Report

Landfill Name or Identifier: Roosevelt Regional Landfill - 2 of 2

Date: Wednesday, June 28, 2023

Description/Comments:

Waste intake rates for years 1990 through 2002 provided by Republic Services. Waste intake for 2003 through 2019 from the 2019 Emission Calcs for WEIRS spreadsheet prepared by WCG. Parameters : User defined $k = 0.02$ year-1 and inventory arid area $L_o = 100$ m³/Mg

About LandGEM:

First-Order Decomposition Rate Equation:

$$Q_{CH_4} = \sum_{i=1}^n \sum_{j=0.1}^1 kL_o \left(\frac{M_i}{10} \right) e^{-kt_{ij}}$$

Where,

Q_{CH_4} = annual methane generation in the year of the calculation ($m^3/year$)

i = 1-year time increment

n = (year of the calculation) - (initial year of waste acceptance)

j = 0.1-year time increment

k = methane generation rate ($year^{-1}$)

L_o = potential methane generation capacity (m^3/Mg)

M_i = mass of waste accepted in the i^{th} year (Mg)

t_{ij} = age of the j^{th} section of waste mass M_i accepted in the i^{th} year (decimal years , e.g., 3.2 years)

LandGEM is based on a first-order decomposition rate equation for quantifying emissions from the decomposition of landfilled waste in municipal solid waste (MSW) landfills. The software provides a relatively simple approach to estimating landfill gas emissions. Model defaults are based on empirical data from U.S. landfills. Field test data can also be used in place of model defaults when available. Further guidance on EPA test methods, Clean Air Act (CAA) regulations, and other guidance regarding landfill gas emissions and control technology requirements can be found at <http://www.epa.gov/ttnatw01/landfill/landflpg.html>.

LandGEM is considered a screening tool — the better the input data, the better the estimates. Often, there are limitations with the available data regarding waste quantity and composition, variation in design and operating practices over time, and changes occurring over time that impact the emissions potential. Changes to landfill operation, such as operating under wet conditions through leachate recirculation or other liquid additions, will result in generating more gas at a faster rate. Defaults for estimating emissions for this type of operation are being developed to include in LandGEM along with defaults for conventional landfills (no leachate or liquid additions) for developing emission inventories and determining CAA applicability. Refer to the Web site identified above for future updates.

Input Review

LANDFILL CHARACTERISTICS

Landfill Open Year **2070**
 Landfill Closure Year (with 80-year limit) **2079**
 Actual Closure Year (without limit) **2079**
 Have Model Calculate Closure Year? **No**
 Waste Design Capacity **293,868,000** megagrams

MODEL PARAMETERS

Methane Generation Rate, k **0.020** year⁻¹
 Potential Methane Generation Capacity, L₀ **100** m³/Mg
 NMOC Concentration **600** ppmv as hexane
 Methane Content **50** % by volume

GASES / POLLUTANTS SELECTED

Gas / Pollutant #1: **Total landfill gas**
 Gas / Pollutant #2: **Methane**
 Gas / Pollutant #3:
 Gas / Pollutant #4:

WASTE ACCEPTANCE RATES

Year	Waste Accepted		Waste-In-Place	
	(Mg/year)	(short tons/year)	(Mg)	(short tons)
2070	4,535,000	4,988,500	0	0
2071	4,535,000	4,988,500	4,535,000	4,988,500
2072	4,535,000	4,988,500	9,070,000	9,977,000
2073	4,535,000	4,988,500	13,605,000	14,965,500
2074	4,535,000	4,988,500	18,140,000	19,954,000
2075	4,535,000	4,988,500	22,675,000	24,942,500
2076	4,535,000	4,988,500	27,210,000	29,931,000
2077	4,535,000	4,988,500	31,745,000	34,919,500
2078	4,535,000	4,988,500	36,280,000	39,908,000
2079	2,063,696	2,270,066	40,815,000	44,896,500
2080	0	0	42,878,696	47,166,566
2081	0	0	42,878,696	47,166,566
2082	0	0	42,878,696	47,166,566
2083	0	0	42,878,696	47,166,566
2084	0	0	42,878,696	47,166,566
2085	0	0	42,878,696	47,166,566
2086	0	0	42,878,696	47,166,566
2087	0	0	42,878,696	47,166,566
2088	0	0	42,878,696	47,166,566
2089	0	0	42,878,696	47,166,566
2090	0	0	42,878,696	47,166,566
2091	0	0	42,878,696	47,166,566
2092	0	0	42,878,696	47,166,566
2093	0	0	42,878,696	47,166,566
2094	0	0	42,878,696	47,166,566
2095	0	0	42,878,696	47,166,566
2096	0	0	42,878,696	47,166,566
2097	0	0	42,878,696	47,166,566
2098	0	0	42,878,696	47,166,566
2099	0	0	42,878,696	47,166,566

Results

Year	Total landfill gas			Methane		
	(Mg/year)	(m ³ /year)	(av ft ³ /min)	(Mg/year)	(m ³ /year)	(av ft ³ /min)
2070	0	0	0	0	0	0
2071	2.245E+04	1.798E+07	1.208E+03	5.997E+03	8.989E+06	6.040E+02
2072	4.446E+04	3.560E+07	2.392E+03	1.188E+04	1.780E+07	1.196E+03
2073	6.603E+04	5.287E+07	3.552E+03	1.764E+04	2.644E+07	1.776E+03
2074	8.717E+04	6.980E+07	4.690E+03	2.328E+04	3.490E+07	2.345E+03
2075	1.079E+05	8.640E+07	5.805E+03	2.882E+04	4.320E+07	2.903E+03
2076	1.282E+05	1.027E+08	6.898E+03	3.425E+04	5.133E+07	3.449E+03
2077	1.481E+05	1.186E+08	7.969E+03	3.957E+04	5.931E+07	3.985E+03
2078	1.676E+05	1.342E+08	9.020E+03	4.478E+04	6.712E+07	4.510E+03
2079	1.868E+05	1.496E+08	1.005E+04	4.989E+04	7.478E+07	5.024E+03
2080	1.933E+05	1.548E+08	1.040E+04	5.163E+04	7.739E+07	5.200E+03
2081	1.895E+05	1.517E+08	1.019E+04	5.061E+04	7.586E+07	5.097E+03
2082	1.857E+05	1.487E+08	9.992E+03	4.961E+04	7.435E+07	4.996E+03
2083	1.820E+05	1.458E+08	9.794E+03	4.862E+04	7.288E+07	4.897E+03
2084	1.784E+05	1.429E+08	9.600E+03	4.766E+04	7.144E+07	4.800E+03
2085	1.749E+05	1.400E+08	9.410E+03	4.672E+04	7.002E+07	4.705E+03
2086	1.714E+05	1.373E+08	9.224E+03	4.579E+04	6.864E+07	4.612E+03
2087	1.680E+05	1.346E+08	9.041E+03	4.489E+04	6.728E+07	4.520E+03
2088	1.647E+05	1.319E+08	8.862E+03	4.400E+04	6.595E+07	4.431E+03
2089	1.615E+05	1.293E+08	8.686E+03	4.313E+04	6.464E+07	4.343E+03
2090	1.583E+05	1.267E+08	8.514E+03	4.227E+04	6.336E+07	4.257E+03
2091	1.551E+05	1.242E+08	8.346E+03	4.143E+04	6.211E+07	4.173E+03
2092	1.520E+05	1.218E+08	8.181E+03	4.061E+04	6.088E+07	4.090E+03
2093	1.490E+05	1.193E+08	8.019E+03	3.981E+04	5.967E+07	4.009E+03
2094	1.461E+05	1.170E+08	7.860E+03	3.902E+04	5.849E+07	3.930E+03
2095	1.432E+05	1.147E+08	7.704E+03	3.825E+04	5.733E+07	3.852E+03
2096	1.404E+05	1.124E+08	7.552E+03	3.749E+04	5.620E+07	3.776E+03
2097	1.376E+05	1.102E+08	7.402E+03	3.675E+04	5.508E+07	3.701E+03
2098	1.349E+05	1.080E+08	7.256E+03	3.602E+04	5.399E+07	3.628E+03
2099	1.322E+05	1.058E+08	7.112E+03	3.531E+04	5.292E+07	3.556E+03
2100	1.296E+05	1.038E+08	6.971E+03	3.461E+04	5.188E+07	3.486E+03
2101	1.270E+05	1.017E+08	6.833E+03	3.392E+04	5.085E+07	3.417E+03
2102	1.245E+05	9.968E+07	6.698E+03	3.325E+04	4.984E+07	3.349E+03
2103	1.220E+05	9.771E+07	6.565E+03	3.259E+04	4.885E+07	3.283E+03
2104	1.196E+05	9.577E+07	6.435E+03	3.195E+04	4.789E+07	3.218E+03
2105	1.172E+05	9.388E+07	6.308E+03	3.132E+04	4.694E+07	3.154E+03
2106	1.149E+05	9.202E+07	6.183E+03	3.070E+04	4.601E+07	3.091E+03
2107	1.126E+05	9.020E+07	6.060E+03	3.009E+04	4.510E+07	3.030E+03
2108	1.104E+05	8.841E+07	5.940E+03	2.949E+04	4.421E+07	2.970E+03
2109	1.082E+05	8.666E+07	5.823E+03	2.891E+04	4.333E+07	2.911E+03
2110	1.061E+05	8.494E+07	5.707E+03	2.834E+04	4.247E+07	2.854E+03
2111	1.040E+05	8.326E+07	5.594E+03	2.777E+04	4.163E+07	2.797E+03
2112	1.019E+05	8.161E+07	5.484E+03	2.722E+04	4.081E+07	2.742E+03
2113	9.990E+04	8.000E+07	5.375E+03	2.669E+04	4.000E+07	2.688E+03
2114	9.792E+04	7.841E+07	5.269E+03	2.616E+04	3.921E+07	2.634E+03
2115	9.599E+04	7.686E+07	5.164E+03	2.564E+04	3.843E+07	2.582E+03
2116	9.409E+04	7.534E+07	5.062E+03	2.513E+04	3.767E+07	2.531E+03
2117	9.222E+04	7.385E+07	4.962E+03	2.463E+04	3.692E+07	2.481E+03
2118	9.040E+04	7.238E+07	4.864E+03	2.415E+04	3.619E+07	2.432E+03
2119	8.861E+04	7.095E+07	4.767E+03	2.367E+04	3.548E+07	2.384E+03

APPENDIX E
EMISSION CALCULATIONS

POTENTIAL EMISSIONS SUMMARY

NOTICE OF CONSTRUCTION MODIFICATION

ROOSEVELT REGIONAL LANDFILL - KLINKITAT COUNTY, WASHINGTON

Emissions Estimations of Criteria Pollutants:

Pollutant	Emissions		
	tons/hr	tons/day	tons/yr
Volatile Organic Compound	4.20E-03	0.10	36.82

Emissions Estimations of Toxic Air Pollutants:

Pollutant	Emissions		
	lb/hr	lb/day	lb/yr
1,2,3-Trimethylbenzene	0.02	0.53	195.21
1,2,4-Trimethylbenzene	0.14	3.35	1,223.88
1,2-Dichloroethane (ethylene dichloride)	0.02	0.42	151.85
1,3,5-Trimethylbenzene	0.06	1.40	512.48
1,4-Dichlorobenzene	0.03	0.72	261.44
1,4-Dioxane	3.61E-03	0.09	31.64
2-Propanol (Isopropyl alcohol)	0.61	14.60	5,328.39
Benzene	0.07	1.61	587.22
Carbon Disulfide	9.39E-03	0.23	82.22
Carbonyl Sulfide	0.04	0.86	313.42
Chlorobenzene	5.91E-03	0.14	51.78
Chlorodifluoromethane	1.09E-02	0.26	95.33
Chloroethane (ethyl chloride)	3.12E-03	0.07	27.33
Cumene (Isopropylbenzene)	0.03	0.66	241.40
Cyclohexane	0.05	1.14	415.51
Ethylbenzene	0.38	9.14	3,335.35
Hexane	0.05	1.20	437.57
Hydrogen Sulfide	2.65	63.65	23,231.02
m & p Xylenes	0.82	19.66	7,176.96
Methanol	0.44	10.61	3,873.75
Methyl butyl ketone (2-Hexanone)	7.73E-03	0.19	67.71
Methyl Ethyl Ketone (2-Butanone)	0.82	19.67	7,181.02
Methyl Isobutyl Ketone (4-Methyl-2-pentanone)	0.10	2.46	896.29
Methylene Dichloride	9.79E-03	0.23	85.77
Naphthalene	0.23	5.46	1,991.87
n-Hexane	0.04	0.97	352.96
o-Xylene	0.26	6.15	2,245.40
Perchloroethylene (tetrachloroethylene)	0.05	1.15	420.53
Styrene	0.04	0.85	309.69
Tetrahydrofuran	0.21	5.15	1,879.20
Toluene	0.95	22.87	8,347.68
Trichloroethylene (trichloroethene)	1.29E-02	0.31	112.79
Vinyl Chloride	4.38E-03	0.11	38.40

**POTENTIAL EMISSION CALCULATIONS FOR LANDFILL
NOTICE OF CONSTRUCTION MODIFICATION
ROOSEVELT REGIONAL LANDFILL - KLICKITAT COUNTY, WASHINGTON**

Required:

Determine the potential emissions from the landfill at the maximum LFG generation. Estimates for VOCs and TAPs will be calculated utilizing the U.S. EPA's *Compilation of Air Pollutant Emission Factors* (AP-42), Section 2.4 for Municipal Solid Waste (MSW) Landfills.

References:

1. AP-42 equations used to calculate emissions of VOCs and TAPs:

A. Section 2.4.4.1, Equation 3 is used to calculate the total uncontrolled emission rate of LFG pollutants in m³/yr using the following equation:

$$Q_p = 2 Q_{CH_4} C_p / 1,000,000$$

Where:

- Q_p = emission rate of pollutant p, m³/yr
- Q_{CH_4} = CH₄ generation rate, m³/yr
- C_p = concentration of pollutant p in LFG, ppm_v
- 2 = assumes LFG contains 50% CH₄ (per AP-42)

B. Section 2.4.4.1, Equation 4 is used to calculate the total uncontrolled mass emissions per year of LFG pollutants in kg/yr using the following equation:

$$UM_p = (Q_p MW_p P) / (1,000 R T)$$

Where:

- UM_p = uncontrolled or collected and not combusted mass emission rate of pollutant p, kg/yr
- Q_p = emission rate of pollutant p, m³/yr
- MW_p = molecular weight of pollutant p, g/g-mol
- P = atmospheric pressure, atm
- R = universal gas constant, m³-atm/gmol-K
- T = standard temperature (77°F), Kelvin

2. Conversion Factors:

35.315	ft ³	=	1 m ³
525,600	min	=	1 yr
6.719E-05	scfm CH ₄	=	1 m ³ /yr
2,000	lbs	=	1 ton
8,760	hr	=	1 yr
1.10E-03	tons	=	1 kg
77	°F	=	298 K

**POTENTIAL EMISSION CALCULATIONS FOR LANDFILL
NOTICE OF CONSTRUCTION MODIFICATION
ROOSEVELT REGIONAL LANDFILL - KLICKITAT COUNTY, WASHINGTON**

Assumptions:

1. Estimated maximum CH₄ generation rate from the landfill predicted by the EPA's Landfill Gas Emissions Model (LandGEM) version 3.03 is:

$$Q_{CH_4,max} = \frac{325,268,116}{21,855} \begin{matrix} m^3/yr \text{ of } CH_4 \\ scfm \text{ of } CH_4 \end{matrix}$$

Assuming LFG contains 50% CH₄, the maximum LFG generation rate from the landfill is:

$$Q_{LFG,max} = 43,709 \quad scfm \text{ of LFG}$$

2. The peak LFG production before the proposed expansion is determined to be 33,254 scfm. As such, the increase for this proposed expansion project is calculated as:

$$\begin{aligned} Q_{LFG,max,proposed} &= 43,709 && scfm \text{ of LFG} \\ Q_{LFG,max,existing} &= 33,254 && scfm \text{ of LFG} \\ Q_{LFG,max,increase} &= 10,455 && scfm \text{ of LFG} \\ Q_{CH_4,max,increase} &= 5,227 && scfm \text{ of } CH_4 \end{aligned}$$

3. As per AP-42, Section 2.4.4.2, an average of 75% of LFG generated is commonly assumed to be collectable and controllable. The remainder of the LFG is released as fugitive emissions. However, the site's GCCS is assumed to collect approximately 80% of the LFG generated within the landfill in order to be conservative. Based on the maximum LFG generated by the landfill, the uncontrollable (or fugitive) portion of LFG and CH₄ are:

$$\begin{aligned} \text{(i)} \quad Q_{LFG,FUG} &= Q_{LFG,max,increase} (20\%) \\ Q_{LFG,FUG} &= 2,091 && scfm \text{ of LFG} \\ \text{(ii)} \quad Q_{CH_4,FUG} &= Q_{CH_4,max,increase} (20\%) \\ Q_{CH_4,FUG} &= 1,045 && scfm \text{ of } CH_4 \\ &= 15,560,215 && m^3/yr \text{ of } CH_4 \end{aligned}$$

4. The following conditions are assumed in calculating the emissions of VOCs and TAPs using Equation 4 provided in Reference 1.

$$\begin{aligned} P &= 1 && atm \\ R &= 8.205E-05 && m^3-atm/gmol-K \\ T &= 298 && K \end{aligned}$$

**POTENTIAL EMISSION CALCULATIONS FOR LANDFILL
NOTICE OF CONSTRUCTION MODIFICATION
ROOSEVELT REGIONAL LANDFILL - KCLICKITAT COUNTY, WASHINGTON**

VOC and TAP Speciated Emissions:

Estimated potential landfill fugitive CH₄ emission rate: 15,560,215 m³/yr

Speciated LFG Compounds	CAS No.	TAP	VOC	MW (g/g-mol)	Conc. ^a (ppm _v)	Fugitive Emissions ^b					
						lb/hr	lb/day	lb/yr	tons/hr	tons/day	tons/yr
1,2,3-Trimethylbenzene	526-73-8	X	X	120.19	0.58	0.02	0.53	195.21	1.11E-05	2.67E-04	0.10
1,2,4-Trimethylbenzene	95-63-6	X	X	120.19	3.63	0.14	3.35	1,223.88	6.99E-05	1.68E-03	0.61
1,2-Dichloroethane (ethylene dichloride)	107-06-2	X	X	98.96	0.55	0.02	0.42	151.85	8.67E-06	2.08E-04	0.08
1,3,5-Trimethylbenzene	108-67-8	X	X	120.19	1.52	0.06	1.40	512.48	2.93E-05	7.02E-04	0.26
1,4-Dichlorobenzene	95-50-1	X	X	147.00	0.63	0.03	0.72	261.44	1.49E-05	3.58E-04	0.13
1,4-Dioxane	123-91-1	X	X	88.11	0.13	3.61E-03	0.09	31.64	1.81E-06	4.33E-05	0.02
1-Butene	106-98-9		X	56.11	0.85	1.53E-02	0.37	134.09	7.65E-06	1.84E-04	0.07
1-Hexene	592-41-6			84.16	0.08	2.18E-03	0.05	19.12	1.09E-06	2.62E-05	9.56E-03
1-Pentene	109-67-1		X	70.13	0.18	3.93E-03	0.09	34.43	1.97E-06	4.72E-05	0.02
2,2,4-Trimethylpentane	540-84-1		X	114.23	0.90	0.03	0.79	289.67	1.65E-05	3.97E-04	0.14
2,2-Dimethylbutane	75-83-2			86.18	0.36	9.88E-03	0.24	86.54	4.94E-06	1.19E-04	0.04
2,3,4-Trimethylpentane	565-75-3		X	114.23	0.31	1.13E-02	0.27	99.34	5.67E-06	1.36E-04	0.05
2,3-Dimethylbutane	79-29-8			86.18	0.17	4.61E-03	0.11	40.37	2.30E-06	5.53E-05	0.02
2,3-Dimethylpentane	565-59-3			100.20	1.12	0.04	0.86	314.81	1.80E-05	4.31E-04	0.16
2,4-Dimethylpentane	108-08-7			100.20	0.17	5.29E-03	0.13	46.38	2.65E-06	6.35E-05	0.02
2-Methylheptane	592-27-8			114.23	0.81	0.03	0.71	259.55	1.48E-05	3.56E-04	0.13
2-Methylhexane	591-76-4			100.20	1.42	0.05	1.09	399.13	2.28E-05	5.47E-04	0.20
2-Methylpentane	107-83-5			86.18	0.82	0.02	0.54	197.03	1.12E-05	2.70E-04	0.10
2-Methylthiophene	554-14-3			98.17	0.42	1.32E-02	0.32	115.94	6.62E-06	1.59E-04	0.06
2-Propanol (Isopropyl alcohol)	67-63-0	X	X	60.11	31.60	0.61	14.60	5,328.39	3.04E-04	7.30E-03	2.66
3-Methylheptane	589-81-1			114.23	0.72	0.03	0.64	232.00	1.32E-05	3.18E-04	0.12
3-Methylhexane	589-34-4			100.20	2.38	0.08	1.83	668.97	3.82E-05	9.16E-04	0.33
3-Methylpentane	96-14-0			86.18	0.68	0.02	0.45	164.87	9.41E-06	2.26E-04	0.08
3-Methylthiophene	616-44-4			98.17	0.20	6.16E-03	0.15	53.98	3.08E-06	7.39E-05	0.03
4-Ethyltoluene	622-96-8		X	120.19	1.30	0.05	1.20	438.30	2.50E-05	6.00E-04	0.22
Acetone	67-64-1			58.08	28.70	0.53	12.81	4,675.96	2.67E-04	6.41E-03	2.34
Acetylene	74-86-2		X	26.04	0.30	2.52E-03	0.06	22.06	1.26E-06	3.02E-05	1.10E-02
Benzene	71-43-2	X	X	78.11	2.68	0.07	1.61	587.22	3.35E-05	8.04E-04	0.29
Carbon Disulfide	75-15-0	X	X	76.13	0.39	9.39E-03	0.23	82.22	4.69E-06	1.13E-04	0.04
Carbonyl Sulfide	463-58-1	X	X	60.07	1.86	0.04	0.86	313.42	1.79E-05	4.29E-04	0.16
Chlorobenzene	108-90-7	X	X	112.56	0.16	5.91E-03	0.14	51.78	2.96E-06	7.09E-05	0.03
Chlorodifluoromethane	75-45-6	X		86.47	0.39	1.09E-02	0.26	95.33	5.44E-06	1.31E-04	0.05
Chloroethane (ethyl chloride)	75-00-3	X	X	64.52	0.15	3.12E-03	0.07	27.33	1.56E-06	3.74E-05	1.37E-02
cis-1,2-Dichloroethene	156-59-2		X	96.95	0.70	0.02	0.52	190.10	1.09E-05	2.60E-04	0.10
cis-2-Butene	590-18-1		X	56.10	0.36	6.52E-03	0.16	57.13	3.26E-06	7.83E-05	0.03
cis-2-Pentene	627-20-3		X	70.13	0.09	2.11E-03	0.05	18.49	1.06E-06	2.53E-05	9.25E-03
Cumene (Isopropylbenzene)	98-82-8	X		120.19	0.72	0.03	0.66	241.40	1.38E-05	3.31E-04	0.12
Cyclohexane	110-82-7	X	X	84.16	1.76	0.05	1.14	415.51	2.37E-05	5.69E-04	0.21
Cyclopentane	287-92-3		X	70.10	0.40	8.93E-03	0.21	78.26	4.47E-06	1.07E-04	0.04
Dichlorodifluoromethane	75-71-8			120.91	0.39	1.49E-02	0.36	130.92	7.47E-06	1.79E-04	0.07
Dichlorofluoromethane	75-43-4		X	102.92	0.52	0.02	0.41	149.55	8.54E-06	2.05E-04	0.07
Dimethyl Sulfide	75-18-3		X	62.13	6.25	0.12	2.98	1,089.29	6.22E-05	1.49E-03	0.54
Ethane	74-84-0			30.07	6.10	0.06	1.41	514.55	2.94E-05	7.05E-04	0.26
Ethanol	64-17-5		X	46.08	79.00	1.17	27.98	10,211.79	5.83E-04	1.40E-02	5.11
Ethyl Acetate	141-78-6		X	88.11	4.41	0.12	2.99	1,090.00	6.22E-05	1.49E-03	0.54

**POTENTIAL EMISSION CALCULATIONS FOR LANDFILL
NOTICE OF CONSTRUCTION MODIFICATION
ROOSEVELT REGIONAL LANDFILL - KLICKITAT COUNTY, WASHINGTON**

Speciated LFG Compounds	CAS No.	TAP	VOC	MW (g/g-mol)	Conc. ^a (ppm _v)	Fugitive Emissions ^b					
						lb/hr	lb/day	lb/yr	tons/hr	tons/day	tons/yr
Ethyl Mercaptan	75-08-1		X	62.13	0.35	7.04E-03	0.17	61.70	3.52E-06	8.45E-05	0.03
Ethylbenzene	100-41-4	X	X	106.16	11.20	0.38	9.14	3,335.35	1.90E-04	4.57E-03	1.67
Ethylene	74-85-1		X	28.05	8.86	0.08	1.91	697.15	3.98E-05	9.55E-04	0.35
Fluorotrichloromethane	75-69-4		X	137.38	0.16	7.21E-03	0.17	63.20	3.61E-06	8.66E-05	0.03
Heptane	142-82-5		X	100.21	3.70	0.12	2.85	1,040.10	5.94E-05	1.42E-03	0.52
Hexane	110-54-3	X	X	86.18	1.81	0.05	1.20	437.57	2.50E-05	5.99E-04	0.22
Hydrogen Sulfide	7783-06-4	X		34.08	243.00	2.65	63.65	23,231.02	1.33E-03	3.18E-02	11.62
Isobutane	106-97-8		X	58.12	8.82	0.16	3.94	1,437.99	8.21E-05	1.97E-03	0.72
Isobutyl Mercaptan	513-44-0			90.18	0.41	1.18E-02	0.28	103.47	5.91E-06	1.42E-04	0.05
Isopentane	78-78-4		X	72.15	5.62	0.13	3.12	1,137.46	6.49E-05	1.56E-03	0.57
Isoprene	78-79-5			68.12	0.10	2.27E-03	0.05	19.87	1.13E-06	2.72E-05	9.94E-03
Isopropyl Mercaptan	75-33-2			76.16	7.61	0.19	4.45	1,625.83	9.28E-05	2.23E-03	0.81
m & p Xylenes	1330-20-7	X	X	106.16	24.10	0.82	19.66	7,176.96	4.10E-04	9.83E-03	3.59
m-Diethylbenzene	141-93-5			134.22	0.86	0.04	0.89	323.42	1.85E-05	4.43E-04	0.16
Methanol	67-56-1	X	X	32.04	43.10	0.44	10.61	3,873.75	2.21E-04	5.31E-03	1.94
Methyl butyl ketone (2-Hexanone)	591-78-6	X	X	100.16	0.24	0.01	0.19	67.71	3.86E-06	9.28E-05	0.03
Methyl Ethyl Ketone (2-Butanone)	78-93-3	X	X	72.11	35.50	0.82	19.67	7,181.02	4.10E-04	9.84E-03	3.59
Methyl Isobutyl Ketone (4-Methyl-2-pentanone)	108-10-1	X	X	100.16	3.19	0.10	2.46	896.29	5.12E-05	1.23E-03	0.45
Methyl Mercaptan	74-93-1		X	48.11	6.62	0.10	2.45	893.42	5.10E-05	1.22E-03	0.45
Methylcyclohexane	108-87-2			98.19	2.41	0.08	1.82	663.79	3.79E-05	9.09E-04	0.33
Methylcyclopentane	96-37-7			84.16	0.68	0.02	0.44	160.77	9.18E-06	2.20E-04	0.08
Methylene Dichloride	75-09-2	X		84.93	0.36	9.79E-03	0.23	85.77	4.90E-06	1.17E-04	0.04
m-Ethyltoluene	620-14-4			120.20	3.43	0.13	3.17	1,156.54	6.60E-05	1.58E-03	0.58
Naphthalene	91-20-3	X		128.17	5.54	0.23	5.46	1,991.87	1.14E-04	2.73E-03	1.00
n-Butane	106-97-8		X	58.12	7.54	0.14	3.37	1,229.30	7.02E-05	1.68E-03	0.61
n-Butyl Mercaptan	109-79-5			90.19	0.13	3.87E-03	0.09	33.90	1.94E-06	4.64E-05	0.02
n-Decane	124-18-5			142.29	6.29	0.29	6.88	2,510.66	1.43E-04	3.44E-03	1.26
n-Dodecane	112-40-3			170.33	0.77	0.04	1.01	368.87	2.11E-05	5.05E-04	0.18
n-Hexane	110-54-3	X	X	86.18	1.46	0.04	0.97	352.96	2.01E-05	4.84E-04	0.18
n-Octane	111-65-9			114.23	2.43	0.09	2.13	778.66	4.44E-05	1.07E-03	0.39
Nonane	111-84-2			128.20	5.80	0.24	5.71	2,085.83	1.19E-04	2.86E-03	1.04
n-Pentane	109-66-0		X	72.15	2.86	0.07	1.59	578.85	3.30E-05	7.93E-04	0.29
n-Propyl Mercaptan	107-03-9			76.16	0.23	5.54E-03	0.13	48.50	2.77E-06	6.64E-05	0.02
n-Propylbenzene	103-65-1			120.20	1.12	0.04	1.03	377.65	2.16E-05	5.17E-04	0.19
n-Undecane	1120-21-4			156.31	3.29	0.16	3.95	1,442.60	8.23E-05	1.98E-03	0.72
o-Ethyltoluene	611-14-3			120.19	0.80	0.03	0.74	269.39	1.54E-05	3.69E-04	0.13
o-Xylene	1330-20-7	X	X	106.16	7.54	0.26	6.15	2,245.40	1.28E-04	3.08E-03	1.12
p-Diethylbenzene	25340-17-4			134.22	1.26	0.05	1.30	474.41	2.71E-05	6.50E-04	0.24
Perchloroethylene (tetrachloroethylene)	127-18-4	X		165.83	0.90	0.05	1.15	420.53	2.40E-05	5.76E-04	0.21
Propane	74-98-6		X	44.09	56.80	0.80	19.25	7,025.07	4.01E-04	9.62E-03	3.51
Propene/Propylene	115-07-1			42.08	17.50	0.24	5.66	2,065.74	1.18E-04	2.83E-03	1.03
sec-Butyl Mercaptan/Thiophene	513-53-1			90.18	7.23	0.21	5.01	1,828.99	1.04E-04	2.51E-03	0.91
Styrene	100-42-5	X	X	104.15	1.06	0.04	0.85	309.69	1.77E-05	4.24E-04	0.15
tert-Butyl Mercaptan	75-66-1			90.18	0.45	1.31E-02	0.31	114.60	6.54E-06	1.57E-04	0.06
Tetrahydrofuran	109-99-9	X	X	72.11	9.29	0.21	5.15	1,879.20	1.07E-04	2.57E-03	0.94
Tetrahydrothiophene	110-01-0		X	88.10	9.20E-05	2.60E-06	6.23E-05	0.02	1.30E-09	3.11E-08	1.14E-05
Thiophenol	108-98-5			110.19	0.33	1.15E-02	0.28	100.46	5.73E-06	1.38E-04	0.05
Toluene	108-88-3	X	X	92.13	32.30	0.95	22.87	8,347.68	4.76E-04	1.14E-02	4.17

**POTENTIAL EMISSION CALCULATIONS FOR LANDFILL
NOTICE OF CONSTRUCTION MODIFICATION
ROOSEVELT REGIONAL LANDFILL - KLICKITAT COUNTY, WASHINGTON**

Speciated LFG Compounds	CAS No.	TAP	VOC	MW (g/g-mol)	Conc. ^a (ppm _v)	Fugitive Emissions ^b					
						lb/hr	lb/day	lb/yr	tons/hr	tons/day	tons/yr
trans-1,3-Dichloropropene	10061-02-6		X	110.97	0.12	4.41E-03	0.11	38.60	2.20E-06	5.29E-05	0.02
trans-2-Butene	624-64-6		X	57.11	0.42	7.66E-03	7.66E-03	67.13	3.83E-06	9.20E-05	0.03
trans-2-Pentene	646-04-8		X	70.13	0.11	2.47E-03	0.06	21.64	1.24E-06	2.96E-05	1.08E-02
Trichloroethylene (trichloroethene)	79-01-6	X	X	131.40	0.31	1.29E-02	0.31	112.79	6.44E-06	1.55E-04	0.06
Vinyl Chloride	75-01-4	X	X	62.50	0.22	4.38E-03	0.11	38.40	2.19E-06	5.26E-05	0.02
Total VOCs						--	--	--	4.20E-03	0.10	36.82
Total TAPs						--	--	--	4.08E-03	0.10	35.75

^a Concentration for LFG compounds obtained from site-specific analysis.

^b These emissions were calculated by using the equations # 3 and # 4 from AP-42, Section 2.4 (11/98), the site-specific concentration for each compound, and the fugitive methane emission rate.

APPENDIX F
MODELING RESULTS

AERSCREEN RESULTS

TITLE: RRLF

***** AREA PARAMETERS *****

SOURCE EMISSION RATE:	0.1260 g/s	1.000 lb/hr
AREA EMISSION RATE:	0.904E-07 g/(s-m2)	0.718E-06 lb/(hr-m2)
AREA HEIGHT:	0.00 meters	0.00 feet
AREA SOURCE LONG SIDE:	1524.00 meters	5000.00 feet
AREA SOURCE SHORT SIDE:	914.40 meters	3000.00 feet
INITIAL VERTICAL DIMENSION:	1524.00 meters	5000.00 feet
RURAL OR URBAN:	RURAL	
INITIAL PROBE DISTANCE =	5000. meters	16404. feet

***** BUILDING DOWNWASH PARAMETERS *****

BUILDING DOWNWASH NOT USED FOR NON-POINT SOURCES

***** FLOW SECTOR ANALYSIS *****

25 meter receptor spacing: 1. meters - 5000. meters

MAXIMUM IMPACT RECEPTOR

Zo	SURFACE	1-HR CONC	RADIAL	DIST	TEMPORAL
SECTOR	ROUGHNESS	(ug/m3)	(deg)	(m)	PERIOD
1*	0.500	5.755	30	875.0	WIN

* = worst case diagonal

***** MAKEMET METEOROLOGY PARAMETERS *****

MIN/MAX TEMPERATURE: 249.8 / 310.9 (K)

MINIMUM WIND SPEED: 0.5 m/s

ANEMOMETER HEIGHT: 10.000 meters

SURFACE CHARACTERISTICS INPUT: AERMET SEASONAL TABLES

DOMINANT SURFACE PROFILE: Deciduous Forest

DOMINANT CLIMATE TYPE: Average Moisture

DOMINANT SEASON: Winter

ALBEDO: 0.50

BOWEN RATIO: 1.50

ROUGHNESS LENGTH: 0.500 (meters)

SURFACE FRICTION VELOCITY (U*) NOT ADJUSTED

METEOROLOGY CONDITIONS USED TO PREDICT OVERALL MAXIMUM IMPACT

YR MO DY JDY HR
-- -- -- -- --

10 01 02 2 12

H0 U* W* DT/DZ ZICNV ZIMCH M-O LEN Z0 BOWEN ALBEDO REF WS

2.11 0.085 0.100 0.020 16. 57. -24.8 0.500 1.50 0.50 0.50

HT REF TA HT

10.0 280.4 2.0

***** AERSCREEN AUTOMATED DISTANCES *****
OVERALL MAXIMUM CONCENTRATIONS BY DISTANCE

DIST (m)	MAXIMUM 1-HR CONC (ug/m3)	DIST (m)	MAXIMUM 1-HR CONC (ug/m3)
1.00	3.109	2525.00	5.103
25.00	3.183	2550.00	5.100

50.00	3.260	2575.00	5.096
75.00	3.337	2600.00	5.093
100.00	3.413	2625.00	5.089
125.00	3.489	2650.00	5.086
150.00	3.565	2675.00	5.082
175.00	3.642	2700.00	5.079
200.00	3.719	2725.00	5.075
225.00	3.796	2750.00	5.072
250.00	3.872	2775.00	5.068
275.00	3.949	2800.00	5.065
300.00	4.027	2825.00	5.061
325.00	4.104	2850.00	5.058
350.00	4.181	2875.00	5.054
375.00	4.259	2900.00	5.051
400.00	4.332	2925.00	5.047
425.00	4.405	2950.00	5.044
450.00	4.479	2975.00	5.040
475.00	4.552	2999.99	5.036
500.00	4.625	3025.00	5.033
525.00	4.698	3050.00	5.029
550.00	4.772	3075.00	5.025
575.00	4.845	3100.00	5.022
600.00	4.919	3125.00	5.018
625.00	4.996	3150.00	5.014
650.00	5.074	3175.00	5.011
675.00	5.151	3200.00	5.007
700.00	5.228	3225.00	5.003
725.00	5.306	3250.00	5.000
750.00	5.383	3275.00	4.996
775.00	5.460	3300.00	4.993
800.00	5.537	3325.00	4.989
825.00	5.615	3350.00	4.985
850.00	5.679	3375.00	4.981
875.00	5.755	3400.00	4.978
900.00	5.723	3425.00	4.974
925.00	5.700	3450.00	4.970
950.00	5.630	3475.00	4.966
975.00	5.565	3500.00	4.963
1000.00	5.512	3525.00	4.959
1025.00	5.469	3550.00	4.955
1050.00	5.434	3575.00	4.951
1075.00	5.379	3600.00	4.948
1100.00	5.368	3625.00	4.944
1125.00	5.358	3650.00	4.940
1150.00	5.349	3675.00	4.937
1175.00	5.340	3700.00	4.933
1200.00	5.331	3725.00	4.929
1225.00	5.323	3750.00	4.926
1250.00	5.316	3775.00	4.922
1275.00	5.309	3800.00	4.918

1300.00	5.303	3825.00	4.914
1325.00	5.297	3850.00	4.911
1350.00	5.291	3875.00	4.907
1375.00	5.285	3900.00	4.905
1400.00	5.279	3925.00	4.902
1425.00	5.273	3950.00	4.899
1450.00	5.267	3975.00	4.896
1475.00	5.262	4000.00	4.893
1500.00	5.256	4025.00	4.890
1525.00	5.250	4050.00	4.888
1550.00	5.244	4075.00	4.885
1575.00	5.239	4100.00	4.882
1600.00	5.233	4125.00	4.879
1625.00	5.228	4149.99	4.876
1650.00	5.222	4175.00	4.873
1675.00	5.216	4200.00	4.870
1700.00	5.211	4225.00	4.867
1725.00	5.205	4250.00	4.864
1750.00	5.200	4275.00	4.861
1775.00	5.195	4300.00	4.858
1800.00	5.191	4325.00	4.855
1825.00	5.189	4350.00	4.852
1850.00	5.186	4375.01	4.849
1875.00	5.183	4400.00	4.846
1899.99	5.181	4425.00	4.843
1925.00	5.178	4450.00	4.840
1950.00	5.175	4475.00	4.836
1975.00	5.172	4500.00	4.833
2000.01	5.170	4525.00	4.830
2025.00	5.167	4550.00	4.827
2050.00	5.164	4575.00	4.824
2075.00	5.161	4600.00	4.820
2100.00	5.158	4625.00	4.817
2124.99	5.155	4650.00	4.814
2150.00	5.152	4675.00	4.811
2175.00	5.148	4700.00	4.808
2200.00	5.145	4725.00	4.805
2225.00	5.142	4750.00	4.801
2250.00	5.139	4775.00	4.798
2275.00	5.136	4800.00	4.794
2300.00	5.133	4825.00	4.791
2325.00	5.129	4850.00	4.788
2350.00	5.126	4875.00	4.787
2375.00	5.123	4900.00	4.785
2400.00	5.120	4925.00	4.784
2425.00	5.116	4950.00	4.782
2449.99	5.113	4975.00	4.781
2475.00	5.110	5000.00	4.779
2500.00	5.106		

 ***** AERSCREEN MAXIMUM IMPACT SUMMARY *****

3-hour, 8-hour, and 24-hour scaled concentrations are equal to the 1-hour concentration as referenced in SCREENING PROCEDURES FOR ESTIMATING THE AIR QUALITY IMPACT OF STATIONARY SOURCES, REVISED (Section 4.5.4)
 Report number EPA-454/R-92-019
http://www.epa.gov/scram001/guidance_permit.htm
 under Screening Guidance

CALCULATION PROCEDURE	MAXIMUM 1-HOUR CONC (ug/m3)	SCALED 3-HOUR CONC (ug/m3)	SCALED 8-HOUR CONC (ug/m3)	SCALED 24-HOUR CONC (ug/m3)	SCALED ANNUAL CONC (ug/m3)
FLAT TERRAIN	5.770	5.770	5.770	5.770	N/A
DISTANCE FROM SOURCE	880.00 meters				
IMPACT AT THE AMBIENT BOUNDARY	3.109	3.109	3.109	3.109	N/A
DISTANCE FROM SOURCE	1.00 meters				

FIRST TIER REVIEW – AERMOD

FIRST TIER REVIEW–AERMOD
REVISION TO NOTICE OF CONSTRUCTION APPLICATION
ROOSEVELT REGIONAL LANDFILL
REGIONAL DISPOSAL COMPANY

Summary

When performing the WAC 173-460-150 Analysis at the Roosevelt Regional Landfill located in Klickitat County, Washington for the proposed revision, emissions of the compounds listed in Table 1 below exceeded the small quantity emission rate (SQER) for the respective averaging period.

Compounds	CAS No.	Emission Rates (lb/hr)
1,1 - Dichloroethane (ethylidene dichloride)	107-06-2	0.02
1,4 - Dichlorobenzene	95-50-1	0.03
Benzene	71-43-2	0.07
Ethylbenzene	100-41-4	0.38
Naphthalene	91-20-3	0.16
Perchloroethylene (tetrachloroethylene)	127-18-4	0.05
Hydrogen Sulfide (H ₂ S)	7783-06-	1.06

As such, the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) was used to determine if the maximum ground level concentration (GLC_{max}) of these compounds is below the acceptable source impact level (ASIL). The modeling parameters and results are provided in the sections below. The modeling output files and dispersion maps are provided at the end of this report.

AERMOD Parameters

AERMOD Source Type Justification

AERMOD Version 19191 dispersion model allows emission units to be represented as point, line, area or volume sources. In this dispersion modeling analysis, the landfill working face was modeled as an area source since the emissions occur at the surface (ground-level) which will disperse in two dimensions with little or no plume rise.

Table 1. Modeling Parameters

Model ID	Source Type	Area (Acres)
LFUG	Area	917

FIRST TIER REVIEW–AERMOD
REVISION TO NOTICE OF CONSTRUCTION APPLICATION
ROOSEVELT REGIONAL LANDFILL
REGIONAL DISPOSAL COMPANY

Meteorological Data

The annual meteorological data used in the dispersion modeling analysis is from year 1992 for Weather Station 24157, which is located at Spokane International Airport. The surface and upper air data was obtained from WebMet and processed using AERMET Version No. 19191.

Terrain Data

The United States Geological Survey (USGS) 75M Digital Elevation Model (DEM) data was obtained from WebGIS and processed using AERMAP Version 18081.

Receptor Grid

The receptor grid spacing used in the modeling analysis, as recommended in the State of Washington Department of Ecology (DOE) *Guidance on First, Second, and Third Tier Review of Air Toxics* document, is provided in Table 1 below:

Table 2. Receptor Grid Spacing

Distance from Source (m)	Grid Spacing (m)
0-150	12.5
150-400	25
400-900	50
900-2,000	100
2,000-4,500	300
>4,500	600

Additional Dispersion Modeling Options

- No building downwash
- Rural area dispersion option
- Elevated terrain (default option)

FIRST TIER REVIEW–AERMOD
REVISION TO NOTICE OF CONSTRUCTION APPLICATION
ROOSEVELT REGIONAL LANDFILL
REGIONAL DISPOSAL COMPANY

AERMOD Dispersion Modeling Results

Table 3. First Tier Review for A Revision to Notice of Construction Application at Roosevelt Regional Landfill Comparison of GLC_{max} from AERMOD to ASIL

Chemical Species [CAS]	Averaging Period	ASIL (µg/m ³)	GLC _{max} (µg/m ³)	Is GLC _{max} < ASIL?
1,1 - Dichloroethane (ethylidene dichloride)	Annual	0.038	0.00354	Yes
1,4 - Dichlorobenzene	Annual	0.091	0.00530	Yes
Benzene	Annual	0.13	0.01238	Yes
Ethylbenzene	Annual	0.40	0.06718	Yes
Naphthalene	Annual	0.029	0.02829	Yes
Perchloroethylene (tetrachloroethylene)	Annual	0.16	0.00884	Yes
Hydrogen Sulfide (H ₂ S)	24-HR	2.00	1.97540	Yes

Since all emissions are below the appropriate ASIL and all other compounds are below *de minimis* emission levels as specified in WAC 173-460-150 (SQER), the revision project meets the requirements of the first tier review.

AERMOD MOELING OUTPUT FILES AND DISPERSION MAPS

Control Pathway

AERMOD

Dispersion Options

Titles R o s s e v e l t 2 0 2 3 M o d	
Dispersion Options <input checked="" type="checkbox"/> Regulatory Default <input type="checkbox"/> Non-Default Options	Dispersion Coefficient Rural
	Output Type <input checked="" type="checkbox"/> Concentration <input type="checkbox"/> Total Deposition (Dry & Wet) <input type="checkbox"/> Dry Deposition <input type="checkbox"/> Wet Deposition
	Plume Depletion <input type="checkbox"/> Dry Removal <input type="checkbox"/> Wet Removal
	Output Warnings <input type="checkbox"/> No Output Warnings <input type="checkbox"/> Non-fatal Warnings for Non-sequential Met Data

Pollutant / Averaging Time / Terrain Options

Pollutant Type OTHER - 107062	Exponential Decay Option not available
Averaging Time Options Hours <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 6 <input type="checkbox"/> 8 <input type="checkbox"/> 12 <input type="checkbox"/> 24 <input type="checkbox"/> Month <input type="checkbox"/> Period <input checked="" type="checkbox"/> Annual	Terrain Height Options <input type="checkbox"/> Flat <input checked="" type="checkbox"/> Elevated SO: Meters RE: Meters TG: Meters
Flagpole Receptors <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Default Height = 0.00 m	

Source Pathway

AERMOD

Building Downwash Information

Option not in use

Emission Rate Units for Output

For Concentration

Unit Factor:	1E6
Emission Unit Label:	GRAMS/SEC
Concentration Unit Label:	MICROGRAMS/M**3

Meteorology Pathway

AERMOD

Met Input Data

Surface Met Data Filename: ..\..\Roosevelt\roosevelt2.SFC Format Type: Default AERMET format

Profile Met Data Filename: ..\..\Roosevelt\roosevelt2.PFL Format Type: Default AERMET format

Wind Speed <input type="checkbox"/> Wind Speeds are Vector Mean (Not Scalar Means)	Wind Direction Rotation Adjustment [deg]:
--	---

Potential Temperature Profile Base Elevation above MSL (for Primary Met Tower): 2,358.00 [m]
--

Meteorological Station Data

Stations	Station No.	Year	X Coordinate [m]	Y Coordinate [m]	Station Name
Surface		1992			SPOKANE/INT'L ARPT
Upper Air		1992			SPOKANE/INT'L ARPT

Data Period

Data Period to Process Start Date: 1/1/1992 Start Hour: 1 End Date: 12/31/1992 End Hour: 24
--

Wind Speed Categories

Stability Category	Wind Speed [m/s]	Stability Category	Wind Speed [m/s]
A	1.54	D	8.23
B	3.09	E	10.8
C	5.14	F	No Upper Bound

Results Summary

Roosevelt 2023 Mod

107062 - Concentration - Source Group: ALL

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
ANNUAL		0.00354		719536.75	5077562.50	466.56	0.00	534.00	

PROJECT TITLE:

**Annual Results for 1,1 - Dichloroethane (107-06-2)
Roosevelt Regional Landfill**

COMMENTS:

SOURCES:

1

RECEPTORS:

135105

OUTPUT TYPE:

Concentration

MAX:

3.5E-03 ug/m³

COMPANY NAME:

WCG

MODELER:

M. Moore

DATE:

6/21/2023

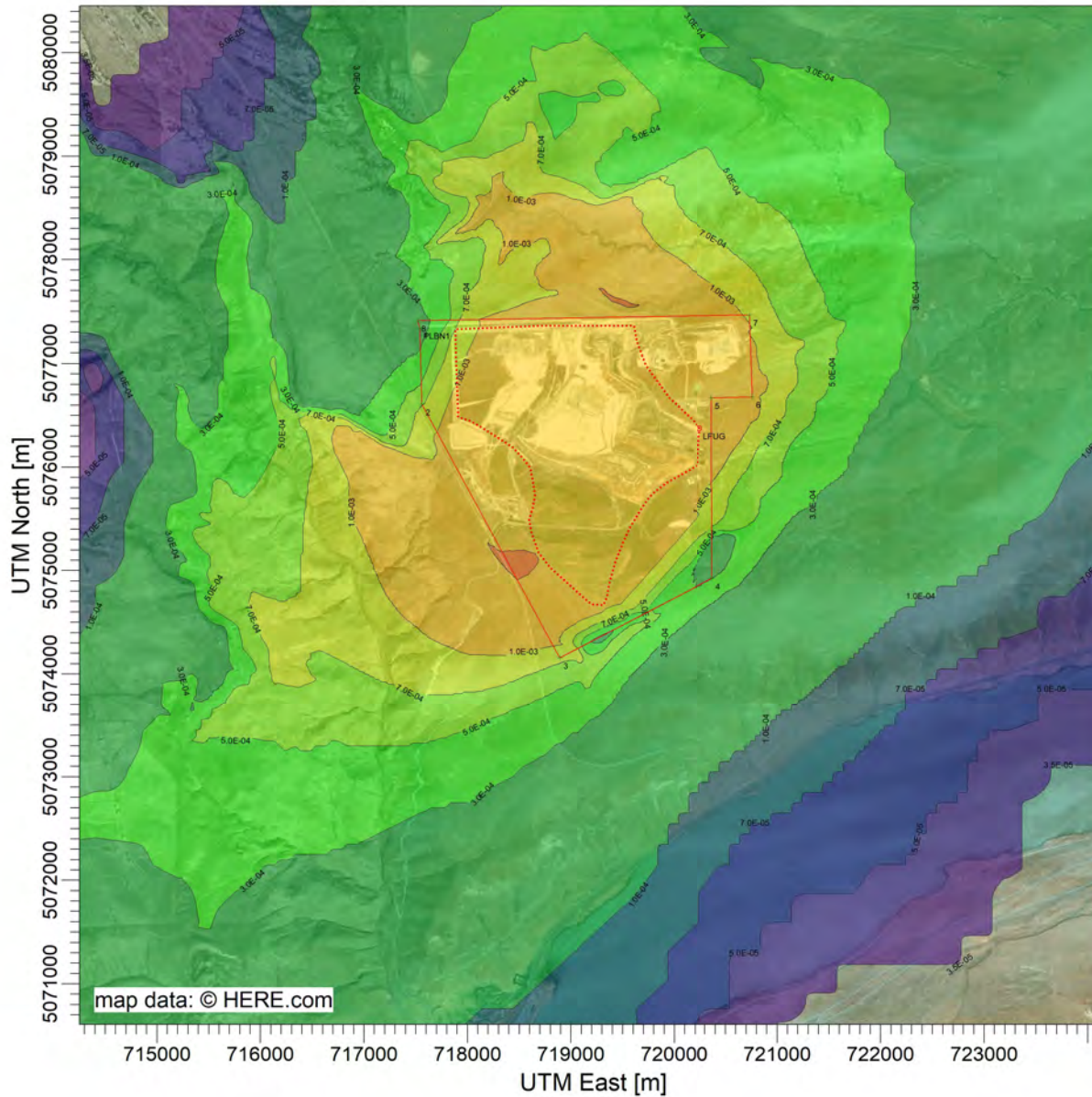
SCALE:

1:67,016

0

2 km

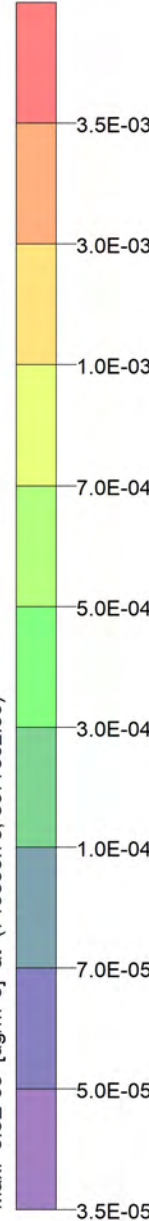
PROJECT NO.:



ug/m³

PLOT FILE OF ANNUAL VALUES AVERAGED ACROSS 1 YEARS FOR SOURCE GROUP: ALL

Max: 3.5E-03 [ug/m³] at (719536.75, 5077562.50)



Results Summary

Roosevelt 2023 Mod

95501 - Concentration - Source Group: ALL

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
ANNUAL		0.00530	ug/m^3	719511.75	5077575.00	465.42	0.00	534.00	

PROJECT TITLE:

**Annual Results for 1,4 - Dichlorobenzene (95-50-1)
Roosevelt Regional Landfill**

COMMENTS:

SOURCES:

1

RECEPTORS:

135105

OUTPUT TYPE:

Concentration

MAX:

5.3E-03 ug/m³

COMPANY NAME:

WCG

MODELER:

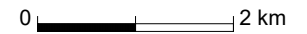
M. Moore

DATE:

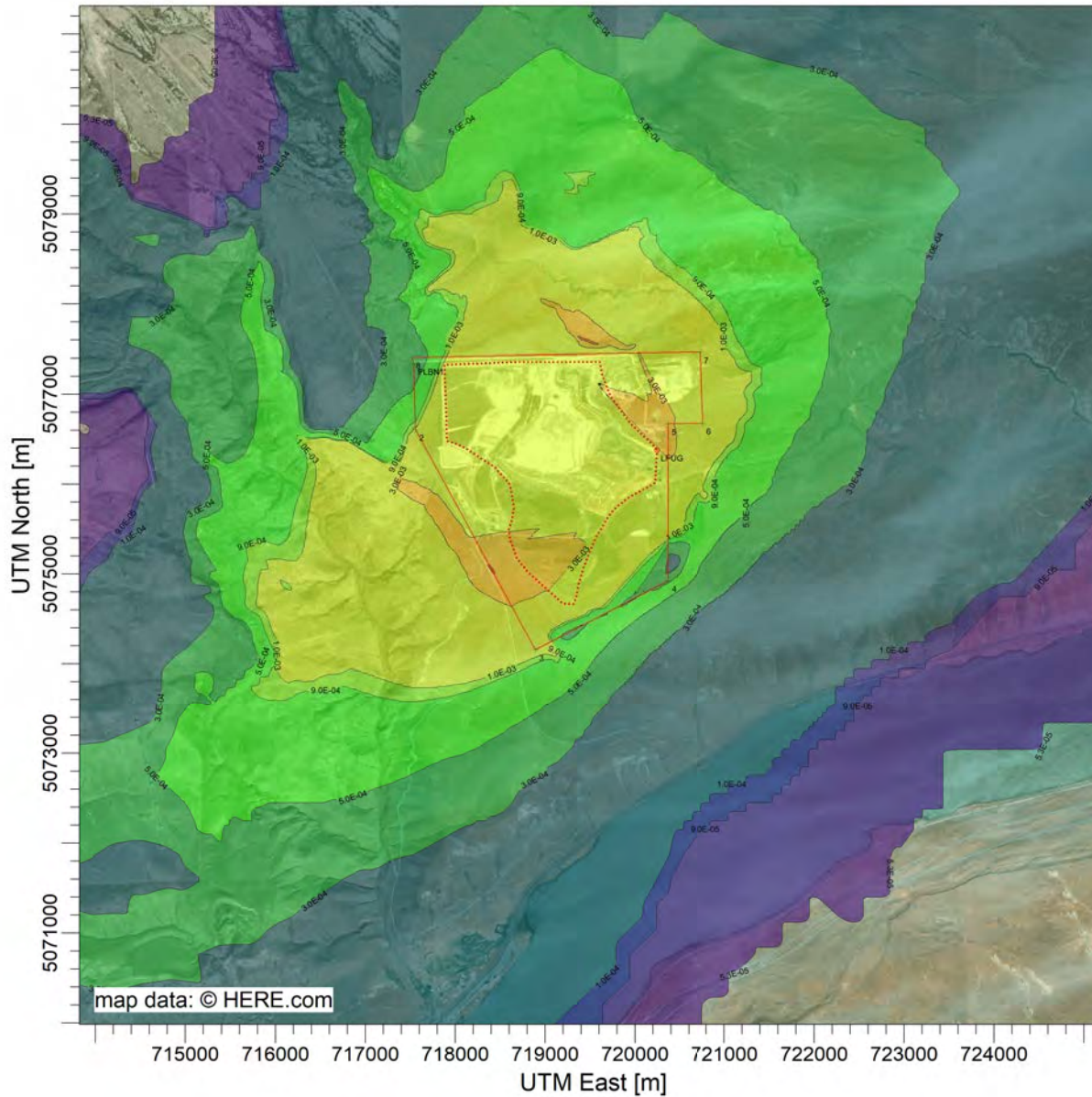
6/20/2023

SCALE:

1:77,131



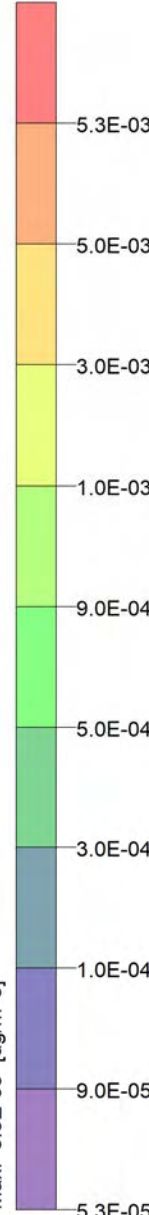
PROJECT NO.:



ug/m³

PLOT FILE OF ANNUAL VALUES AVERAGED ACROSS 1 YEARS FOR SOURCE GROUP: ALL

Max: 5.3E-03 [ug/m³]



Results Summary

Roosevelt 2023 Mod

71432 - Concentration - Source Group: ALL

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
ANNUAL		0.01238	ug/m ³	719536.75	5077562.50	466.56	0.00	534.00	

PROJECT TITLE:

**Annual Results for Benzene (71-43-2)
Roosevelt Regional Landfill**

COMMENTS:

SOURCES:

1

RECEPTORS:

135105

OUTPUT TYPE:

Concentration

MAX:

1.2E-02 ug/m³

COMPANY NAME:

WCG

MODELER:

M. Moore

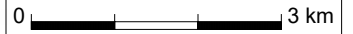
DATE:

6/20/2023

SCALE:

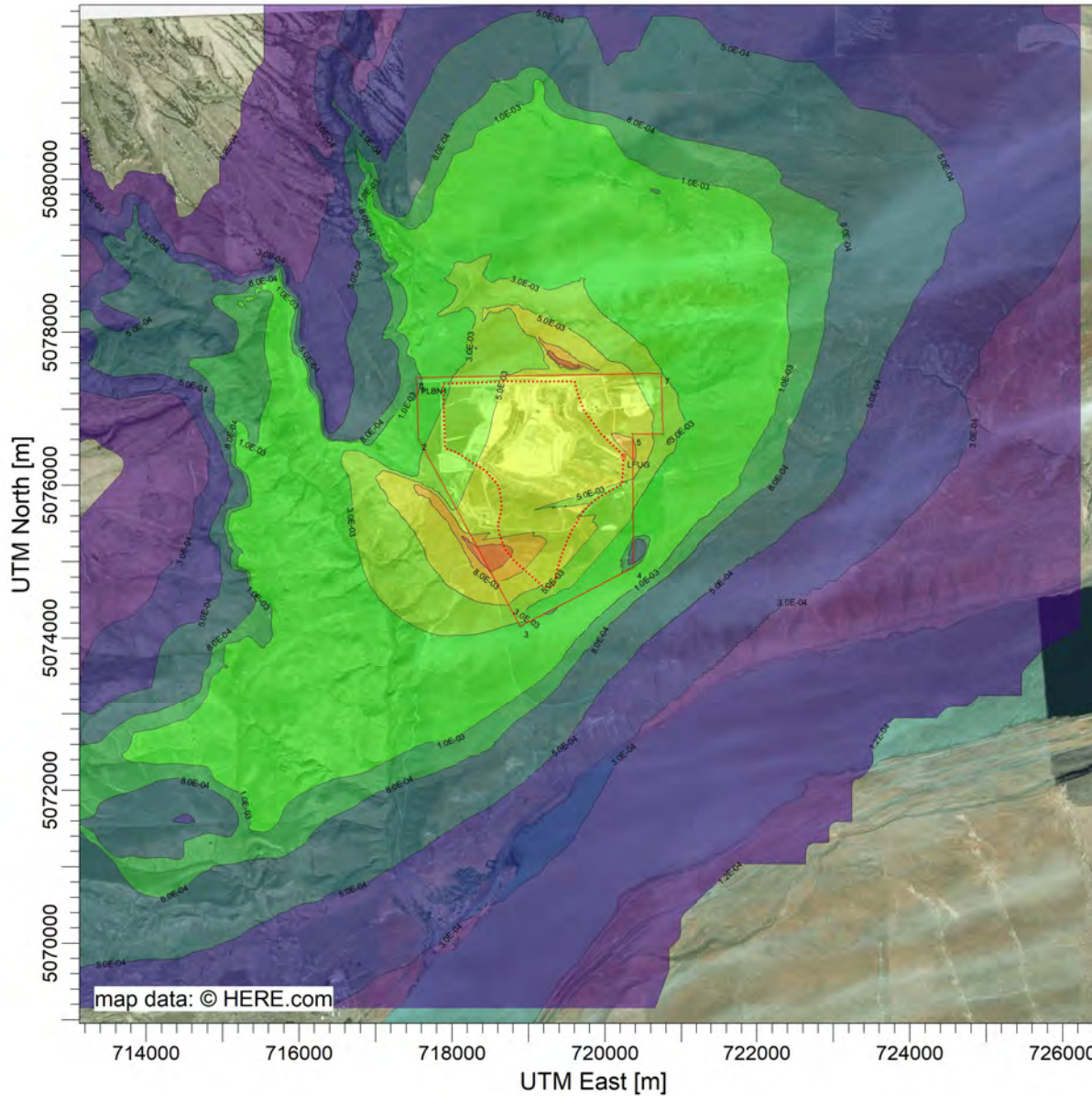
1:90,742

0



3 km

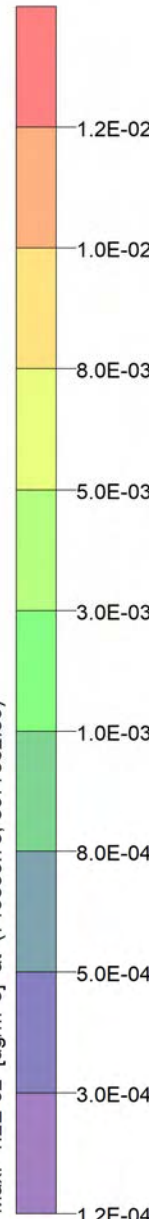
PROJECT NO.:



ug/m³

PLOT FILE OF ANNUAL VALUES AVERAGED ACROSS 1 YEARS FOR SOURCE GROUP: ALL

Max: 1.2E-02 [ug/m³] at (719536.75, 5077562.50)



Results Summary

Roosevelt 2023 Mod

100414 - Concentration - Source Group: ALL

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
ANNUAL		0.06718	ug/m^3	719536.75	5077562.50	466.56	0.00	534.00	

PROJECT TITLE:

**Annual Results for Ethylbenzene (100-41-4)
Roosevelt Regional Landfill**

COMMENTS:

SOURCES:

1

RECEPTORS:

135105

OUTPUT TYPE:

Concentration

MAX:

6.7E-02 ug/m³

COMPANY NAME:

WCG

MODELER:

M. Moore

DATE:

6/20/2023

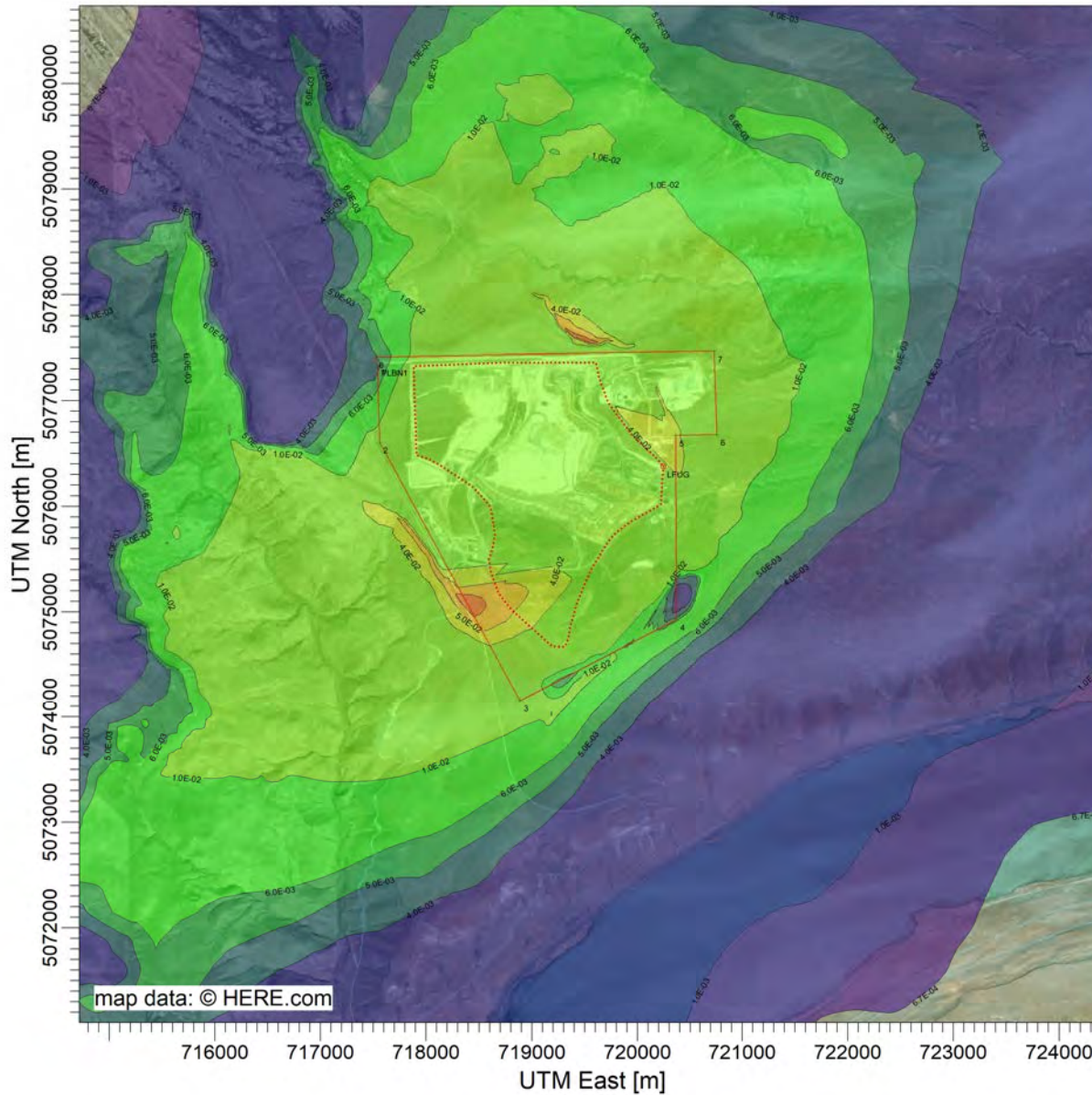
SCALE:

1:65,560

0

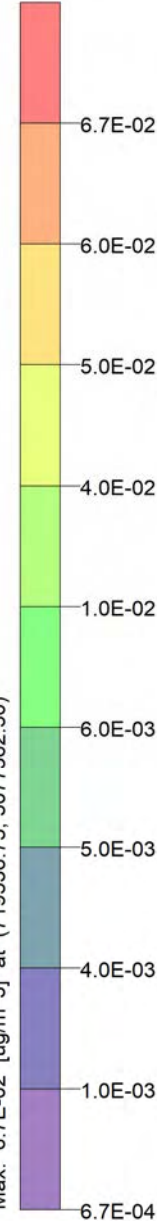
2 km

PROJECT NO.:



ug/m³

PLOT FILE OF ANNUAL VALUES AVERAGED ACROSS 1 YEARS FOR SOURCE GROUP: ALL
Max: 6.7E-02 [ug/m³] at (719536.75, 5077562.50)



Results Summary

Roosevelt 2023 Mod

91203 - Concentration - Source Group: ALL

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
ANNUAL		0.02829	ug/m^3	719536.75	5077562.50	466.56	0.00	534.00	

PROJECT TITLE:

**Annual Results for Naphthalene (91-20-3)
Roosevelt Regional Landfill**

COMMENTS:

SOURCES:

1

RECEPTORS:

135105

OUTPUT TYPE:

Concentration

MAX:

2.8E-02 ug/m³

COMPANY NAME:

WCG

MODELER:

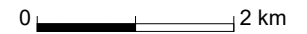
M. Moore

DATE:

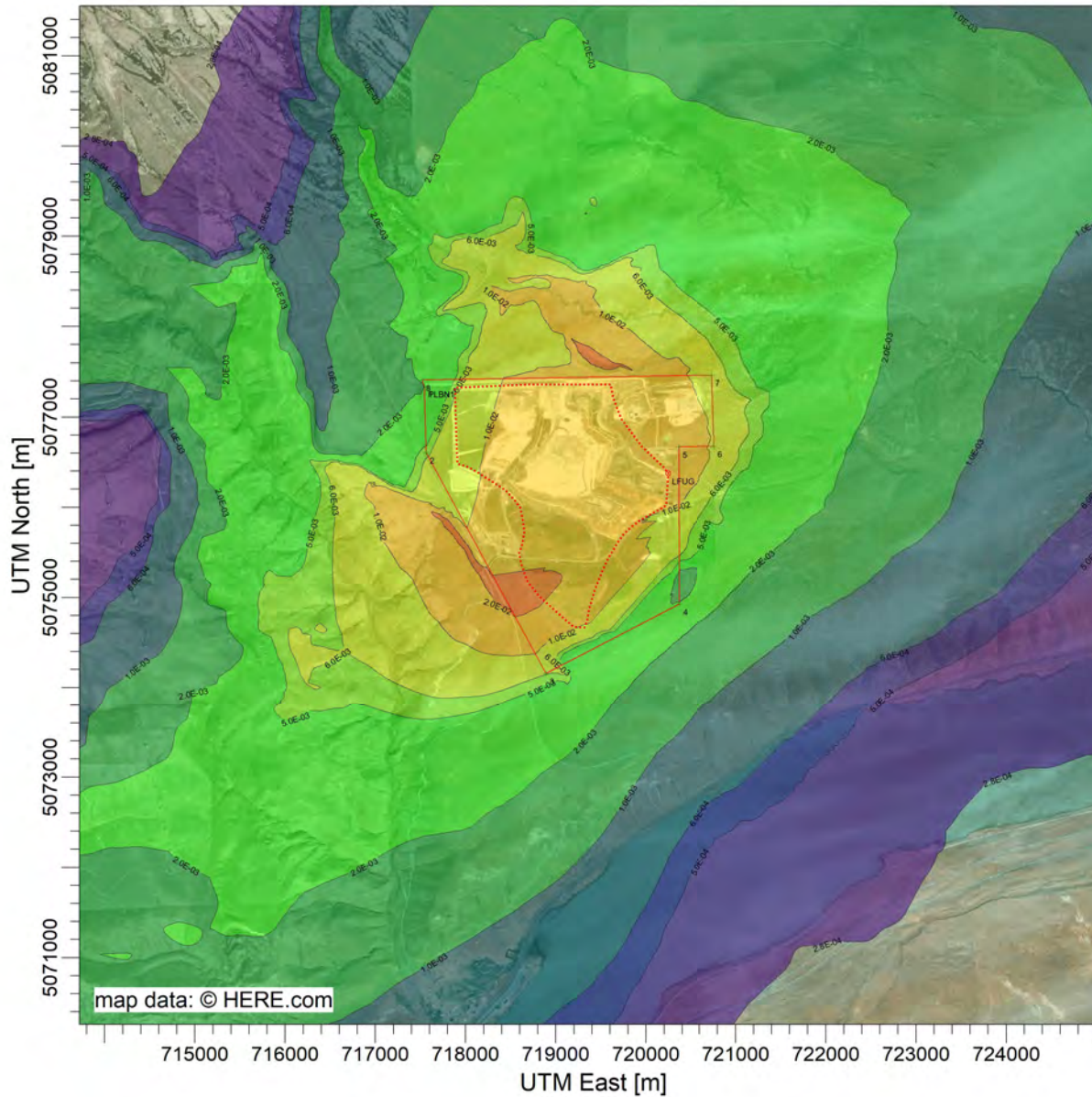
6/20/2023

SCALE:

1:76,872



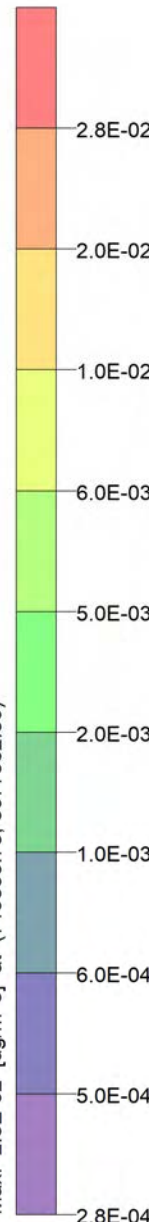
PROJECT NO.:



ug/m³

PLOT FILE OF ANNUAL VALUES AVERAGED ACROSS 1 YEARS FOR SOURCE GROUP: ALL

Max: 2.8E-02 [ug/m³] at (719536.75, 5077562.50)



Results Summary

Roosevelt 2023 Mod

127184 - Concentration - Source Group: ALL

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
ANNUAL		0.00884	ug/m^3	719536.75	5077562.50	466.56	0.00	534.00	

PROJECT TITLE:

**Annual Results for Perchloroethylene (127-18-4)
Roosevelt Regional Landfill**

COMMENTS:

SOURCES:

1

RECEPTORS:

135105

OUTPUT TYPE:

Concentration

MAX:

8.8E-03 ug/m³

COMPANY NAME:

WCG

MODELER:

M. Moore

DATE:

6/20/2023

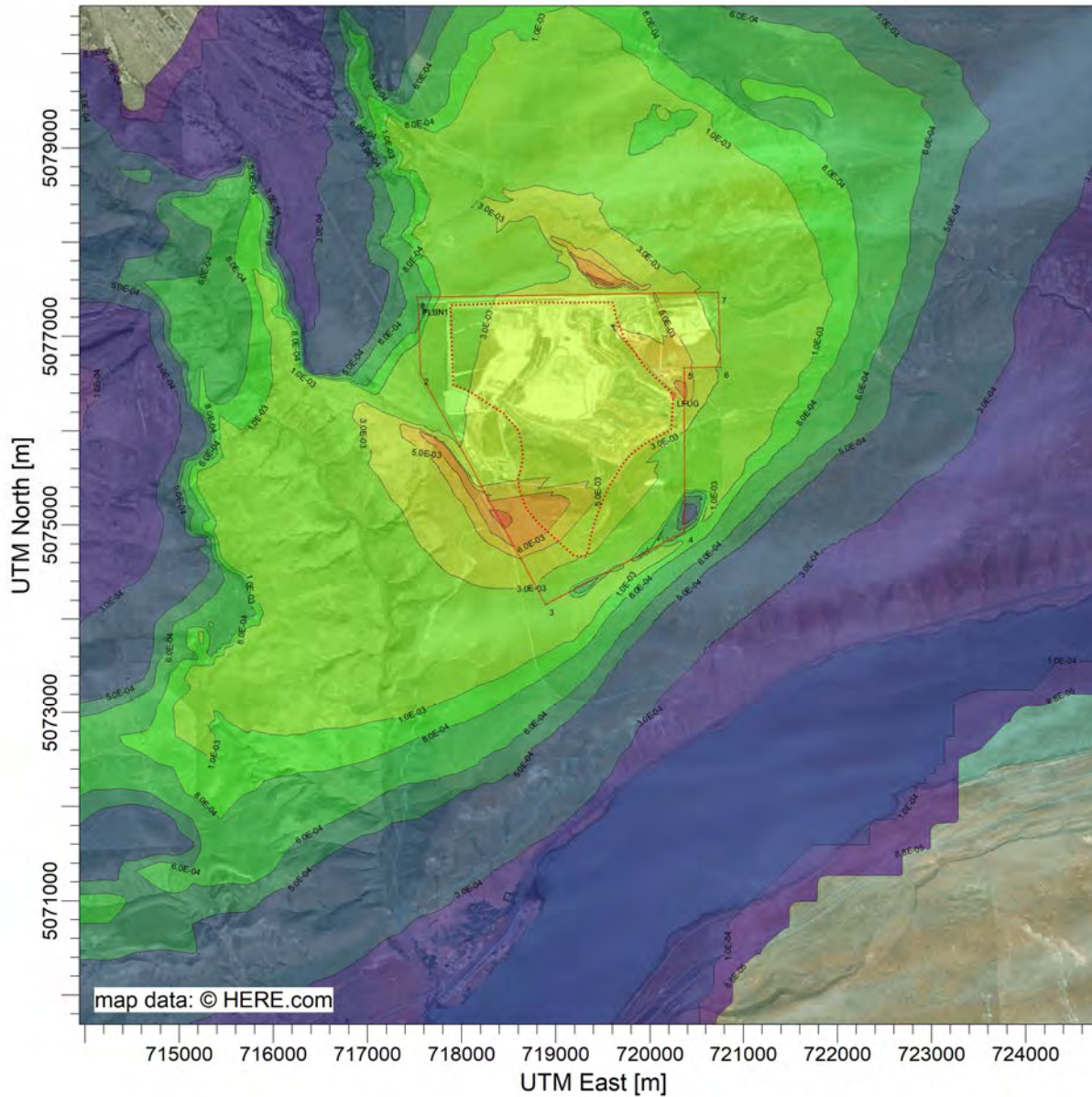
SCALE:

1:73,671

0

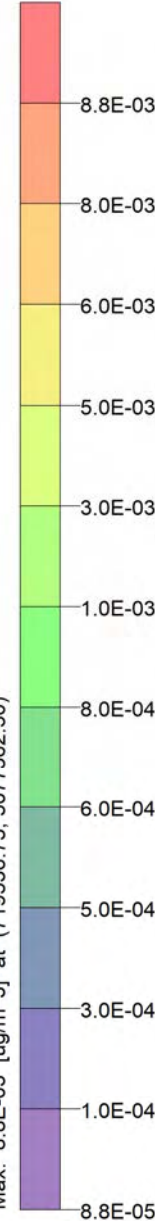
2 km

PROJECT NO.:



ug/m³

PLOT FILE OF ANNUAL VALUES AVERAGED ACROSS 1 YEARS FOR SOURCE GROUP: ALL
Max: 8.8E-03 [ug/m³] at (719536.75, 5077562.50)



Control Pathway

AERMOD

Dispersion Options

Titles Roosevelt 2023 Mod	
Dispersion Options <input checked="" type="checkbox"/> Regulatory Default <input type="checkbox"/> Non-Default Options	Dispersion Coefficient Rural
	Output Type <input checked="" type="checkbox"/> Concentration <input type="checkbox"/> Total Deposition (Dry & Wet) <input type="checkbox"/> Dry Deposition <input type="checkbox"/> Wet Deposition
	Plume Depletion <input type="checkbox"/> Dry Removal <input type="checkbox"/> Wet Removal
	Output Warnings <input type="checkbox"/> No Output Warnings <input type="checkbox"/> Non-fatal Warnings for Non-sequential Met Data

Pollutant / Averaging Time / Terrain Options

Pollutant Type OTHER - H2S	Exponential Decay Option not available
Averaging Time Options Hours <input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 6 <input type="checkbox"/> 8 <input type="checkbox"/> 12 <input checked="" type="checkbox"/> 24 <input type="checkbox"/> Month <input type="checkbox"/> Period <input type="checkbox"/> Annual	Terrain Height Options <input type="checkbox"/> Flat <input checked="" type="checkbox"/> Elevated SO: Meters RE: Meters TG: Meters
Flagpole Receptors <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Default Height = 0.00 m	

Source Pathway

AERMOD

Building Downwash Information

Option not in use

Emission Rate Units for Output

For Concentration

Unit Factor:	1 E6
Emission Unit Label:	GRAMS/SEC
Concentration Unit Label:	MICROGRAMS/M**3

Receptor Pathway

AERMOD

Receptor Networks

Note: Terrain Elevations and Flagpole Heights for Network Grids are in Page RE2 - 1 (if applicable)
Generated Discrete Receptors for Multi-Tier (Risk) Grid and Receptor Locations for Fenceline Grid are in Page RE3 - 1 (if applicable)

Discrete Receptors

Plant Boundary Receptors

Cartesian Plant Boundary

Primary

Record Number	X-Coordinate [m]	Y-Coordinate [m]	Group Name (Optional)	Terrain Elevation	Flagpole Height [m] (Optional)
1	717539.44	5077342.26	FENCEPRI	548.31	
2	717559.43	5076609.48	FENCEPRI	523.20	
3	718889.09	5074156.92	FENCEPRI	439.60	
4	720368.89	5074927.79	FENCEPRI	483.84	
5	720361.95	5076671.06	FENCEPRI	467.19	
6	720759.02	5076680.05	FENCEPRI	448.30	
7	720732.82	5077468.11	FENCEPRI	421.06	
8	717518.84	5077413.16	FENCEPRI	538.22	

Multi-Tier Grid (Risk)

Grid Settings

Grid Origin:	719236.74	5076149.85
Number of Tiered Segments:	6	

Segment Number	Distance from Center (Origin) [m]	Spacing [m]
1	2150.00	12.50
2	2400.00	25.00
3	2900.00	50.00
4	4000.00	100.00
5	6500.00	300.00
6	7000.00	600.00

Receptor Groups

Record Number	Group ID	Group Description
1	FENCEPRI	Cartesian plant boundary Primary Receptors
2	FENCEGRD	Receptors generated from Fenceline Grid
3	RISK	Receptors generated from Risk Grid

Meteorology Pathway

AERMOD

Met Input Data

Surface Met Data	
Filename:	..\\..\\Roosevelt\\roosevelt2.SFC
Format Type:	Default AERMET format

Profile Met Data	
Filename:	..\\..\\Roosevelt\\roosevelt2.PFL
Format Type:	Default AERMET format

Wind Speed	Wind Direction
<input type="checkbox"/> Wind Speeds are Vector Mean (Not Scalar Means)	Rotation Adjustment [deg]:

Potential Temperature Profile	
Base Elevation above MSL (for Primary Met Tower):	2,358.00 [m]

Meteorological Station Data

Stations	Station No.	Year	X Coordinate [m]	Y Coordinate [m]	Station Name
Surface		1992			SPOKANE/INT'L ARPT
Upper Air		1992			SPOKANE/INT'L ARPT

Data Period

Data Period to Process					
Start Date:	1/1/1992	Start Hour:	1	End Date:	12/31/1992
				End Hour:	24











Wind Speed Categories

Stability Category	Wind Speed [m/s]	Stability Category	Wind Speed [m/s]
A	1.54	D	8.23
B	3.09	E	10.8
C	5.14	F	No Upper Bound

Output Pathway

AERMOD

Tabular Printed Outputs

Short Term Averaging Period	RECTABLE Highest Values Table										MAXTABLE Maximum Values Table	DAYTABLE Daily Values Table
	1st	2nd	3rd	4th	5th	6th	7th	8th	9th	10th		
24												No

Contour Plot Files (PLOTFILE)

Path for PLOTFILES: H2S.AD

Averaging Period	Source Group ID	High Value	File Name
24	ALL	1st	24H1GALL.PLT

Results Summary

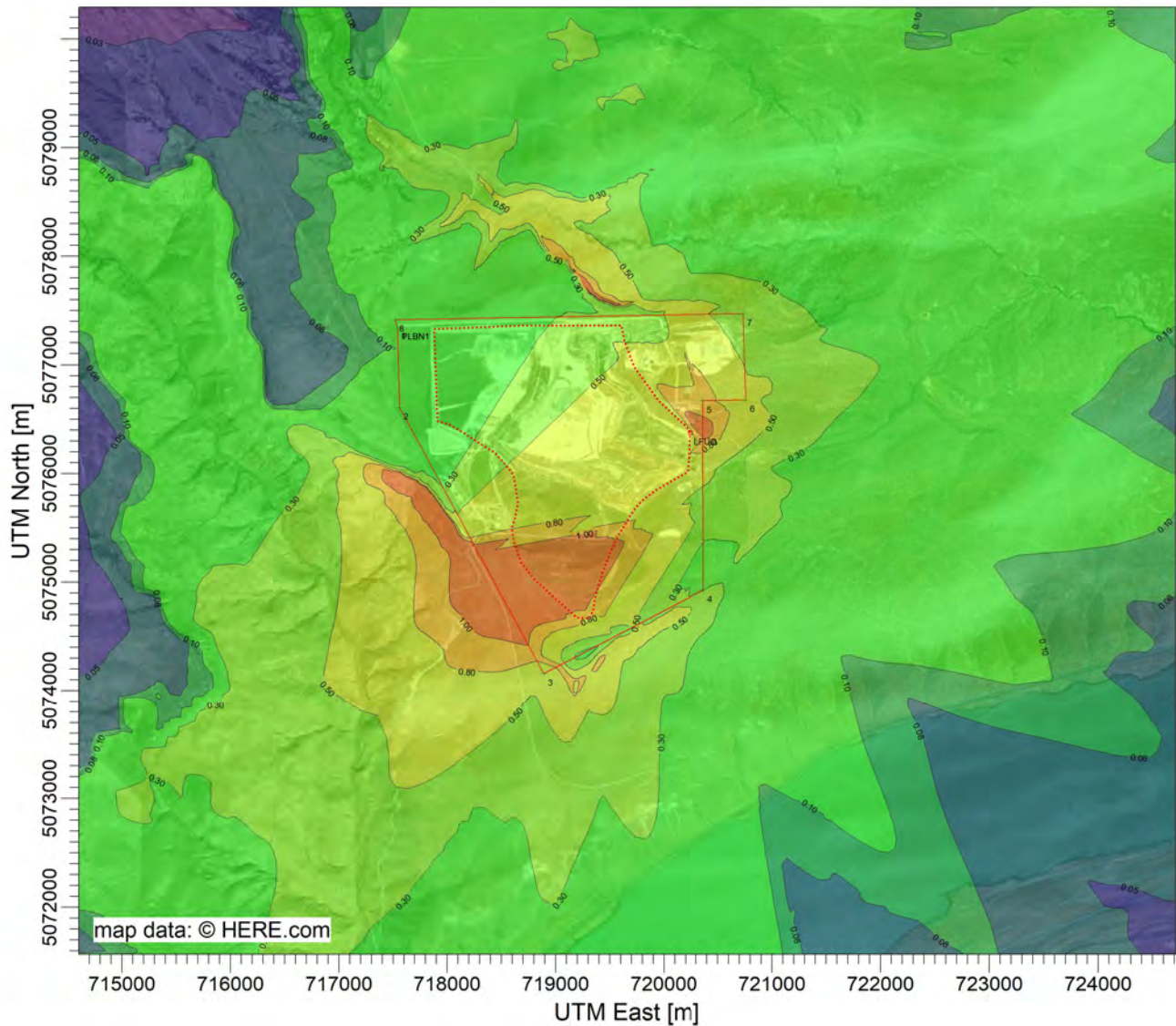
Roosevelt 2023 Mod

H2S - Concentration - Source Group: ALL

Averaging Period	Rank	Peak	Units	X (m)	Y (m)	ZELEV (m)	ZFLAG (m)	ZHILL (m)	Peak Date, Start Hour
24-HR	1ST	1.97540	ug/m ³	718424.25	5075012.50	464.75	0.00	501.00	1/18/1992, 24

PROJECT TITLE:

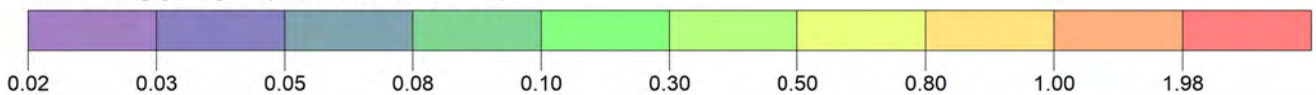
**24-HR Results for Hydrogen Sulfide (7783-06-4)
Roosevelt Regional Landfill**




PLOT FILE OF HIGH 1ST HIGH 24-HR VALUES FOR SOURCE GROUP: ALL

ug/m³

Max: 1.98 [ug/m³] at (718424.25, 5075012.50)



COMMENTS:	SOURCES: 1	COMPANY NAME: WCG
	RECEPTORS: 135105	MODELER: M. Moore
	OUTPUT TYPE: Concentration	SCALE: 1:63,555 0  2 km
	MAX: 1.98 ug/m³	DATE: 6/20/2023

APPENDIX G
SEPA ENVIRONMENTAL IMPACT STATEMENT

Roosevelt Regional Landfill Maximum Elevation Increase

Final Supplemental Environmental Impact Statement

Klickitat County Planning Department
Klickitat County Services Building
115 West Court Street # 302
Goldendale, Washington 98620

November 2022

Summary

A. Nature and Location of Proposal

Regional Disposal Company (RDC), owner and operator of the Roosevelt Regional Landfill in Klickitat County (Figure 1), proposes to increase the landfill's permitted maximum elevation from 1,820 MSL to 2,050 MSL.

The current landfill is permitted with an annual tonnage limit of 5 million tons per year, and permitted to operate through 2041.

The Proposed Action would continue the elements of the Klickitat County Solid Waste Project as currently permitted; however, the current conditional use permit language would be amended to revise Condition 7.6 to read “The maximum elevation of the landfill shall not exceed 2,050 MSL.” This change would also be made to the Klickitat County Comprehensive Solid Waste Management Plan.

The proposed increase in maximum elevation would not result in any increase in the annual tonnage nor the landfill footprint. The proposed increase in maximum elevation would increase the disposal capacity of the landfill from the existing permitted capacity of 245 million cubic yards (218 million tons) to approximately 360 million cubic yards (324 million tons). The resulting operational life of the landfill site would be extended from the year 2041 to an estimated year of 2130. No significant improvements would be required at the Roosevelt intermodal yard, and no change in permitted hours of operation are proposed. Modifications to the stormwater drainage plan would be made to accommodate the revised maximum elevation and corresponding landfill waste grading plan.

This Supplemental EIS (SEIS) evaluates the Proposal and the No Action Alternative in detail. In addition, the SEIS considers an alternative that would achieve the proposed annual tonnage and waste disposal capacity but would expand the landfill footprint; and an alternative that would further increase the annual tonnage and waste disposal capacity. The SEIS discusses the reasons for eliminating these alternatives from detailed study.

B. Proponent and Date of Implementation

Regional Disposal Company (RDC) is the project proponent. Upon receipt of the necessary permits (and approvals), RDC would complete the final design and begin to implement the approved changes.

C. Lead Agency, Responsible Official, and Contact Persons

The Klickitat County Planning Department is the SEPA lead agency. The SEPA responsible official and contact person for the SEIS is as follows:

Mo-chi Lindblad, Planning Director
Klickitat County Planning Department
Klickitat County Services Building

115 West Court Street, #302
 Goldendale, WA 98620
 Phone: (509) 773-5703
 Fax: (509) 773-6206
 Email: mo-chil@klickitatcounty.org

The contact for amending the Klickitat County Solid Waste Management Plan is:

Klickitat County Solid Waste Department
 115 West Court St., Room 204
 Goldendale, WA 98620
 Phone: (509) 773-4448
 Email: klickitatcountysolidwaste@klickitatcounty.org

D. Permits and Approvals Required

The following permits and approvals may have to be issued, revised, or amended to implement the Proposal:

Permit/Approval	Issuing Agency
Conditional Use permit #CUP2006-01	Klickitat County Planning
Solid Waste Handling Permit #20-0001	Klickitat County Department of Public Health
Special Incinerator Ash Permit	Washington State Department of Ecology
Air Operating Permit No. 14AQ-C182	Washington State Department of Ecology
Air Quality Permits <ul style="list-style-type: none"> • Air Quality Permit, NOC DE90-C153 (MSW Landfill) • Air Quality Permit, NOC DE98AQ-C131 (LFG Flare) • Air Quality Permit, NOC 08AQ-C087 (LFG Flare) 	Washington State Department of Ecology
National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge Baseline General Permit for Stormwater Discharges Associated with Industrial Activities Landfill: WAR000939E and Intermodal: WAR008953	Washington State Department of Ecology

E. Authors and Principal Contributors

Kathy Kinsland, Geo-Logic Associates	Primary Author
Aaron Ogorzalek, Geo-Logic Associates	Project Manager, Design engineer, AutoCAD graphics, Visual impact graphics

F. Previous and Subsequent Environmental Review

This SEIS supplements five previous EISs: the EIS on the *1990 Klickitat County Solid Waste Management Plan Update*; the SEIS on the *1992 Addendum to the 1990 Klickitat County Solid Waste Management Plan Update*; the 1989 EIS on the Klickitat County Solid Waste Project; and the 1992 SEIS on the Roosevelt Regional Landfill Modification and Expansion, and the 2002 Addendum to the Final Supplemental EIS. These documents are available for review at the Klickitat County Planning Department (see address in Section C above).

No subsequent environmental review of the proposed project is anticipated. If additional jurisdictions decide to use the Roosevelt Regional Landfill, appropriate environmental review would be conducted to evaluate the impacts of transportation routes or facilities not covered in this SEIS or previous EISs.

G. Location of Background Data

Background data for this SEIS are contained primarily in the technical appendices in Volume 2 of the 1992 SEIS; the previous EISs listed in Section F above; the Operations Plan and Engineering Report for the landfill; existing landfill permits; and landfill records, including results of monitoring programs. Other documents that provide background data are the *2021 Final Klickitat County Solid Waste Management Plan for Years 2021-2026*; the *1977 Klickitat County Comprehensive Plan*, as amended in 1979; the *1990 Roosevelt Community Subarea Plan*, as updated in 1995; and *Klickitat County Zoning Ordinance No. 62678*, enacted in 1979. These documents are available for review at the Klickitat County Planning Department (see address in Section C above).

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- Appendix A.2 Pipe Strength Calculations
- Appendix A.3 Aerial and Viewsheds for the No Action and Proposed Action Alternatives

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Abbreviations

ASIL	acceptable source impact level
BACT	best available control technology
BMP	best management practice
CFR	Code of Federal Regulations
CUP	conditional use permit
cy	cubic yard
dba	A-weighted decibel
Ecology	Washington Department of Ecology
EDNA	Environmental Designation for Noise Abatement
EIS	environmental impact statement
EPA	U.S. Environmental Protection Agency
FHWA	Federal Highway Administration
FSEIS	Final Supplemental Environmental Impact Statement
GCL	geosynthetic clay liner
lb/cy	pounds per cubic yard
mcy	million cubic yards
MSL	mean sea level
MSW	municipal solid waste
O ₃	ozone
OR	Oregon
Pb	lead
PM ₁₀	Particulate matter less than or equal to 10 microns in diameter (a micron is one millionth of a meter)
ppm	parts per million
PSD	Prevention of Significant Deterioration
PUD	Public Utility District
R	Residential zoning designation
RACT	reasonably available control technology
RC	Rural Center zoning designation
RDC	Regional Disposal Company
RR ₂	Rural Residential zoning designation, with a minimum lot size of 2 acres
scfm	standard cubic feet per minute
SEIS	supplemental environmental impact statement
SEPA	State Environmental Policy Act
S02	State Historic Preservation Officer
SR	State Route
WA	Washington

Section 1

Background, Objectives, and Alternatives,
Including the Proposed Action

Section 1. Background, Objectives, and Alternatives, Including the Proposed Action

1.1 Background

1.1.1 Location

Regional Disposal Company (RDC) owns and operates the Roosevelt Regional Landfill in Klickitat County. The municipal landfill is located on a 2,129-acre site in southeast Klickitat County, approximately 3 miles northeast of the community of Roosevelt and 5 miles via Roosevelt Grade Road (East Road) (Figure 2). The currently permitted landfill footprint occupies 915 acres of the site. The current landfill is permitted with an annual tonnage limit of 5 million tons per year (MTY), and permitted to operate through 2041.

1.1.2 Previous Environmental Review

This Supplemental EIS (SEIS) supplements five previous EISs:

- EIS on the *1990 Klickitat County Solid Waste Management Plan Update* (the 1990 Plan EIS);
- SEIS on the *1992 Addendum to the 1990 Klickitat County Solid Waste Management Plan Update* (the 1992 Plan SEIS);
- 1989 Final EIS on the Klickitat County Solid Waste Project (the 1989 Project EIS);
- 1992 SEIS on the Roosevelt Regional Landfill Modification and Expansion (the 1992 Project SEIS);
- 2002 Final Supplemental EIS on Roosevelt Regional Landfill Volume Expansion.

These documents are available for review at the Klickitat County Planning Department (see Section C of the Summary for address).

1.2 Proposed Action

The Proposed Action would continue the elements of the Klickitat County Solid Waste Project as currently permitted; however, the current conditional use permit language would be amended to revise Condition 7.6 to read “The maximum elevation of the landfill shall not exceed 2,050 MSL.” This change would also be made to the Klickitat County Comprehensive Solid Waste Management Plan.

The proposed increase in elevation would not result in any increase in the annual tonnage nor landfill footprint. The proposed increase in maximum elevation would increase the disposal capacity of the landfill from the existing permitted capacity of 245 million cubic yards (218 million tons) to approximately 360 million cubic yards (324 million tons). The resulting operational life of the landfill site would be extended from the year 2041 to an estimated year of 2130. No significant improvements would be required at the Roosevelt intermodal yard, and no change in permitted

hours of operation are proposed. Modifications to the stormwater drainage plan would be made to accommodate the revised maximum elevation and corresponding landfill waste grading plan.

1.3 Objectives and Need

The primary objective of the proposal is to assure Klickitat County and other existing RDC customers of secure long-term disposal and to increase the waste disposal capacity at the landfill without increasing the currently permitted footprint.

1.4 Description of Alternatives

1.4.1 Alternatives Evaluated in this SEIS

In addition to the Proposed Action/Proposal, this SEIS evaluates the No Action Alternative, which represents continued operation of the landfill under limitations imposed through existing permits. No changes beyond what has already been approved would be implemented. The existing maximum elevation limitation would remain at 1,820 MSL.

The analysis of the No Action Alternative provides the baseline for analyzing the impacts of the Proposed Action. Table 1 shows the key characteristics of the No Action Alternative and the Proposed Action.

The objective of the Proposed Action is to maximize the volume of the permitted footprint area while taking into consideration engineering restrictions that include 1) slope stability, 2) pipe strength of existing and future leachate collection pipes at the bottom of the landfill, and 3) maintaining the minimum required top deck slope of 5% for stormwater drainage. Different profiles were evaluated and the profile that met the project objectives was selected as the Proposed Action. No other alternatives were considered beyond the Proposed Action and the No Action Alternative.

1.4.2 Issues Not Analyzed In this SEIS

Several potential issue areas are not evaluated in this SEIS because there would be no potential to affect these resources given there is no proposed horizontal expansion of the permitted landfill footprint, increase in maximum annual waste tonnage rate, increase in traffic generation, nor modification to any landfill operation (such as the Intermodal facility). The issues not carried forward in the environmental evaluation include the following:

- ***Cultural Resources***

- Cultural resources would continue to be managed in accordance with the existing Memorandum of Understanding (MOU) among the Washington State Department of Archeological and Historic Preservation, Klickitat County, and Regional Disposal Company.

- ***Transportation***

- The Proposed Action would not require development or use of any new haul roads or improvements to any onsite or offsite roadways. No change to solid waste delivery to the intermodal yard is proposed. No new employees are needed as a result of the

landfill maximum elevation increase; thus, no new traffic generation would occur as a result of the Proposed Action.

- **Public Services**

- Under both the No Action Alternative and the Proposal, public schools in the Roosevelt and Bickleton school districts would not be affected by either alternative. No change in the number of employees would be needed under either alternative.
- There would be adequate emergency medical response to the landfill under either alternative. The Roosevelt Fire Department maintains an emergency aid truck in Roosevelt; ambulance service is available from Goldendale, approximately 48 miles east of the landfill; and RDC maintains an emergency response team at the landfill that is trained and equipped to handle personal injury accidents. Like current employees, new employees would be trained in first aid, cardio-pulmonary resuscitation, and health and safety.

Table 1- Key Characteristics of the No Action Alternative and the Proposed Action at Final Grade

Element	No Action Alternative (Currently Permitted)	Proposed
Landfill Property	2,129 acres	No change
Operational End Date	2041	2130 ¹
Maximum Elevation	1,820 MSL	2,050 MSL
Maximum Slope	3H:1V	No change
Landfill Footprint	915 acres	No change
Total Landfill Capacity ²	218 MT	324 MT
Total Landfill Capacity ³	245 MCY	360 MCY
Average Waste Depth	170 feet	300 feet
Maximum Waste Depth	320 feet	350 feet
Soil Remaining to be Excavated	27 MCY	27 MCY
Total Soil Required	34 MCY	51 MCY
Operational Hours	No change	No change
Storm Drainage System	No change	Modified to accommodate new profile/drainage areas
Expanded Work Force (employees)	No change	No change
Landfill Equipment	No change	No change

¹ Operational end date is estimated based on existing waste tonnage and density. Actual operational end date may vary based on tonnage and densities achieved, up to the maximum permitted tonnage of 5 MTY.

² Assumes 1800 lb (0.9 ton) waste per cubic yard of available airspace, in million tons (MT).

³ Available airspace for disposal of waste in million cubic yards (MCY).

1.4.3 Environmental Controls

The No Action Alternative would continue to implement the existing environmental controls required by federal, state, and local regulations. Currently planned environmental controls include

the following:

- A program for detecting and preventing the disposal of dangerous waste.
- A bottom liner system to prevent contact with groundwater and offsite migration of leachate.
- A leachate management system. Leachate is contaminated water generated from precipitation falling on open areas and infiltrating into the waste. Leachate is collected in pipes installed in the drainage aggregate on top of the bottom liner, and flows by gravity to a leachate collection pond. From there, it is pumped to other ponds and reintroduced into the landfill. Leachate reintroduction results in earlier decomposition and stabilization of organic waste in the landfill.
- Use of *daily cover* over each day's compacted waste to control disease vectors, fires, odor, and blowing litter; *interim cover* over areas that have received waste but will be inactive for some time; and *final cover* over the entire landfill to minimize erosion and infiltration of rainwater once the landfill reaches final grades. Cover materials comply with applicable regulations.
- A stormwater management system that prevents stormwater run-on from flowing into the active area, and collects and controls stormwater runoff from a wide range of storm events.
- Runoff from areas with interim cover are managed as stormwater, while runoff from areas without interim cover are managed as leachate.
- Best management practices (BMPs) to minimize erosion and sedimentation, including hydroseeding exposed inactive excavations, stockpiles, and covered refuse slopes; controlling peak runoff rates; and trapping sediment in onsite detention/sedimentation basins.
- Dust control, including paving onsite haul roads to within 100 feet of the bottom liner, spraying water as needed, wheel-washing, and control of dust from rock crushing, as specified in the air operating permit.
- Landfill gas control. Landfill gas would continue to be actively collected and either burned in high-temperature flares or directed to Klickitat County PUD No. 1 and used as a beneficial resource.
- Pest and disease vector control. RDC implements measures to control agricultural pests, as well as potential disease vectors such as rodents, flies, mosquitoes, and gulls.
- Vegetated buffers at least 250-feet wide between the landfill footprint and the site boundary.
- Monitoring programs for groundwater, leachate, landfill gas, and particulate matter (dust); and two annual surface water inspections (one wet weather and one dry weather).
- A program of routine inspection and maintenance to ensure that landfill equipment and

environmental controls remain in working order. This includes regular inspection and maintenance of solid waste containers to ensure they are kept clean and leak resistant.

- Contingency plans to deal with emergencies and other occurrences that require immediate attention, such as fire and explosion, leachate seeps on the side slopes of the landfill, surface water or groundwater contamination observed in monitoring programs, severe storms, leachate spills, and discovery of historic or cultural resources.

Under the Proposed Action, these environmental control systems and procedures would continue to be used. Modifications to the stormwater management plan would be needed to accommodate the new waste grading plan and landfill drainage areas, and minor modifications to other environmental controls would be needed to accommodate the new landfill profile.

1.4.4 Development of Disposal Areas

General Construction Practices

Under either alternative, the landfill would be developed through phased construction of lined permitted disposal areas. Cell construction (subgrade preparation, bottom liner installation, and placement of drainage layer and leachate collection pipes) usually takes a complete construction season and is performed in phases averaging approximately 20 acres every 1-2 years. Geosynthetic clay liner (GCL) was a previously approved alternative to the 2-foot compacted clay liner starting with Area 11 and has continued to be used in subsequent landfill expansions ever since. The most recent phase of cell construction was Area 22 in 2021. Under the either alternative, waste filling would occur in waste disposal areas from new construction phases and on top of previously permitted constructed disposal areas. Final cover and revegetation would be implemented over 40-60 acres at a time when that much area has been filled to capacity and sufficient time has elapsed to allow settlement to occur. No additional disposal areas outside of the currently permitted area would be required under the Proposed Action since the disposal would occur over currently permitted footprint. All other construction practices would remain unchanged by the Proposed Action, as described in the 2002 Final Supplemental EIS on Roosevelt Regional Landfill Volume Expansion.

Availability of Soils

Approximately 27.4 million cubic yards of soil material remains to be excavated from the landfill footprint under the currently approved landfill operational permit. An additional estimated 8.2 million cubic yards of soil materials are available in on-site stockpiles and borrow areas owned by the landfill. RDC would continue to use currently permitted borrow sites and will import additional materials as needed to satisfy site soil requirements.

No excavation or stockpiling would occur within the 250-foot buffer zones, on the south-facing side of the ridge near the southern boundary of the site, nor in the east half of the east half of Section 27. Avoidance of these areas would protect two potentially significant cultural resource sites identified in cultural resource surveys in 1989 and 1992 (see Section 2.8 of the 2002 Final Supplemental EIS on Roosevelt Regional Landfill Volume Expansion). As soon as needed soil materials were removed, borrow areas would be reclaimed in accordance with a reclamation plan approved by Klickitat County or the Washington Department of Natural Resources, depending on the size of the area. Areas where soil stockpiling has occurred would be graded and vegetated to resemble natural conditions. Further detail on the issue of soils availability is provided in Section 2.1, Earth.

Section 2

Affected Environment, Impacts, and
Mitigation Measures

Section 2. Affected Environment, Impacts, and Mitigation Measures

2.1 Earth

2.1.1 Affected Environment

The topography and geology of the landfill are described in detail in the 1989 Project EIS and 1992 Project SEIS. This section provides a brief synopsis of that information, updated to reflect the current level of site development, and effects as a result of the Proposed Action.

Topography

The landfill site lies on the rim of a large shallow topographic depression, or bowl-shaped area, that slopes gradually to the east and southeast. Site elevations range from nearly 1,800 feet in the northwest corner of the site to 1,450 feet on the east side of the site (see Figure 3). The original ground slopes in the area proposed for landfill development range from 3 to 30%, with an average across the site of approximately 4%.

Approximately 405 acres of the proposed 915-acre footprint have been developed into landfill disposal areas (see Figure 3). RDC has constructed an average of one new disposal area per year with an average size of 20 acres. Current elevations in the developed area range from approximately 1,460 to 1,790 feet MSL. Disposal areas have been filled with waste to a maximum depth of approximately 233 feet, with side slopes generally ranging from 4H:1V to 5H:1V and a maximum slope of 3H:1V in a few isolated areas.

Geology and Soils

The site geology consists of alternating layers of volcanic flows (basalt) and sedimentary deposits typical of the geologic structure encountered east of the Cascades (Klickitat County 1992). The following paragraphs provide a general description of the soil and rock layers found on site, from the top layer down.

- **Loess.** Much of the undeveloped portion of the site is overlain by a layer of windblown silt and ash called loess. The thickness of this layer ranges from 0 to 8 feet. Where development has occurred, this material has been stripped and stockpiled for future use in final cover.
- **Elephant Mountain Basalt.** This layer is known locally as the “cap rock.” Because the site was near the margin of the volcanic flow, Elephant Mountain Basalt only occurs over parts of the site, at a maximum thickness of only 17 feet. This material has historically been used at the site to generate rock needed for constructing haul roads, drainage layers, and other uses. The material is generally excavated by ripping, but occasional blasting is required.
- **Rattlesnake Ridge Sediments.** This is the predominant soil unit across the site, ranging in thickness from 50-88 feet. It consists of interbedded sandstone, siltstone, and claystone, as well as localized deposits of gravel. The lowest zone of this layer has historically been mined for claystone to construct clay liners. The overburden material above the claystone has been used for landfill operations (daily and intermediate cover) or road building, or has been stockpiled for future use.
- **Pomona Basalt.** This layer derives from a single volcanic flow, and ranges from 113-131 feet thick. The bottom of the existing MSW landfill has been excavated to approximately the top of this layer.

- **Selah Member Sediments.** Underlying the entire site, this is a low-permeability sedimentary layer that at one point on the site was verified to be 341 feet thick. As discussed in Section 2.2, this layer greatly restricts the movement of groundwater from saturated fractures in the Pomona Basalt to underlying deep aquifers.

2.1.2 Impacts

No Action Alternative:

Topography

Figure 4 shows the final grading plan for the No-Action Alternative. Topographic changes to the site would occur gradually throughout the life of the landfill. New lined disposal areas approximately 10-35 acres in size would be constructed every year or every other year over the next 20 years. At final grade, the landfill would have a maximum elevation of approximately 1,820 feet MSL with maximum side slopes of 3H:1V and maximum waste thickness of 320 feet. No change to earth resources, elevation or slopes would occur beyond what is currently permitted.

Soils

The primary soil types used in the landfill development would continue to be rock (primarily Elephant Mountain Basalt), and soil (loess and the upper layers of the Rattlesnake Ridge sediments). Rock would be used to construct drainage layers as part of the liner or cover systems, and for haul roads and tipping decks on and outside of the landfill footprint. Other soils would be used for construction of berms, daily and intermediate cover in the landfill, and for final cover. Clay is no longer used as bottom liner at the site, as GCL has been an approved alternative low-permeability soil layer since Area 11. Any clay that is encountered in future excavations may be used for berms, daily and intermediate cover in the landfill, and for final cover.

Soil requirements of the No Action Alternative are summarized in Table 2 and estimated to be approximately 33.5 million cubic yards (MCY). No change to soil or rock resources would occur beyond what is currently permitted.

Table 2- Estimated Soil Needs Over Site Life

Element	No Action Alternative (Currently Permitted) (CY)	Proposed Action (CY)
Soil Required for Cell Construction	2,209,100	2,209,100
Soil Required for Capping Construction	4,480,700	4,548,800
Soil Required for Daily Operations	26,843,500	44,543,500
Total Soil Needs	33,533,300	51,301,400

Proposed Action Alternative:

Topography

Figure 5 shows the final grading plan for the Proposed Action. The bottom grading plan would be the same as that for the No Action Alternative (see Figure 6). Like the No Action Alternative, topographic changes to the site would occur gradually throughout the life of the landfill. New lined disposal areas approximately 10-35 acres in size would be constructed every year or every other year over the next 109 years. Subsequent filling would occur on top of previously constructed disposal areas. At final grade, the landfill would have a maximum elevation of approximately 2,050 feet MSL with maximum side slopes of 3H:1V and maximum waste thickness of 350 feet.

Figures 7 and 8 compare several cross sections of the No Action Alternative and the Proposed Action Alternative. The maximum waste thickness of the Proposed Action exceeds the maximum depth assumed in the previous leachate collection pipe strength calculations (Thiel Engineering, 2001). Therefore, supplemental calculations for pipe strength of the Proposed Action are included in Appendix A. The supplemental pipe strength calculations suggest that the additional waste thickness associated with the Proposed Action would have a negligible impact on the strength and durability of the leachate collection pipes. Updated slope stability analyses associated with the revised final grades of the Proposed Action show that the proposed slopes meet State requirements for slope stability of landfills. The slope stability analysis is provided in Appendix A.

Soils

Soil requirements of the Proposed Action are summarized in Table 2 and estimated to be approximately 51.3 MCY. Rock and soil would continue to be used in the same manner as the No Action Alternative. Soil and rock requirements for cell construction and capping would remain relatively the same (capping soil requirements would increase slightly, see Table 2). However, since the duration of landfilling operations under the Proposed Action would be longer than under the No Action Alternative, the Proposed Action would utilize more soil and rock for daily operations. Based on the available soil and rock estimates described in Section 1.4.4, it is estimated that approximately 2.1 MCY of soil surplus exists under the No Action Alternative, and an approximate 15.6 MCY deficit exists under the Proposed Action. As described in Section 1.4.4, the site would continue to utilize excavation materials from the future landfill footprint and borrow sources on existing parcels and would import additional materials as needed to satisfy site soil requirements. Any new on-site borrow sources would undergo review and approval by the County.

2.1.3 Mitigation Measures

BMPs for erosion and sedimentation control are incorporated into both alternatives, as discussed in Section 1.4.3. These include regular inspection and maintenance of control measures. Borrow areas outside the landfill footprint would be reclaimed in accordance with a reclamation plan approved by Klickitat County or the Washington Department of Natural Resources, depending on the size of the area. Areas where soil stockpiling has occurred would be graded and vegetated to resemble natural conditions. Erosion and sediment control of final cover material at final grade would be minimized by constructing drainage terraces at approximately 150-foot spacing to accommodate storm water drainage, and seeding final cover slopes. Mitigation measures are expected to perform equally well for both alternatives.

2.1.4 Significant Unavoidable Adverse Impacts

With the mitigation measures incorporated into the project, no significant adverse impacts related to earth resources would be expected.

2.2 Surface Water

2.2.1 Affected Environment

The affected environment for surface and ground water are described in the 1989 Project EIS and 1992 Project SEIS. This section provides a brief synopsis of that information, updated to reflect the current level of site development.

Most of the 915-acre landfill footprint lies within the Coyote Creek drainage basin, with a small portion in the northwest corner draining to Wood Gulch Creek. Coyote Creek flows east to northeast for approximately 1.5 miles to Pine Creek, which flows southeast approximately 3 miles to the Columbia River. Wood Gulch Creek flows approximately 3 miles south to the Columbia River. All of the drainages that carry surface water through the site are intermittent. Most precipitation that creates surface water flow in these drainages occurs during the winter and spring.

Currently approximately 405 acres of the proposed 915-acre landfill footprint have been developed into lined waste disposal areas. Stormwater run-on from the west is diverted around the disposal areas by a run-on control ditch and berm. Stormwater runoff from active portions of the landfill without interim cover is prevented from entering the stormwater management system. This runoff is managed as leachate, and allowed to infiltrate into the waste or directed to a leachate pond. Stormwater that falls onto inactive areas of the landfill is managed as clean stormwater runoff. Inactive areas are covered with soil and graded to direct stormwater runoff to the toe of the waste fill, where it is conveyed in ditches to stormwater sedimentation/detention basins.

The stormwater management system at the landfill is designed to handle peak flows from a wide range of storm events, from the 2-year 24-hour storm to the 100-year, 24-hour storm. In addition, the system is designed handle the rapid snowmelt resulting from a Chinook wind, the equivalent of one inch of water in 24 hours. A variety of BMPs are currently implemented at the landfill to control erosion and sediment transport. These controls and described in more detail in Section 1.4.3.

The Stormwater Pollution Prevention Plan for the landfill (RDC 1998a), which is a requirement of the NPDES permit, specifies that RDC will conduct two annual stormwater inspections, one during wet weather and one during dry weather. Based on observations during these inspections, BMPs in use at the landfill have been effective in preventing landfill-related pollution of stormwater.

2.2.2 Impacts

No Action Alternative:

No change to the stormwater system or water management system would be required under the No Action Alternative beyond what has already been permitted.

Proposed Action Alternative:

Under the Proposed Action, the stormwater management system for the landfill would remain unchanged in the short-term. However, for long-term stormwater management, the maximum elevation increase would require modification to the landfill's stormwater management system plan to continue to meet BMPs and permit conditions. The change would include moving or extending stormwater interception drains, deploying additional drains or stormwater controls, and re-evaluating the location and size of stormwater detention ponds. A Stormwater Master Plan for the site would be developed addressing stormwater design and BMP's for future development phases of the landfill.

2.2.3 Mitigation Measures

A number of mitigation measures for potential impacts on surface water would be incorporated into the project under either alternative. These are discussed in detail in the 2002 Final Supplemental EIS on Roosevelt Regional Landfill Volume Expansion. Mitigation measures are expected to perform equally well for both alternatives.

2.2.4 Significant Unavoidable Adverse Impacts

With the mitigation measures incorporated into the project, no significant adverse impacts related to surface water would be expected.

2.3 Groundwater

2.3.1 Affected Environment

Groundwater conditions at the site are characterized in detail in the 1989 Project EIS, the 1992 Project SEIS, and the 2002 Project SEIS. Key characteristics are described below.

Groundwater Occurrence and Quality

The first aquifer beneath the site consists of saturated fractures within the Pomona Basalt approximately 50 to 200 feet below ground level (an aquifer is a water-saturated layer of high-permeability materials large enough to provide water to a well or spring). The aquifer occurs primarily in the more fractured bottom section of the basalt flow immediately above the Selah Member clays. The direction of flow is generally west to east. Flow depths range from zero in the western portion of the site to several tens of feet in the southeastern portion. The quality of groundwater in the Pomona aquifer beneath the site appears to have been affected by agricultural use, and does not meet federal and state secondary drinking water standards. Secondary drinking water standards are not for health purposes, but relate to aesthetic considerations such as taste, smell, and appearance.

The low-permeability layer of Selah Member clays and silts, estimated to be approximately 340-feet thick at the landfill site, is a major aquitard, greatly limiting the rate of groundwater flow from the Pomona aquifer to underlying deep aquifers. Regional aquifers lie beneath the site at depths of 1,000 feet or more. Travel time calculations indicate it would take approximately 1,500 years for groundwater to move through the Selah member clays and silts to the underlying deep aquifer, and another 100 years to reach water supply wells in Roosevelt.

Beneficial Use

Roosevelt is served by 5 water supply wells that tap the regional aquifer. Three other water supply wells are also located within a 20-mile radius of the site, as well as 14 springs, some of which are used for stock-watering. RDC uses groundwater from a water supply well in the western portion of the site (Figure 3) for a variety of uses, including domestic supply, dust control, fire protection, and continuous construction and maintenance of landfill facilities. The well taps the regional aquifer at a depth of approximately 1000 feet.

On an annual basis, the predominant use of groundwater at the site is for landfill operations, primarily dust control. The greatest monthly water use was historically during months when the clay liner was being constructed for a new disposal area. However, since GCL has replaced clay liner, and clay liner is no longer used at the site, water consumption for clay liner construction is now zero.

Environmental Controls

As discussed in detail in Section 1.4.3, a number of environmental controls are incorporated into the design and operation of the landfill for the purpose of minimizing potential impacts on groundwater quality. These measures, which are required by federal, state, and local regulations, include the bottom liner system, which is subject to a rigorous quality control program during construction; control systems for leachate, stormwater, and landfill gas; and monitoring programs for groundwater, surface water, leachate, and landfill gas.

2.3.2 Impacts

No Action Alternative:

No change to the groundwater quality, demand, nor environmental controls beyond the current usage and management under the No Action Alternative.

Proposed Action Alternative:

Under the Proposed Action, groundwater usage for operational practices and dust control as well as environmental controls and monitoring would be extended by an estimated 89 years. No other changes to the groundwater quality nor environmental controls are anticipated under the Proposed Action.

2.3.3 Mitigation Measures

A number of mitigation measures for potential impacts on groundwater would be incorporated into the project under either alternative. These are discussed in detail in the 2002 Final Supplemental EIS on Roosevelt Regional Landfill Volume Expansion. Mitigation measures are expected to perform equally well for both alternatives.

2.3.4 Significant Unavoidable Adverse Impacts

With the mitigation measures incorporated into the project, no significant adverse impacts related to groundwater would be expected.

2.4 Air Quality

2.4.1 Affected Environment

The Roosevelt Regional Landfill and landfill-related operations generate various types of air emissions, including: fugitive emissions of landfill gas, products of combustion and unburned contaminants from the burning of landfill gas in flares or energy-generating facilities, and fugitive dust and exhaust emissions from heavy equipment and trucks operating at the landfill and the intermodal yard.

2.4.2 Impacts

No Action Alternative:

Under the No Action Alternative, total landfill gas generation is predicted to peak at 38,800 scfm in the year 2042. In 2006, it was estimated that the landfill generated 4,000 scfm. This number is based on modeling performed in 2006 for the previous SEIS. In that study, the landfill gas generation would increase from 22,700 scfm in 2030 to 38,800 by 2042 (the currently permitted closure date). This represents an annual increase in total landfill gas of 1,342 scfm per year between 2030 and 2042. It is estimated that the landfill gas collection system would collect at least 90% of this gas and direct it to flares or energy-generating facilities for combustion, while the remaining 10% or less would escape through the landfill cover as fugitive landfill gas emissions. The number of flares required to burn all the collected gas depends on their capacity.

The maximum number of flares required for the existing landfill is six.

Technical air quality analyses performed in 2006 demonstrate that landfill emissions would not cause exceedances of any ambient air quality standards; will remain below PSD increments and Washington State health-based screening criteria for toxic air pollutants; and will meet U.S. Forest Service criteria designed to protect visibility, forest ecosystems, and aquatic ecosystems in national parks and wilderness areas (referred to as Class I areas).

Proposed Action Alternative:

Given the landfill maximum elevation modification associated with the Proposed Action would extend the landfill life to 2130, it is expected that the total landfill gas generation peak would also increase since the landfill would operate an additional 89 years. However, it is assumed the landfill gas collection system would continue to collect at least 90% of the gas as it would under the No Action Alternative, leaving 10% or less of the gas as fugitive landfill gas. Based on the modeling performed in 2006 for the SEIS, and assuming a similar annual increase in landfill gas per year (1,300 scfm), the predicted total landfill gas generation under the Proposed Action is estimated to be 152,000 scfm (a total increase of 113,200 scfm), by 2130.

No increase in mobile emissions is anticipated since there would be no increase in equipment usage under this alternative.

2.4.3 Mitigation Measures

A number of mitigation measures for potential impacts on air quality would be incorporated into the project under either alternative. Mitigation measures are expected to perform equally well for both alternatives. These are discussed in detail in the 2002 Final Supplemental EIS on Roosevelt Regional Landfill Volume Expansion, include:

- An active landfill gas collection system that would continue to collect at least 90% of the generated gas and direct it to the Klickitat County PUD energy-recovery facility or to high-temperature shielded flares, where it would be burned to destroy toxic constituents. As noted previously, the Roosevelt Regional Landfill would be expected to be at the upper end of feasible landfill gas collection efficiency, and may even exceed the 90% level assumed in air quality modeling. Not only does the landfill have a low permeability bottom liner, but the spacing of collection pipes in the landfill is conducive to a high level of collection efficiency. Most modern landfills place gas collection pipes in horizontal trenches that are 200 feet or more apart or vertical wells spaced 300 feet apart. The horizontal trenches at the Roosevelt Regional Landfill are approximately 140-160 feet apart and vertical wells 150-200 feet apart, increasing the amount of generated gas that is captured by the vacuum and directed to flares or to the PUD facility. The landfill gas collection system in future disposal areas would continue to be designed to achieve a high level of collection efficiency.
- Use of daily, interim, and final cover to minimize fresh garbage odors, and improve the efficiency of the gas collection system.
- Phased construction of lined disposal areas to minimize the amount of soil exposed at any one time, thereby minimizing wind erosion and fugitive dust.
- An aggressive dust control program, including paving roads used by solid waste hauling vehicles to within 100 feet of the bottom liner; wetting paved and unpaved roads, areas where construction or excavation is occurring, and exposed soil stockpiles, as needed to control dust;

erosion control best management practices; and control of fugitive dust emissions from rock crushing, in accordance with the air operating permit.

- Maintenance of 250-foot minimum buffers between the active landfill area and the site boundary.
- Routine inspection and maintenance of solid waste containers to minimize the potential for leakage and associated odor.
- Compliance with conditions of the air operating permit, including surface emissions monitoring for methane and implementation of any needed improvements in the gas collection system; testing of flare emissions; ambient air quality monitoring for PM10 and lead; and visible emissions surveys to monitor the effectiveness of dust control measures.
- Quickly stabilize exposed soils at the landfill site to reduce the potential for fugitive dust.

2.4.4 Significant Unavoidable Adverse Impacts

With the mitigation measures incorporated into the project, no significant adverse impacts related to air quality would be expected.

2.5 Noise

2.5.1 Affected Environment

In 2006 an update noise analysis was prepared (Geomatrix 2006) to model impacts related to expanding the hours of operation of the landfill intermodal facility to 24 hours and increased nighttime truck traffic on the landfill's haul road. The 2006 SEIS found that the predicted sound levels from proposed landfill changes in 2006 would be gradual over a number of year and likely not discernible.

2.5.2 Impacts

No Action Alternative:

Under the No Action Alternative, the landfill would continue to operate at it's currently permitted level and configuration, and noise from landfill activity would comply with the state noise limit at the nearest site boundary and the nearest residence.

Proposed Action:

Under the Proposed Action, no changes in operations of the landfill, especially near residence, is proposed, and the landfill would continue to operate at it's currently permitted level and configuration and in compliance with state noise limits. There is no anticipated change in the noise levels generated by the landfill with the maximum elevation increase under the Proposed Action.

2.5.3 Mitigation Measures

RDC would continue to supply all equipment and trucks with effective, well maintained mufflers and other sound control devices.

2.5.4 Significant Unavoidable Adverse Impacts

With the mitigation measures incorporated into the project, no significant adverse impacts related to noise would be expected.

2.6 Land Use and Plan Consistency

2.6.1 Affected Environment

The existing landfill is consistent with the *Klickitat County Comprehensive Plan*, the *Roosevelt Community Subarea Plan*, and *Zoning Ordinance No. 62678*, and the *2021 Klickitat County Solid Waste Management Plan Update*, as approved by the County, included an annual tonnage limit of 5 MTY.

As currently designed and approved, the landfill would be developed and closed in phases and revegetated. In 2006, the County extend the life of the landfill to the year 2041 and approved the additional of roughly an additional 104 employees.

2.6.2 Impacts

No Action Alternative:

Under the No Action Alternative, the landfill would continue to operate under current permit conditions and would operate until 2041.

Proposed Action Alternative:

No changes or alterations to the landfill, other than the height modification from a maximum elevation of 1,820 MSL to 2,050 MSL would occur. The landfill's total capacity would expand from 245 MCY to 360 MCY, an increase of 118 MCY over an estimated additional 89 years of landfill life. However, the permitted maximum annual tonnage would not change and would remain capped at 5 MTY. No increase to the workforce would be needed to accommodate these changes, therefore no impacts to the County from an increased demand for housing or public services would be required for this alternative. The County would benefit from an additional 89 years of landfill life relative to the No Action Alternative.

2.6.3 Mitigation Measures

None required.

2.6.4 Significant Unavoidable Adverse Impacts

No significant adverse impacts related to land use and plan consistency would be expected.

2.7 Aesthetics/Light and Glare

2.7.1 Affected Environment

Visual Character

The following discussion of the visual aspects of the site and surrounding area are summarized from the 1989 Project EIS and 1992 Project SEIS, updated to reflect current conditions.

The landfill is located in a region of south central Washington known for its dry climate, hilly topography, sparse vegetation, and the scenic Columbia River Gorge. The Gorge is heavily used for recreational

fishing, water sports, and other activities. Wood Gulch, located just west of the site, is the most significant topographic feature in the vicinity of the landfill. The walls of the gulch descend to Wood Gulch Creek, which flows south to the Columbia River. The area surrounding the site is characterized by rounded hills, grass, and sparse trees and shrubs.

The appearance of the portions of the site in pasture and wheat cultivation change color seasonally, from bare earth to green and brown crops to brown stubble. They have a consistent, solid texture. The area used for grazing is like other native rangeland in the area. Clumps of grass and sagebrush present a mottled brown, green, and yellow appearance when viewed from nearby locations, and a light brown appearance when viewed from farther away. The remainder of the site consists of open space, the existing MSW landfill and ash monofill, borrow areas, and various landfill facilities (see Figure 3). These provide a variety of colors and textures that contrast with adjacent areas in agricultural use.

Light and Glare

The lights at the landfill that have the greatest potential to be visible offsite are the portable “light plants” used to light the working area when landfilling or daily cover occurs after dark. A light plant consists of a trailer-mounted generator, with a bank of lights mounted on a telescoping standard. Currently, five light plants are used to light the working area. One has a bank of 16 lights, which is typically telescoped to a height of 35-40 feet. The other four have banks of 6 lights, which are typically telescoped to a height of 25-30 feet. The light bulbs are 1000-watt metal halide bulbs, each of which is fully enclosed, with a reflector dish in back and a glass cover in front. To minimize the potential for offsite effects, RDC directs the lights downward and toward the center of the site.

Currently, the working area lights are not visible from the nearest residences or the community of Roosevelt, but the large light plant at the working area is visible from higher elevations at some distance north of the landfill. When fog occurs in the area, the lights at the working area cause a glow in the sky. However, no direct light extends offsite, and the lights do not cause glare on nearby roadways.

There are also banks of lights at the working area of the intermodal yard. However, no change would be expected in the type or location of these lights under the No Action Alternative or the Proposal. Therefore, these lights are not discussed in the impact analysis below.

Litter Potential

High winds at the site can result in windblown litter and associated aesthetic impacts. As discussed in Section 1.4.3, RDC implements aggressive litter control measures to minimize the potential for impacts. These include portable litter control fences placed around the active face of the landfill, and a fixed litter fence with catchment at the eastern boundary (the predominant wind direction is to the east.) Although the portable litter fences are effective much of the time, there can be some accumulation of litter on the site after periods of high winds. RDC has historically maintained a litter patrol of 9-17 people to pick up litter on the site.

2.7.2 Impacts

No Action Alternative:

Visual Character

Over time, as more lined areas are added to the existing MSW landfill, the visual character of the site would change. Portions of the landfill footprint now used for agricultural uses would gradually be developed for waste disposal. Final cover and revegetation would occur 40 to 60 acres at a time when that much area has been filled to capacity and sufficient time has elapsed to allow settlement to occur.

The topography of the landfill footprint would change over time as the landfill expands horizontally and vertically. As evident in the final grading plan in Figure 4, the No Action Alternative would create three ridges 1,820 feet high. The longest ridge (approximately 6,250 feet long) would extend from the top of the southeast side slopes to the northwest corner of the landfill. At either end of this long ridge, there would be a shorter ridge perpendicular to it in the southwest-northeast direction, forming an “H” shape (Figure 4). The northern perpendicular ridge would be approximately 3,250 feet long, while the southern perpendicular ridge would be approximately 4,750 feet long. The sides of the landfill along the longest ridge would be contoured to resemble natural landforms in the site vicinity. When the entire footprint is developed and final cover has been applied and seeded, the landfill would resemble a natural grassy hill, green in winter and spring, and brown in summer and fall.

Changes in the visual character of the site over time would also occur outside the landfill footprint. Some areas currently in agricultural use would be used as borrow areas for clay and rock. Stockpiles of soil materials would be placed near the borrow areas or within the landfill footprint near the place of intended use. As noted previously, after borrow areas are no longer needed, they would be reclaimed and revegetated. Excess soil in stockpiles would also be contoured and revegetated to create a natural appearance. Most of the site would be vegetated following landfill closure, although landfill environmental controls and support facilities would remain for decades to allow post-closure care of the facility.

Visibility of the Landfill

The U.S. Forest Service (1973) uses the following criteria to define the visibility of landscape features at different distances:

- **Foreground:** 0 to 0.25-0.5 mile from the viewer. Within this zone, there is discernment of detail, color, and scale.
- **Middleground:** 0.25-0.5 to 3-5 miles from the viewer. Visual simplification occurs; detail becomes less discernible and color softens.
- **Background:** 3-5 miles to infinity. Objects are viewed mostly as patterns of light and dark.

A visual impact analysis was performed using 3-dimensional (3D) graphical depictions to evaluate the visibility of the landfill from surrounding viewpoints. Landfill final grades and surrounding topography were electronically introduced into the digitized 3D graphical software. Four viewpoints were selected for further analysis, consistent with the 2002 Final Supplemental EIS. The locations of the viewpoints are shown in Figure 9, and 3D depictions are included in Appendix A. The following paragraphs describe the locations of the selected viewpoints, as well as the degree to which the landfill would be visible from each under the No Action Alternative.

- Viewpoint 1 (elevation 1,720 feet) is located on Roosevelt Grade Road (East Road) approximately 1 mile north of the site access road. In the direction of view shown in Figure 9, this viewpoint is approximately 0.2 mile from the landfill footprint. From Viewpoint 1, the view of the No Action Alternative would be of a 3H:1V side slope that rises to almost 1,800 feet and blocks the top of the ridge (see 3D depiction in Appendix A). The top of the ridge would be visible, however, in a more northerly or southerly view direction from the same viewpoint. When landfill operations occur on and above the western side slopes of the landfill, tippers and other operations equipment would be clearly visible. The top of the 3H:1V slope would be approximately the same height as the 1,800-foot hill directly north of this viewpoint, which currently dominates views from this location. However, the landfill would be a much larger landform than this hill.
- Viewpoint 2 (elevation 1,700 feet) is located at the intersection of East Road and Six Prong Road,

a dirt road classified as primitive. In the direction of view, this viewpoint is approximately 1.8 miles from the landfill footprint. The landfill ridge would be barely visible in this view direction (see 3D depictions in Appendix A), but would be visible in a more southerly view direction due to the absence of steep side slopes. As the landfill reaches its final elevations, tippers and other operations equipment would be visible, though indistinct. At closure, the landfill would not be a prominent feature of the landscape – its textures and colors would be similar to those of adjoining land.

- Viewpoint 3 (elevation 1,540 feet) is located on Six Prong Road, approximately at the intersection of Six Prong Road and Whitmore Road, also a dirt road classified as primitive. In the direction of view, this viewpoint is approximately 2.5 miles from the landfill footprint. The entire long ridgeline, as well the northeastern ends of the perpendicular ridges would be visible from this viewpoint (see 3D depictions in Appendix A). As the landfill reaches higher elevations, tippers and other operations equipment may be visible, but would not be readily discernible because of the distance of the viewpoint from the site (2.5 miles). At this distance, the ridgelines of the Proposal would tend to blend in with other ridgelines of similar elevations west of the site.
- Viewpoint 4 (elevation 1,600 feet) is located on Roosevelt Grade Road (East Road) just north of the site access road. In the direction of view, this viewpoint is approximately 0.3 mile from the landfill footprint. The view of the No Action Alternative would be toward a 3H:1V side slope that rises to approximately 1780 feet and blocks the top of the ridge from this viewpoint (see 3D depictions in Appendix A). The top of the ridge would be visible in a more northerly or southerly view direction, however. When landfill operations occur on and above the western side slopes of the landfill, tippers and other operations equipment would be clearly visible.

The 2002 SEIS visual impact analysis indicated that approximately the top 15-20 feet of the northeastern tip of the northern perpendicular ridge might be visible from the nearest residence when the No Action Alternative is at final grade. The nearest residence is located in Pine Creek Canyon approximately 1.2 miles northwest of the site. It appears that the very tip of the ridge might be visible in a narrow view corridor directly down the canyon, unless there are intervening trees between the residence and the landfill site. The No Action Alternative would not be visible at any other angle of view from this residence. Because only a very small portion of the landfill (if any) might be visible, the view corridor would be narrow, and no significant views would be blocked; this is not considered a significant view impact.

The completed landfill would also be potentially visible within a 3-mile radius from some other areas to the west, northwest, north, northeast, and east, but not from the other nearest residence. That residence is located in a low area, with nearby hills that would screen the landfill from view. The landfill would also not be visible within a 3-mile radius from the south or southeast. From the southwest, the completed landfill would be visible only from Roosevelt Grade Road (East Road) adjacent to the site. It would not be visible from Roosevelt or from SR 14. However, at the maximum elevation of 1,820 feet MSL under the No Action Alternative, the upper elevations would be visible from a stretch of I-84 approximately 1 to 2.5 miles west of Arlington (southwest of the landfill).

In general, the No Action Alternative would alter the topography visible from local viewpoints. However, there would be little public exposure to views of the landfill, the landfill would be similar in color and texture to other hills in the vicinity, and there would be no blockage of significant views. Therefore, impacts on visual quality would not be significant.

Light and Glare

As the elevation of the landfill increases under the No Action Alternative, the lights on the working area would become visible from more offsite locations. At locations described above from which the top of

the landfill would be visible, the working area lights would likely be visible before the top of the landfill comes into view. This includes some areas within a 3-mile radius to the west, northwest, north, northeast, and east. The lights would also be visible at times from Roosevelt Grade Road (East Road) southwest of the site, and as the landfill reaches its final elevations, from a stretch of I-84 approximately 1 to 2.5 miles west of Arlington (this view would be at a distance greater than 3 miles).

When operations are occurring near final elevation on the northwestern end of the landfill ridge, the working area lights may be visible from the nearest residence, located in Pine Creek canyon approximately 1.2 miles northwest of the site. To minimize the potential visibility of working area lights from the nearest residence, RDC would continue to direct the lights downward and toward the center of the site, and if necessary would reduce the height of the standards to the extent feasible. The lights would likely not be visible from the other residence 1.7 miles north of the site. The lights would also not be visible from the community of Roosevelt or SR 14. No direct light would extend to offsite areas, and there would be no glare effect on nearby roadways.

Litter Potential

As annual tonnage increased under the No Action Alternative, the working face of the landfill would become larger to accommodate additional tippers, dozers, and compactors. As a result, there would be an increase in litter potential. RDC would keep the size of the working face at the minimum necessary to allow equipment to operate. In addition, as discussed in Section 1.4.3, RDC would take whatever measures are necessary to control litter at the site, including adding more and higher portable and fixed litter fences, and additional litter patrol personnel.

Proposed Action: Visual Character

The discussion of the changes in visual character of the landfill site under the No Action Alternative also generally applies to the Proposal. However, the mass of the landfill would be noticeably greater under the Proposed Action. The landfill would be graded to a single top-deck with a maximum elevation of approximately 2,050 feet MSL in the northwest corner, graded down at a 5% inclination to the southeast where the minimum top deck elevation is 1,800 feet MSL.

The following paragraphs describe the 3D graphical depictions from the four selected viewpoints (discussed above), as well as the degree to which the landfill would be visible from each under the Proposed Action:

- Viewpoint 1 (elevation 1,720 feet, 0.2 mile from landfill footprint). In the direction of view shown in Figure 9, the view of the Proposed Action would be toward the southeast end of the northern perpendicular ridge described above. Whereas the view of the No Action Alternative would be up a 3H:1V slope to the top of the 1,820-foot ridge, the view of the Proposed Action would be of a larger 3H:1V sideslope that rises to almost 2,050 feet (see 3D depictions in Appendix A). The top of the landfill in the northwest corner would be visible. When landfill operations occur on and above the western sideslopes of the landfill, tippers and other operations equipment would be clearly visible. The top of the 3H:1V slope would be approximately 250 feet higher than the 1,800-foot hill directly north of this viewpoint, which currently dominates views from this location.
- Viewpoint 2 (elevation 1700 feet, 1.8 miles from landfill footprint). In the direction of view shown in Figure 9, the view of the Proposed Action would be toward a 3H:1V sideslope that rises to the top of the landfill at approximately 2,050 feet. The landfill ridge would be clearly visible in this view direction (see 3D depictions in Appendix A). As the landfill reaches its final elevations, tippers and other operations equipment would be visible, though indistinct from this

distance. At closure, the landfill would be a moderately prominent feature of the landscape, but its textures and colors would be similar to those of adjoining land.

- Viewpoint 3 (elevation 1,540 feet, 2.5 miles from landfill footprint). In the direction of view shown in Figure 9, the prominent view of the Proposed Action would be toward the northeastern corner of the landfill, where the top deck ridge peaks out at approximately 1,970 feet. The entire northern ridgeline would be visible from this viewpoint (see 3D depictions in Appendix A). As the landfill reaches higher elevations, tippers and other operations equipment may be visible, but would not be readily discernible because of the distance of the viewpoint from the site (2.5 miles). At this distance, the ridgelines of the Proposed Action would be moderately distinguishable from other ridgelines of lower height to the west of the site.
- Viewpoint 4 (elevation 1,600 feet, 0.3 mile from landfill footprint). In the direction of view shown in Figure 9, the view of the Proposal would be toward the western side slope of the landfill. Whereas the view of the No Action Alternative from this viewpoint would be up a 3H:1V slope that dominates the right half of the field of view from this viewpoint, the view of the Proposed Action would be toward a 3H:1V sideslope that dominates the entire field of view from this viewpoint (see 3D depictions in Appendix A). The top of the ridge would be similar to the No Action Alternative on the right side of the field of view from this viewpoint, and the left side of the field of view from this viewpoint would add an approximate 225 foot 3H:1V side slope to the top of the ridge at approximately 2000 feet. The top of the landfill in the northwestern corner would not be visible from this viewpoint. When landfill operations occur on and above the western sideslopes of the landfill, tippers and other operations equipment would be clearly visible.

In general, the Proposed Action's greater mass compared to the No Action Alternative would be evident from these viewpoints. However, like the No Action Alternative, there would be little public exposure to views of the landfill, the landfill would be similar in color and texture to other hills in the vicinity, and there would be no blockage of significant views. Therefore, impacts on visual quality would not be significant.

Like the No Action Alternative, the upper elevations of the Proposed Action would be visible from a stretch of I-84 approximately 1 to 2.5 miles west of Arlington, Oregon. The Proposed Action would be somewhat more visible than the No Action Alternative from this stretch of I-84 because of the increase in maximum elevation. Nonetheless, at the distance of this stretch of I-84 from the site (over 3 miles), the landfill would likely be indistinguishable from surrounding hills.

Light and Glare

The discussion of light and glare under the No Action Alternative also generally applies to the Proposed Action. Because more of the landfill would be at higher elevations, there would be a greater potential for working area lights to be visible from offsite locations, including the nearest residence, as the landfill reaches its final elevations. To minimize the potential visibility of working area lights from the nearest residence, RDC would continue to direct the lights downward and toward the center of the site, and if necessary would reduce the height of the standards to the extent feasible.

Litter Potential

As the annual tonnage increases under the Proposed Action, the working face of the landfill would gradually increase to accommodate additional tippers and other equipment. There would be no change to the size of the working face relative to the No Action Alternative; therefore, the potential for windblown litter would be no greater. RDC would keep the size of the working face at the minimum necessary to allow equipment to operate. In addition, as discussed in Section 1.4.3, RDC would take whatever measures

are necessary to control litter at the site, including adding more and higher portable and fixed litter fences, and additional litter patrol personnel.

2.7.3 Mitigation Measures

Since the Proposed Action would increase the visibility of the night work and working face, the following mitigation measures are recommended:

- RDC should evaluate the required night light height and determine whether shorter lighting would be possible, taking into consider the need to maintain safe night-time working conditions.

RDC must take whatever measures are necessary to provide adequate litter control, including adding more and higher portable and fixed litter fences and additional litter patrol personnel to minimize litter generation from the landfill face.

2.7.4 Significant Unavoidable Adverse Impacts

With the mitigation measures incorporated into the project, no significant adverse impacts related to aesthetics/light and glare would be expected.

Section 3

References

Section 3. References

Geomatrix, 2006. Letter Report Re: Roosevelt Regional Landfill Intermodal Facility Expanded Hours of Operation Noise Study, 12536.000.0, July 12, 2006.

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U.S. Forest Service, 1973. Distance zones used in landscape management. In Klickitat County, 1992.

Section 4

Distribution List

Section 4. Distribution List

The following agencies, organizations, and individuals were sent a copy of the Draft SEIS and the Final SEIS. The Final SEIS is available at the Klickitat County Planning Department and other public review locations indicated below.

Klickitatcountysolidwaste@klickitcounty.org

Dan Christopher
Board of County Commissioners
danc@klickitatcounty.org

Lynn Ward
Klickitat County Building & Compliance Director
lynnw@klickitatcounty.org

Klickitat Co. Prosecuting Attorney
rebeccas@klickitatcounty.org
davidq@klickitatcounty.org

WatsonD@wsdot.wa.gov
sw-sepa-review@wsdot.wa.gov
VanAntB@wsdot.wa.gov
gilkc@wsdot.wa.gov

Brian Yearout
WA State Parks and Recreation Commission
Brian.Yearout@parks.wa.gov

Yakama Indian Nation Cultural Resources
PO Box 151
Toppenish, WA 98948

Fire District #9 rural9office@gmail.com

Fire District #2
PO BOX 82
Bickleton, WA 99322

Jacob Anderson
Board of County Commissioners
jacoba@klickitatcounty.org

Gordon Kelsey
KC Public Works Director

Amber Johnson, WDFW
amber.johnson@dfw.wa.gov
Mike Ritter, WDFW
Michael.Ritter@dfw.wa.gov
[US Fish & Wildlife](http://USFish&Wildlife)
Stephen.Lewis@fws.gov

WA State Dept. of Ecology
crosepacoordinator@ecy.wa.gov
sepaunit@ecy.wa.gov

WA Dept of A & H P
sepa@dahp.wa.gov
Dept. of drinking water
Jamie.gardipe@doh.wa.gov

Yakama Indian Nation
Tribal Council
PO Box 151
Toppenish, WA 98948

Columbia River Gorge Commission
PO BOX 730
White Salmon, WA 98672

Casey Gatz, Land Management Planner
Forest Service Columbia River Gorge National
Scenic Area cgatz@fs.fed.us

The Columbia Gorge News
waneews@gorgenews.com
Goldendale Sentinel
imarzeles@goldendalesentinel.com

Federal Aviation Administration
Northwest Mountain Region
2200 S. 216th Street
Des Moines, WA 98198

Klickitat County Natural Resources
Economic Development
davem@klickitatcounty.org

Kimberly N. Peacher
Community Planning and Liaison Officer
Northwest Training Range Complex
Kimberly.peacher@navy.mil

National Park Service
Pacific West Region
333 Bush Street, Suite 500
San Francisco, CA 94104-2828

Confederated Tribes of the
Umatilla Indian Reservation
6411 Timine Way
Pendleton , OR 97801

USDA NRCS Goldendale Office
1107 South Columbus Ave
Goldendale WA 98620

US EPA Region 10
1200 Sixth Ave Ste155
Seattle, WA 98101

Roosevelt School District
PO BOX 248
Roosevelt, WA 99356

City of Goldendale
pmunyan@ci.goldendale.wa.us
mcanon@ci.goldendale.wa.us

City of White Salmon
Administrator@ci.white-salmon.wa.us
Mayor@ci.white-salmon.wa.us

WA UTC
621 Woodland Square Lp SE
Lacey, WA 98503

UNITED STATES OF AMERICA
PO BOX 2946
PORTLAND OR 97208-2946

NATIVE AMERICAN LANDS
PO BOX 632
TOPPENISH WA 98948

PINE CREEK RANCHES LLC
1489 EAST RD
BICKLETON WA 99322

DAVENPORT, JIMJACK
486 HOCTOR RD
GOLDENDALE WA 98620

Dave Sauter
Board of County Commissioners

Klickitat Co. Assessor- email
realproperty@klickitatcounty.org

Health Dept. David Kavanaugh
Davidk@klickitatcounty.org &
Marty Hudson Weed Control
martyh@co.klickitat.wa.us

PUD Contacts aestey@klickpud.com
mgarner@klickpud.com
lmata@klickpud.com
rpatton@klickpud.com water/sewer
sblodgett@klickpud.com
Bwalter@klickpud.com

becky.kennedy@dnr.wa.gov
WA State Dept. of Natural Resource
DNR SEPA CENTER: sepacenter@dnr.wa.gov

Confederated Tribes of Warm Springs
1233 Veterans Street, PO Box C
Warm Springs , OR 97761

Federal Hwy Administration
1200 New Jersey Ave SE
Washington DC 20590

WHITMORE & SON INC
1 WHITMORE RD
BICKLETON WA 99322

YAKAMA Indian Nation contacts
enviroreview@yakama.com
elizabeth_sanchez@yakama.com
phil_rigdon@yakama.com ethan@yakamanation-olc.org
kate_valdez@yakama.com
jessica_lally@yakama.com
jeanette@ykfp.org
BKent@yakama.com
Bureau of Indian Affairs
rocco.clarkjr@bia.gov

Evan Carnes- Army Corp
5525 S. 11th St Ridgefield WA 98642
206 316 3049
Evan.g.carnes@usace.army.mil

WSDOT Aviation
PO Box 47361
Olympia, WA 98504

Bickleton School District
P O Box 10
Bickleton, WA 99322

City of Bingen
cityhall@bingenwashington.org

WHITE RANCH INC
782 OLD HWY 8
ROOSEVELT WA 99356

David Niemela
527 Cameron Rd
Centerville, WA 98613

Section 5

Comments and Responses

Section 5. Comments and Responses

This section contains comments and comment letters on the Draft SEIS that were received from the 30-day public comment period that took place between September 15, 2022 and October 17, 2022. Following each comment letter are responses to the comments.

The responsible official received one comment letter and one in-person verbal comment. The comments are listed below in the order in which they are included in this section.

- Washington Department of Ecology, Lucila Cornejo, SEPA Coordinator, letter dated October 13, 2022 (see response on page 28).
- Verbal comment received at the Klickitat County Planning Department counter by Mr. David Niemela on October 7, 2022 (see response on page 29).



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Central Region Office
1250 West Alder St., Union Gap, WA 98903-0009 • 509-575-2490

October 13, 2022

Lori Anderson
Klickitat County
115 West Court St
Goldendale, WA 98620

RE: 202204661, SEPA2022-19

Dear Lori Anderson,

Thank you for the opportunity to comment on the Environmental Impact Statement for the SEPA2022-19 Roosevelt Regional Landfill. We have reviewed the documents and have the following comments.

WATER QUALITY

Project with Potential to Discharge Off-Site

If your project anticipates disturbing ground with the potential for stormwater discharge off-site, the NPDES Construction Stormwater General Permit is recommended. This permit requires that the SEPA checklist fully disclose anticipated activities including building, road construction and utility placements. Obtaining a permit may take 38-60 days.

The permit requires that a Stormwater Pollution Prevention Plan (Erosion Sediment Control Plan) shall be prepared and implemented for all permitted construction sites. These control measures must be able to prevent soil from being carried into surface water and storm drains by stormwater runoff. Permit coverage and erosion control measures must be in place prior to any clearing, grading, or construction.

In the event that an unpermitted Stormwater discharge does occur off-site, it is a violation of Chapter 90.48 RCW, Water Pollution Control and is subject to enforcement action.

More information on the stormwater program may be found on Ecology's stormwater website at: <http://www.ecy.wa.gov/programs/wq/stormwater/construction/>. Please submit an application or contact Lloyd Stevens, Jr. at the Dept. of Ecology, (509) 571-3866 or lloyd.stevensjr@ecy.wa.gov with questions about this permit.

Sincerely,

Lucila Cornejo

Lucila Cornejo
SEPA Coordinator
Central Regional Office
(509) 208-4590
lcrosepacordinator@ecy.wa.gov

Response to Washington Department of Ecology, Lucila Cornejo, SEPA Coordinator, letter dated October 13, 2022

The Roosevelt Regional Landfill is subject to the State’s Industrial Stormwater General Permit (ISGP) and has active permit coverage. As part of that coverage, the facility has an Industrial Stormwater Pollution Prevention Plan (SWPPP). In accordance with the ISGP, the landfill must update their SWPPP “...*whenever there is a change in design, construction, operation, or maintenance at the facility that significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged.*” Accordingly, the SWPPP update will include update of the SWPPP site mapping in accordance with the ISGP Section S3. B.1, list of pollutants, discharge locations, and proposed best management practices. The commenter recommends that the landfill apply for a Construction Stormwater General Permit for any anticipated ground disturbance associated with the proposal that has potential for stormwater discharge off-site. However, dual coverage under both the Industrial and Construction Stormwater Permits is not required. Since the proposed landfill vertical expansion is to be part of the facility’s operational industrial activities, implementation of stormwater management protections is subject to the ISGP.

Update of the existing facility SWPPP must be completed prior to implementation of any of the planned operational modifications.

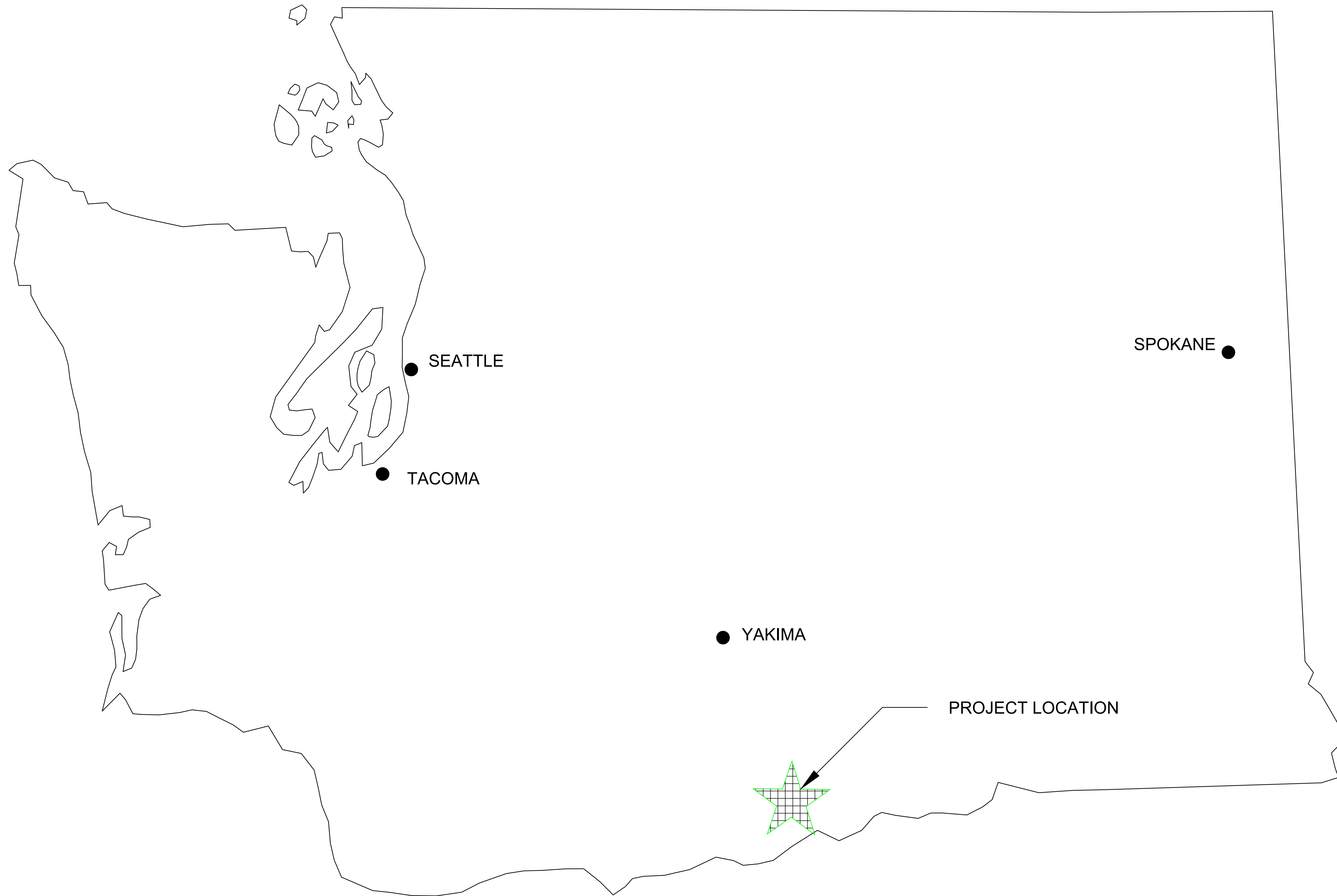
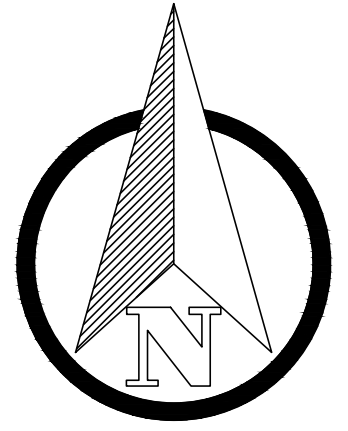
Verbal comment received at the Klickitat County Planning Department counter by Mr. David Niemela on October 7, 2022

The basis of the verbal comment was to ensure "the fire and emergency response plans, remain in place; and all managers, supervisors and lead personnel will be trained in first aid, including CPR."

Response to Verbal comment received at the Klickitat County Planning Department counter by Mr. David Niemela on October 7, 2022

The only change in conditions for the conditional use permit (CUP) is condition #7.6 regarding the maximum elevation of the landfill. All other conditions will stay in place, including but not limited to Section 3.0 of the CUP, which address Fire Protection and Medical Emergency Plans and specifically, Section 3.5 – Medical or Personal Injury Emergency which requires that “all managers, supervisors, and lead personnel will be trained in first aid, including CPR.”

Figures

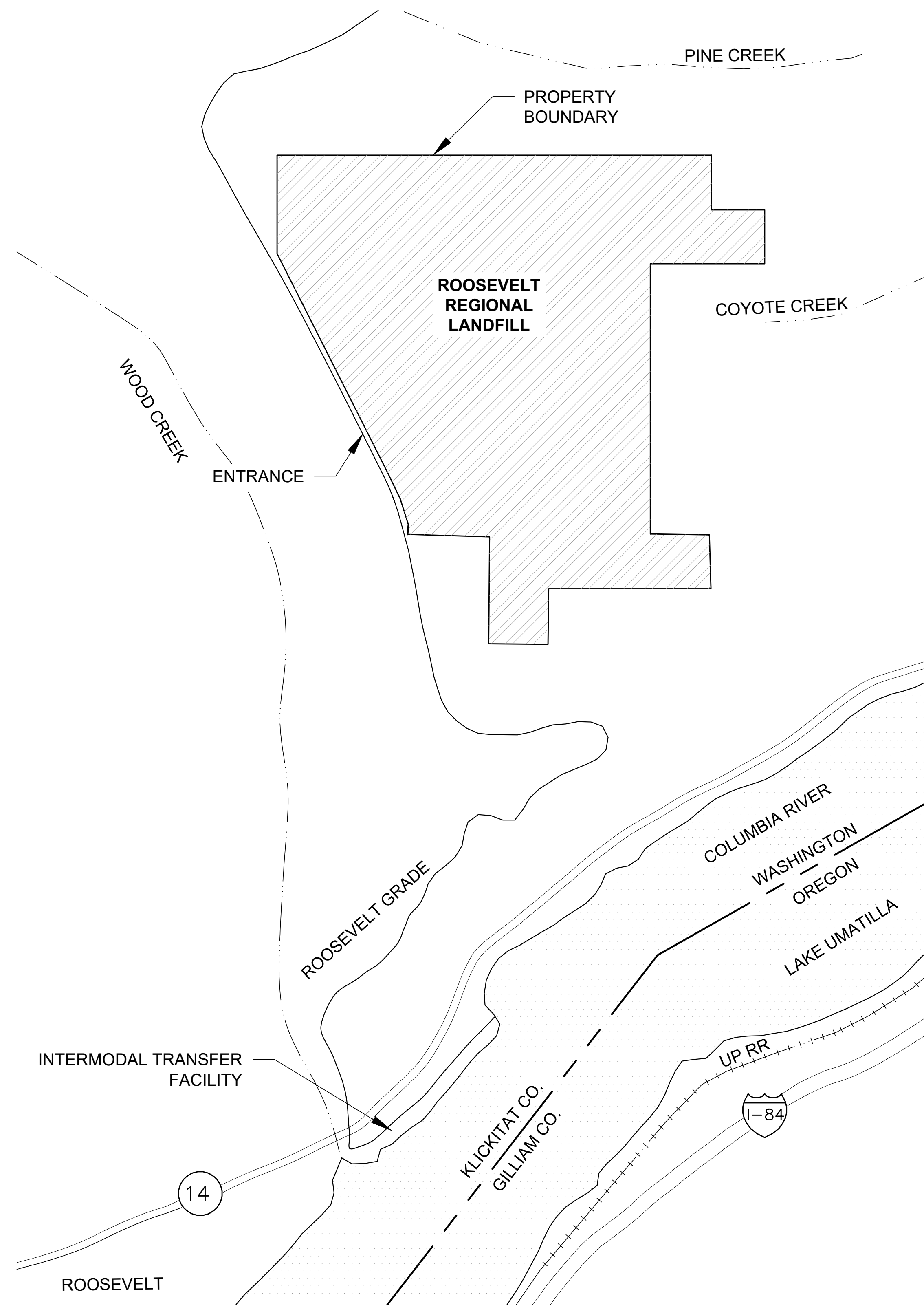
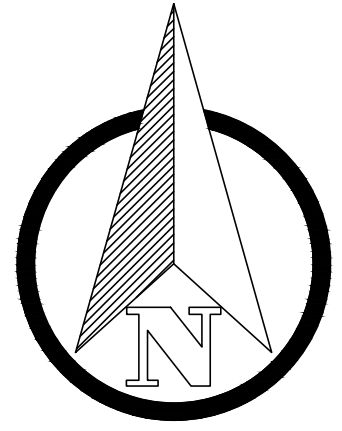


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SITE LOCATION			PROJECT NO. AU20.1209.00
DATE OF ISSUE:	11/19/2021	DRAWN BY:	CRP
APPROVED BY:		SAH	

Geo-Logic
ASSOCIATES

803 SW Industrial Way, Suite 211, Bend, OR 97702
geo-logic.com | 541.678.5733

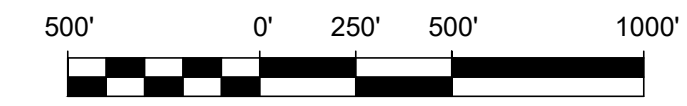
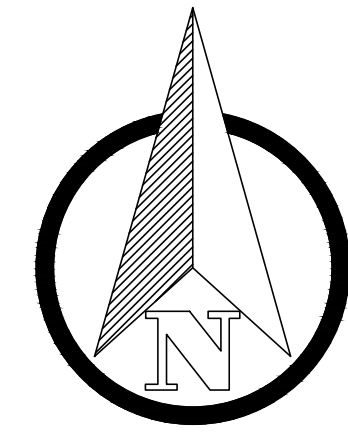
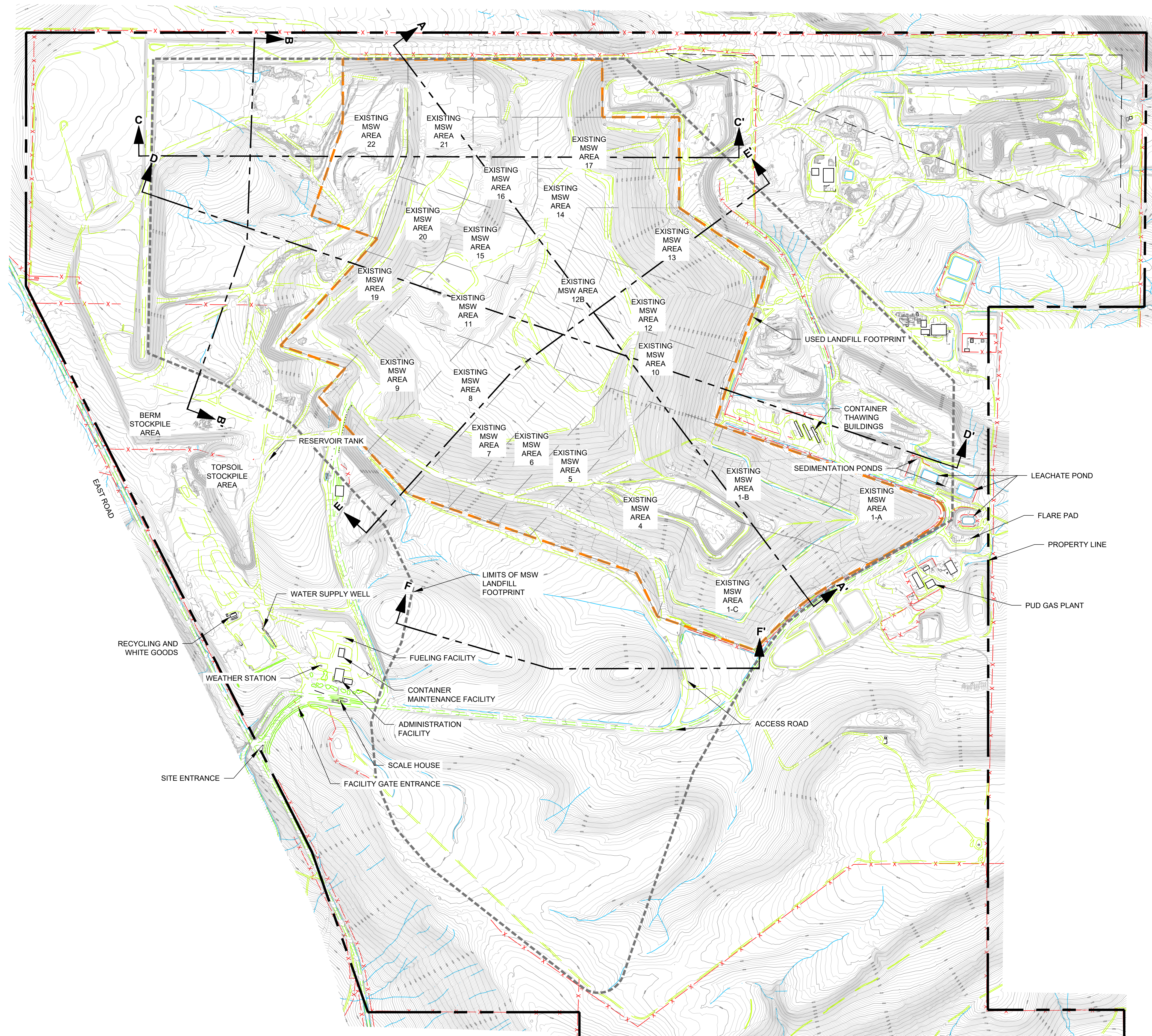


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DATE OF ISSUE:	11/19/2021	DRAWN BY:	CRP
APPROVED BY:		SAH	
803 SW Industrial Way, Suite 211, Bend, OR 97702 geo-logic.com 541.678.5733			

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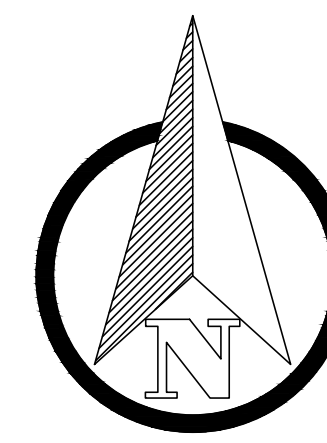
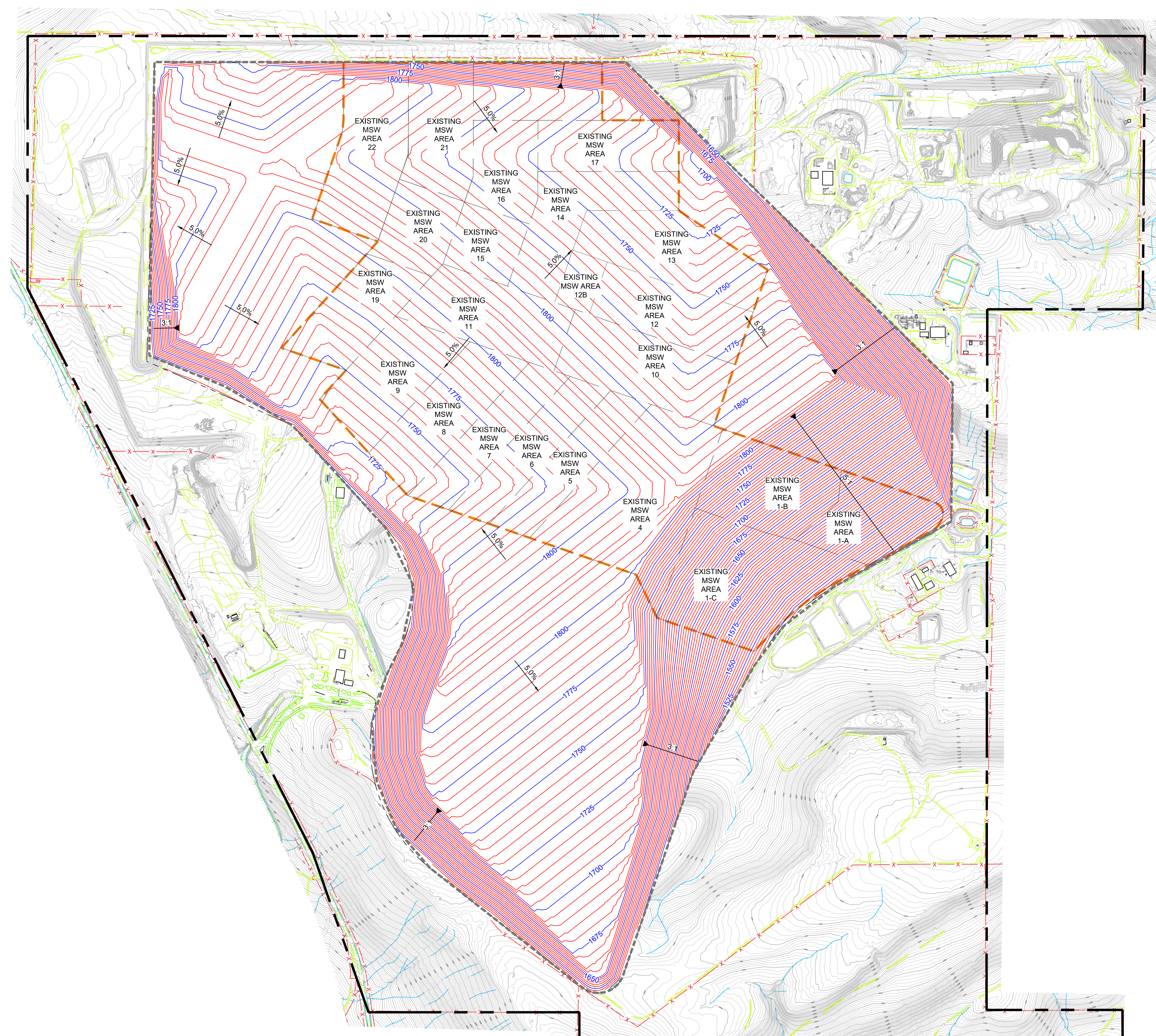
- 1700 — EXISTING 10' CONTOUR⁽¹⁾
- 2' — EXISTING 2' CONTOUR⁽¹⁾
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- — — EXISTING PAVED ROAD
- — — EXISTING UNPAVED ROAD
- — — EXISTING LINER LIMITS
- - - - - LIMITS OF MONFILL AREA
- — — EXISTING DRAINAGE
- — — PROPERTY LINE
- - - - - LIMITS OF MSW LANDFILL FOOTPRINT
- - - - - USED LANDFILL FOOTPRINT

NOTES
 1. AERIAL TOPOGRAPHY BASED ON MARCH 30, 2021 PERFORMED BY COOPER AERIAL SURVEY COMPANY.

ROOSEVELT REGIONAL LANDFILL MAXIMUM ELEVATION INCREASE - SEIS ROOSEVELT, WASHINGTON SITE PLAN		FIGURE NO. 3 PROJECT NO. AU20.1209.00
DATE OF ISSUE:	11/19/2021	DRAWN BY: CRP
		APPROVED BY: SAH
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N:\ROOSEVELT\AU20.1209 VERTICAL EXPANSION\6. ENGINEERING\1. CIVILDRAWINGS\FIGURES\FIGURE 5 - FINAL GRADING PLAN - NAA.DWG November 19, 2021 - 9:31 AM BY: GLA USER



LEGEND

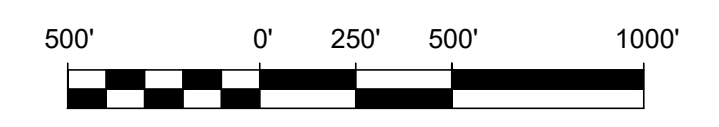
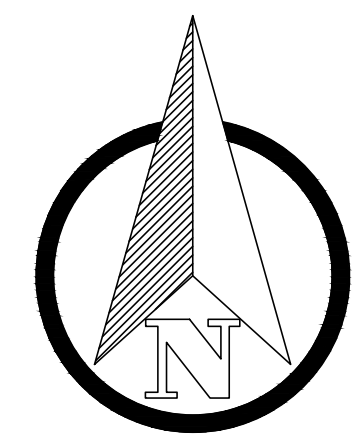
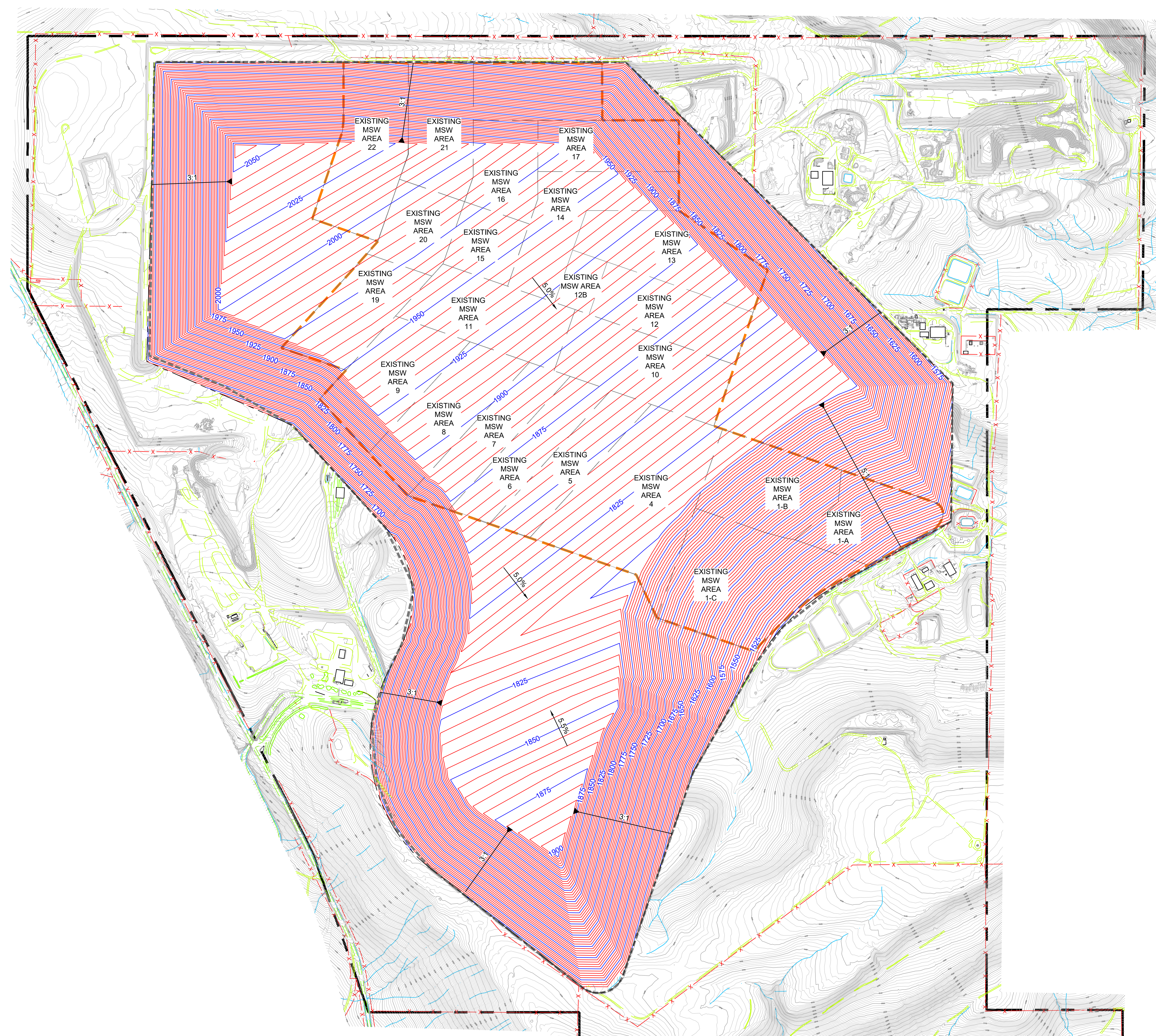
- 1700 EXISTING 10' CONTOUR⁽¹⁾
- EXISTING 2' CONTOUR⁽¹⁾
- 1700 FINAL GRADING 25' CONTOUR
- FINAL GRADING 5' CONTOUR
- x-x-x- EXISTING FENCE
- EXISTING PAVED ROAD
- - - EXISTING UNPAVED ROAD
- EXISTING DRAINAGE
- - - - PROPERTY LINE
- - - - - LIMITS OF MSW LANDFILL FOOTPRINT
- EXISTING LINER LIMITS
- - - - USED LANDFILL FOOTPRINT

NOTES
 1. AERIAL TOPOGRAPHY BASED ON MARCH 30, 2021 PERFORMED BY COOPER AERIAL SURVEY COMPANY.

ROOSEVELT REGIONAL LANDFILL MAXIMUM ELEVATION INCREASE - SEIS ROOSEVELT, WASHINGTON FINAL GRADING PLAN - NO ACTION ALT.		FIGURE NO. 4 PROJECT NO. AU20.1209.00
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N:\ROOSEVELT\AU20.1209 VERTICAL EXPANSION\6. ENGINEERING\1. CIVIL DRAWINGS\FIGURES\FIGURE 7 - FINAL GRADING PLAN_PROPOSED ACTION - NAA.DWG November 19, 2021 - 9:35 AM BY: GLA USER



LEGEND

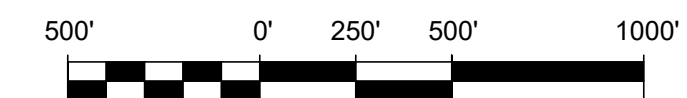
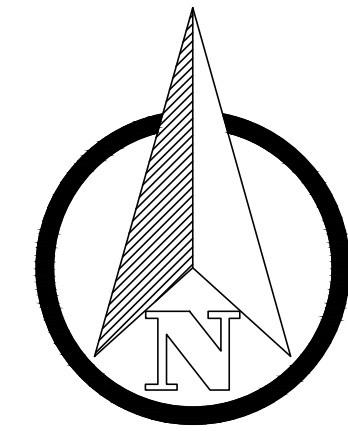
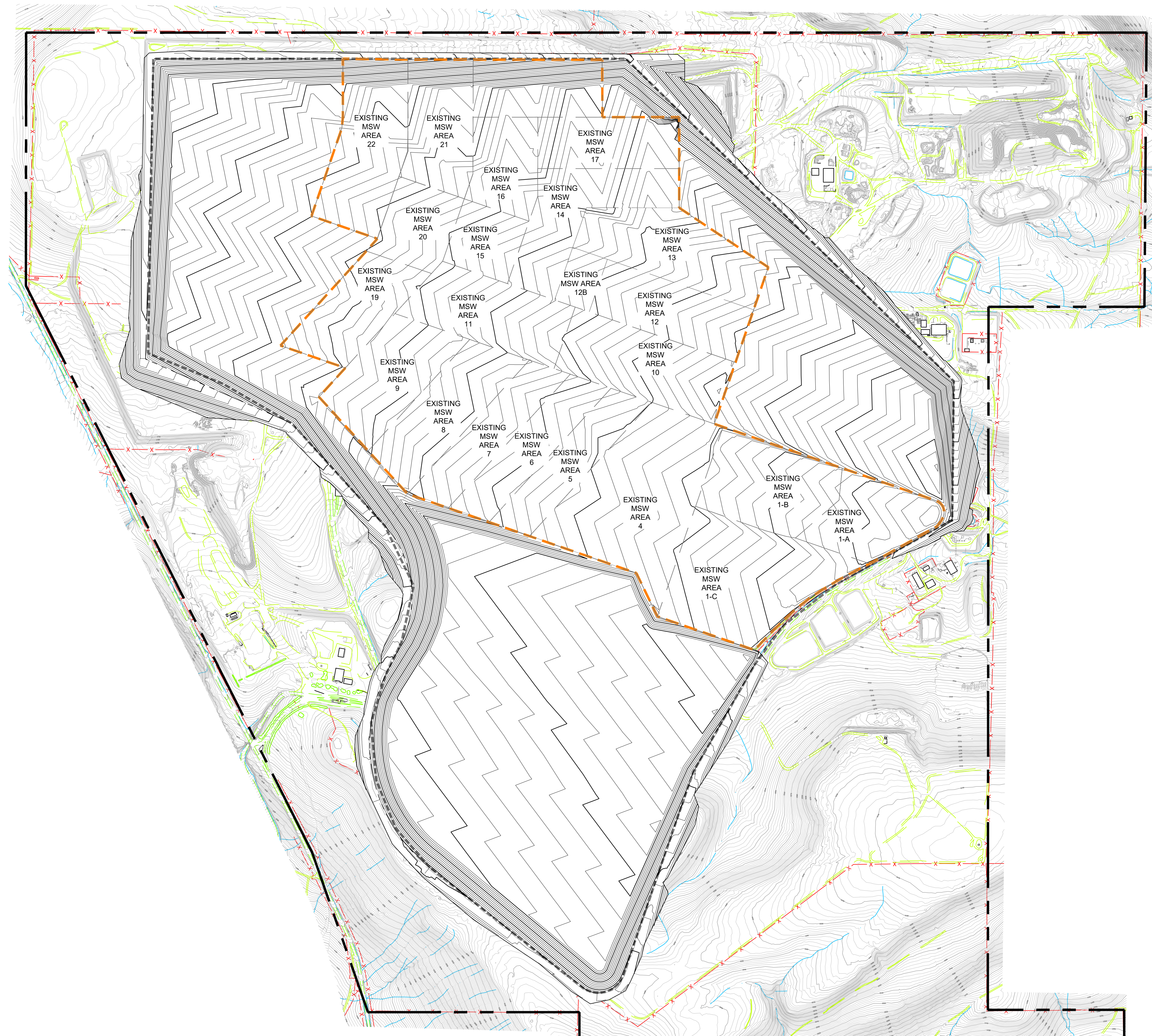
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- 1700 — EXISTING 2' CONTOUR⁽¹⁾
- 1700 — BOTTOM GRADING 10' CONTOUR
- 1700 — BOTTOM GRADING 2' CONTOUR
- x - x - x - EXISTING FENCE
- - - - EXISTING PAVED ROAD
- - - - EXISTING UNPAVED ROAD
- - - - EXISTING LINER LIMITS
- - - - EXISTING DRAINAGE
- - - - PROPERTY LINE
- - - - LIMITS OF MSW LANDFILL FOOTPRINT
- - - - EXISTING LINER LIMITS
- - - - USED LANDFILL FOOTPRINT

NOTES
 1. AERIAL TOPOGRAPHY BASED ON MARCH 30, 2021 PERFORMED BY COOPER AERIAL SURVEY COMPANY.

ROOSEVELT REGIONAL LANDFILL MAXIMUM ELEVATION INCREASE - SEIS ROOSEVELT, WASHINGTON		FIGURE NO. 5
FINAL GRADING PLAN - PROPOSED ACTION		PROJECT NO. AU20.1209.00
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N:\ROOSEVELT\AU20.1209 VERTICAL EXPANSION\6 ENGINEERING\1 CIVILDRAWINGS\FIGURE 6 - BOTTOM GRADING PLAN_PROPOSED ACTION - NAA.DWG November 19, 2021 - 10:57 AM BY: GLA USER




LEGEND

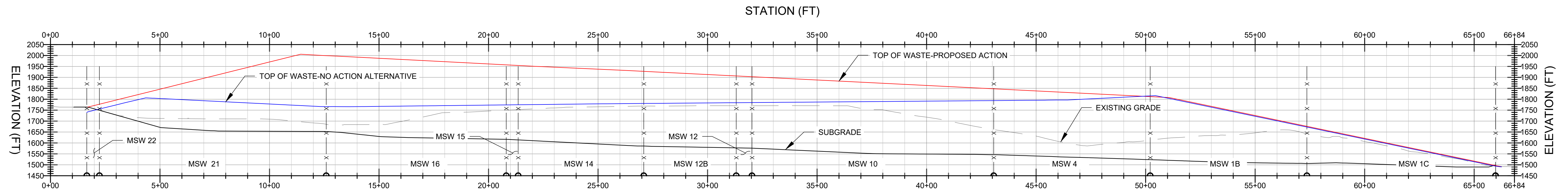
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- 1700 — EXISTING 2' CONTOUR⁽¹⁾
- 1700 — BOTTOM GRADING 25' CONTOUR⁽²⁾
- 1700 — BOTTOM GRADING 5' CONTOUR⁽²⁾
- x - x - x - EXISTING FENCE
- — — EXISTING PAVED ROAD
- — — EXISTING UNPAVED ROAD
- - - - EXISTING LINER LIMITS
- — — EXISTING DRAINAGE
- — — PROPERTY LINE
- - - - LIMITS OF MSW LANDFILL FOOTPRINT
- - - - EXISTING LINER LIMITS
- - - - USED LANDFILL FOOTPRINT

NOTES

1. AERIAL TOPOGRAPHY BASED ON MARCH 30, 2021 PERFORMED BY COOPER AERIAL SURVEY COMPANY.
2. ACTUAL BASE GRADES OF THE LANDFILL MAY VARY BASED ON FINAL CELL DESIGNS AT THE TIME OF CONSTRUCTION.

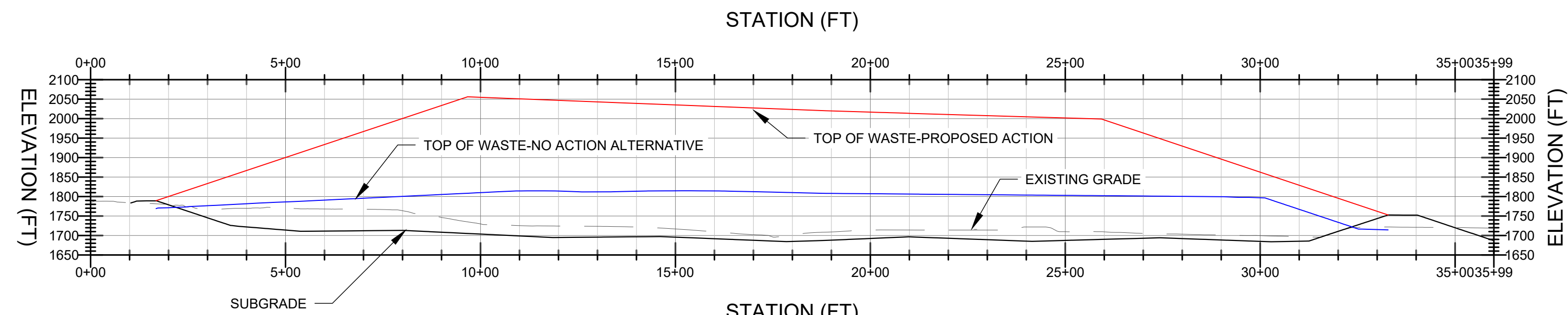
ROOSEVELT REGIONAL LANDFILL MAXIMUM ELEVATION INCREASE - SEIS ROOSEVELT, WASHINGTON SUBGRADE PLAN			FIGURE NO. 6 PROJECT NO. AU20.1209.00		
DATE OF ISSUE:	11/19/2021	DRAWN BY:	CRP	APPROVED BY:	SAH
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SECTION A-A'

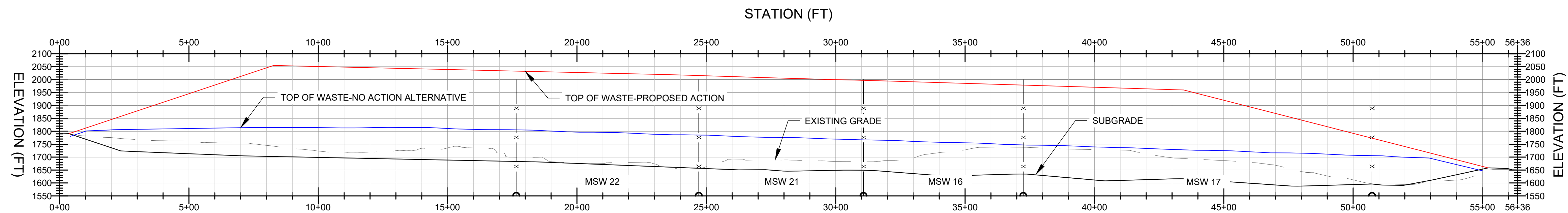
HORIZ. SCALE: 1" = 250'
VERT. SCALE: 1" = 125'



SECTION B-B'

HORIZ. SCALE: 1" = 250'
VERT. SCALE: 1" = 125'

- LEGEND**
- — — — — EXISTING GRADE
 - — — — — TOP OF WASTE - NO ACTION ALTERNATIVE
 - — — — — TOP OF WASTE - PROPOSED ACTION
 - — — — — SUBGRADE
 - x — x — CELL LIMIT



SECTION C-C'

HORIZ. SCALE: 1" = 250'
VERT. SCALE: 1" = 125'

ROOSEVELT REGIONAL LANDFILL MAXIMUM ELEVATION INCREASE - SEIS ROOSEVELT, WASHINGTON SECTIONS			FIGURE NO. 7 PROJECT NO. AU20.1209.00
DATE OF ISSUE:	11/19/2021	DRAWN BY:	CRP
		APPROVED BY:	SAH

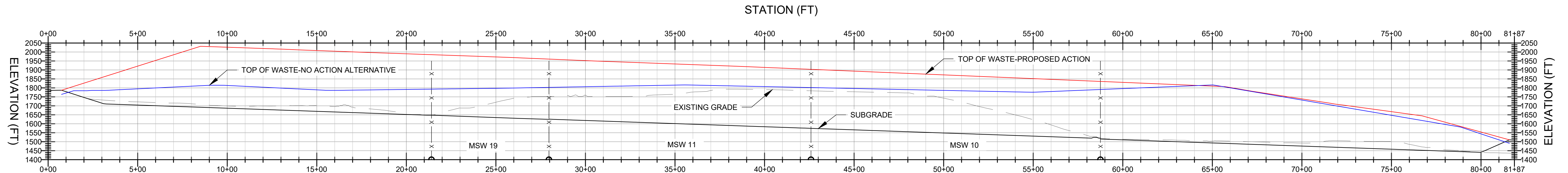


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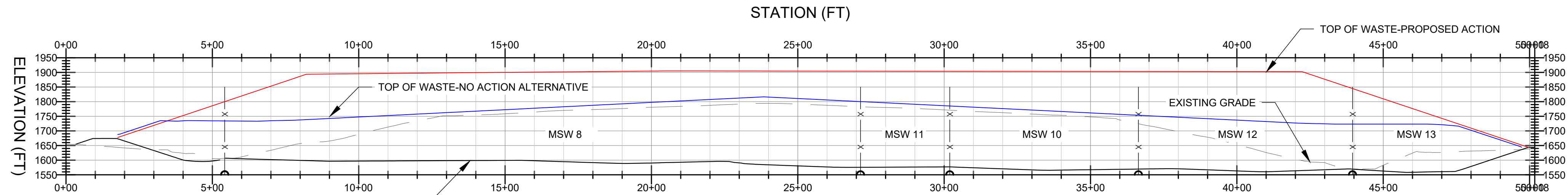
N:\ROOSEVELT\AU20.1209 VERTICAL EXPANSION\6. ENGINEERING\1. CIVIL\DRAWINGS\FIGURES\SECTIONS.DWG November 19, 2021 - 9:41 AM BY: GLA USER

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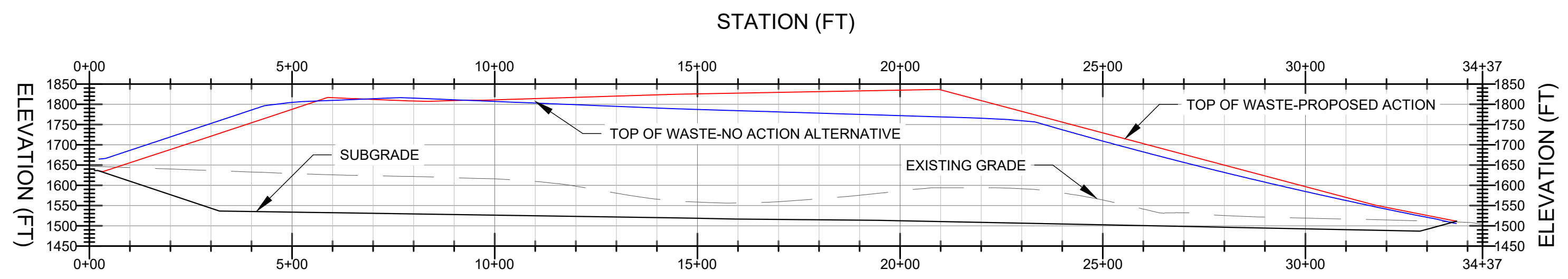
N:\ROOSEVELT\AU20.1209 VERTICAL EXPANSION\6 ENGINEERING\1 CIVILDRAWINGS\FIGURES\SEIS\SEIS\SEIS\FIGURES\FIGURES.DWG November 19, 2021 - 9:41 AM BY: GLA USER



STATION (FT)
SECTION D-D'
 HORIZ. SCALE: 1" = 300'
 VERT. SCALE: 1" = 150'



STATION (FT)
SECTION E-E'
 HORIZ. SCALE: 1" = 250'
 VERT. SCALE: 1" = 125'



STATION (FT)
SECTION F-F'
 HORIZ. SCALE: 1" = 250'
 VERT. SCALE: 1" = 125'

LEGEND

- — — — — EXISTING GRADE
- — — — — TOP OF WASTE - NO ACTION ALTERNATIVE
- — — — — TOP OF WASTE - PROPOSED ACTION
- — — — — SUBGRADE
- x — x — CELL LIMIT

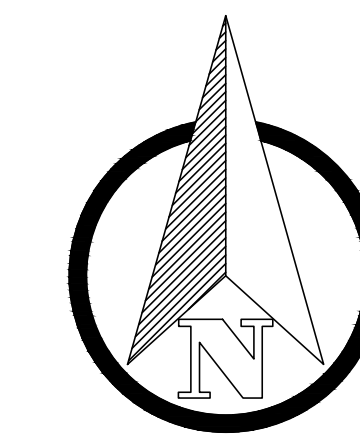
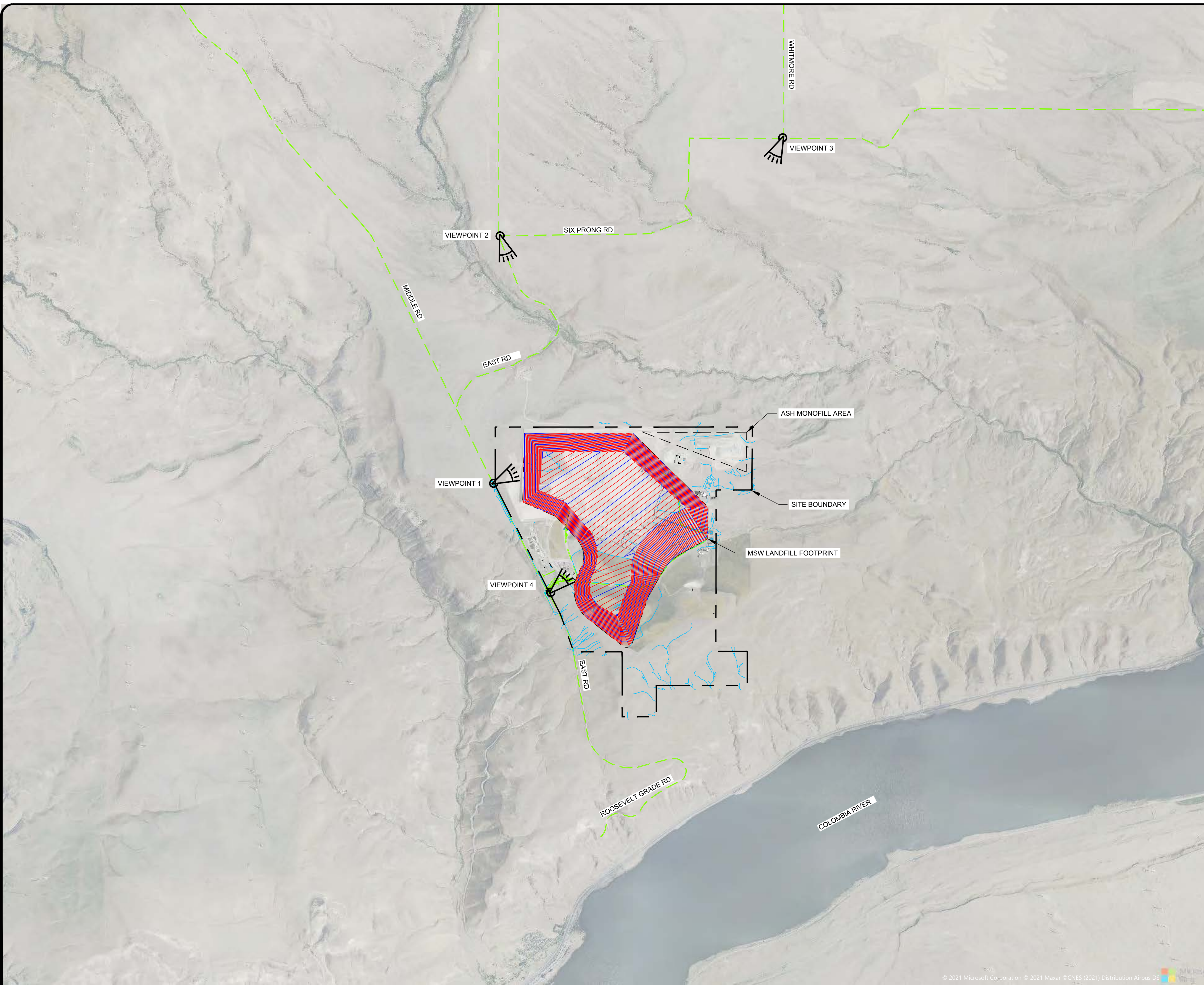
ROOSEVELT REGIONAL LANDFILL MAXIMUM ELEVATION INCREASE - SEIS ROOSEVELT, WASHINGTON			FIGURE NO. 8
SECTIONS			PROJECT NO. AU20.1209.00
DATE OF ISSUE:	11/19/2021	DRAWN BY:	CRP
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N:\ROOSEVELT\AU20.1209\VERTICAL EXPANSION\6 ENGINEERING\1 CIVILDRAWINGS\FIGURES\FIGURE 10 - VIEW LOCATIONS.DWG November 19, 2021 - 9:43 AM BY: GLA USER



LEGEND

- PROPOSED 50' CONTOUR
- PROPOSED 10' CONTOUR
- EXISTING PAVED ROAD
- - - LIMITS OF MONFILL AREA
- EXISTING DRAINAGE
- - - PROPERTY LINE

ROOSEVELT REGIONAL LANDFILL MAXIMUM ELEVATION INCREASE - SEIS ROOSEVELT, WASHINGTON			FIGURE NO. 9
VISUAL IMPACT VIEWPOINT LOCATIONS			PROJECT NO. AU20.1209.00
DATE OF ISSUE:	11/19/2021	DRAWN BY:	CRP
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Appendix A

Supplemental Information

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Appendix A.2 - Pipe Strength Calculations

Appendix A.3 - Aerial and Viewsheds for the No Action and Proposed Action
Alternatives

Appendix A.1

Slope Stability Analysis

Slope Stability Report Maximum Elevation Increase

Roosevelt Regional Landfill
Klickitat County, Washington

Submitted to:

Regional Disposal Company
500 Roosevelt Grade Road
PO Box 338
Roosevelt, Washington 99356

Prepared by:

Geo-Logic
ASSOCIATES

803 SW Industrial Way, Suite 211
Bend, Oregon 97702
www.geo-logic.com
Project #AU20.1209.00

November 2021

Certification

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GEO-LOGIC ASSOCIATES



Aaron Ogorzalek, PE
Senior Engineer
Geo-Logic Associates
803 SW Industrial Way, Suite 211
Bend, Oregon 97702

November 18, 2021

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Attachment 1 SLOPE/W Output

Attachment 2 Seismic Displacement Calculations

1. Introduction

1.1 Project Description

The Roosevelt Regional Landfill (RRL), owned and operated by Regional Disposal Company (RDC) is an active municipal solid waste (MSW) disposal facility located in Klickitat County approximately 5 miles north of Washington State Highway 14 and the town of Roosevelt, Washington. The RRL is located on a 2,129-acre site with a permitted landfill footprint of 915 acres. The RRL is constructed in individual units/cells, named MSW Areas 1, 2, 3, etc. Existing MSW Areas consist of MSW Area 1 through 22. The currently used footprint of the active landfill is approximately 405 acres. The RRL receives approximately 2.3 million tons of waste per year. The waste stream is reportedly comprised of approximately 60% MSW, 20% construction demolition and land-clearing (CDL) waste, and 20% "other" (mostly soil).

The RRL is in the process of amending its Conditional Use Permit (CUP) that would increase the maximum elevation of the landfill from 1,820 feet above mean sea level (MSL) to 2,050 feet MSL. A revised top-of-waste grading plan has been developed to support the CUP amendment request, which would increase the maximum waste depth from 120 feet to 350 feet in the northwest portion of the landfill footprint, and from 320 feet to 325 feet in the eastern portion of the landfill. The top deck would be graded at a 5% slope trending from the northwest to the southeast, and maximum side slope inclination would remain at 3:1 (horizontal:vertical). The top deck elevation and approximate 5:1 side slope over existing lined Areas 1A-1C would remain unchanged. The proposed grading plan is shown in Figure 1.

1.2 Purpose and Scope

The objective of this report is to present an assessment of the slope stability of the RRL associated with the proposed maximum elevation increase of the permitted top-of-waste grades of the landfill. The scope of work performed to meet this objective included:

- Review of the proposed waste grading plan and selection of representative cross sections for analysis
- Review of available data describing existing liner system configurations and identification of material properties for use in analyses

- Review of the seismic hazard evaluation for the landfill and site-specific response analysis (performed by Geo-Logic Associates, 2018)
- Completion of static and seismic stability analyses, and
- Preparation of this report summarizing the results of the analyses

The evaluations described below were focused on global stability of the landfill along the liner system for the proposed final buildout conditions of the landfill. The maximum slopes of the landfill would not change; therefore cover stability analysis was outside the scope of this evaluation. Subsurface investigation and laboratory testing were outside the scope of this study and were not performed. Because all material properties used for this analysis were assumed, shear strength testing during construction of future expansion areas should be performed to confirm that all materials used for construction will meet or exceed the material strengths assumed herein.

2. Design Criteria

For slope stability design of landfills, results are typically expressed by a factor of safety (FS) against failure. The state of practice for static stability of landfill slopes is to design for a FS equal to or greater than 1.5 for final slopes. Interim slopes are often designed with a lower minimum static FS criterion, such as 1.3. The slopes of the RRL that are being evaluated herein represent final buildout conditions of the landfill. Thus, a minimum static FS criterion of 1.5 was adopted for the current evaluation.

For seismic stability of landfill slopes, the state-of-practice approach is not to express a FS, but to calculate the amount of permanent displacement accumulated during a design seismic event. For lined landfills, a displacement threshold of no more than 6-12 inches is generally considered acceptable, and for unlined facilities and landfill covers that do not contain geosynthetic components, a threshold of up to 1 meter is considered acceptable (Seed and Bonaparte, 1992).

3. Method of Analysis

The slope stability of proposed slopes was evaluated using the computer program SLOPE/W (v. 11.1.2) to calculate the 2D safety factors for two critical cross sections using the Morgenstern-

Price (1965) limit equilibrium method. SLOPE/W is a 2D slope stability analysis program based on the limit equilibrium principles. It allows for evaluation of FS of a sliding mass based upon assumptions of rigid body behavior, shape of failure surface, and inclination of interslice forces within a failure surface. The FS against failure is defined as the ratio of total shear stress calculated along the critical failure surface to available shear strength along that same surface.

The calculations of FS of the slopes were performed for non-circular translational failure surfaces through the MSW and along the liner system. The surface optimization tool, as coded in SLOPE/W, was used. With the surface optimization tool, the lowest FS for a potential slip surface at the end of a standard limit-equilibrium search is iterated on a segment-wise basis to find potentially lower FS (and often non-circular) slip surfaces. Use of this procedure will always result in a FS that is as low or lower than if it had not been used (i.e. it is conservative). A phreatic water surface was not included in the analyses, as it is assumed that the leachate collection system will remain functional and a phreatic surface will not form above the liner system.

4. Conditions Analyzed

4.1 Cross Sectional Profiles

The global stability of the proposed landfill slopes was assessed with six two-dimensional (2D) cross sections through the proposed final waste fill slopes of the landfill that were judged to be critical. The cross sections were "cut" using Civil 3D from three-dimensional surfaces representing the landfill's as-built and future expansion subgrade plan and the proposed top-of-waste fill plan. The six cross sections are named A-A', B-B', C-C', D-D', E-E' and F-F.' The section locations, the proposed fill plan, subgrade plan, and existing site conditions are shown in Figures 1 and 2. The detailed cross sections are depicted in Figures 3 and 4.

4.2 Liner Systems

MSW Areas 1A, 1B, 1C, and 4-10 were constructed with a single composite bottom liner system with compacted clay as the soil barrier component and a single-side textured high density polyethylene (HDPE) geomembrane with the smooth side facing up in contact with an overlying cushion geotextile. Geosynthetic clay liner (GCL) replaced the compacted clay as the soil barrier

component of the bottom liner system beginning with MSW Area 11, and has continued to be used in subsequent MSW Area expansions.

The critical interface of the liner systems in MSW Areas 1A, 1B, 1C, and 4-10 was judged to be between the upper smooth surface of the HDPE liner and the overlying nonwoven geotextile. MSW Areas 10, 12, and 13 were constructed with double-sided textured liner for the first 600 feet from the exterior (eastern) perimeter inward, per the recommendation of Thiel (2002) for slope stability purposes, as depicted in the stability output in Attachment 1. The critical interface for these outer 600 feet was judged to be between the textured HDPE geomembrane and either the overlying nonwoven geotextile or the underlying nonwoven geotextile component of the GCL (MSW Areas 12 and 13). The interior portions of MSW Areas 10, 11, and 12 as well as MSW Areas 13-17 were constructed with single-sided textured HDPE with the smooth side up in contact with the overlying nonwoven geotextile, similar to MSW Areas 1A, 1B, 1C, and 4-9. MSW Area 18 introduced the landfill's first side slope liner where double-sided textured HDPE liner was used overlying the GCL on the side slopes, and single-sided textured HDPE with the smooth side up was used on the floor. Beginning with MSW Area 19, double-sided textured HDPE liner was used throughout the entire cell area (i.e., floor and side slopes). MSW Area 22 introduced a double-sided geocomposite drainage layer on the side slopes as an alternative to the cushion geotextile and the 1-foot thick gravel drainage layer overlying the HDPE geomembrane.

5. Material Properties

The material properties used in this evaluation are summarized in Table 1 and are based on assumed typical values that are consistent with past stability analyses at the site (Thiel 2000, 2001, 2002, and Geo-Logic Associates 2018). Interface strength testing has not been a requirement during past construction projects until recently with MSW Area 21, and was therefore not available for lined Areas prior to Area 21. The MSW Area 21 and 22 liner systems were modeled using shear-normal functions represented by the minimum measured shear stresses from construction conformance interface shear strength testing of the respective construction projects (see Figure 5).

The base grades of the landfill reportedly follow the top of a basalt surface that dips to the southeast at a slope of approximately 3%. Considering the desire to evaluate the effects of the liner system on stability, GLA assigned an infinite strength model to subgrade materials below the liner to force block failures along or above the landfill liner.

The material properties of the refuse were based on recent information published by Kavazanjian et al. (2013) for municipal solid waste.

Table 1
Summary of Material Properties

MSW Area	Clay Component	Critical Interface	Liner Strength	
			Phi (°)	C (psf)
MSW 1A, 1B, 1C (All Floor)	Compacted Clay	Smooth HDPE -to- NW Geotextile	9	0
MSW 4-9 (All Floor)	Compacted Clay	Smooth HDPE -to- NW Geotextile	9	0
MSW 10 ¹ (All Floor)	Compacted Clay	Smooth HDPE -to- NW Geotextile	9	0
MSW 11 (All Floor)	GCL	Smooth HDPE -to- NW Geotextile	9	0
MSW 12 ¹ (All Floor)	GCL	Smooth HDPE -to- NW Geotextile	9	0
MSW 13 ¹ (All Floor)	GCL	Smooth HDPE -to- NW Geotextile	9	0
MSW 14-18 (Floor)	GCL	Smooth HDPE -to- NW Geotextile	9	0
MSW 18 (Side Slope)	GCL	Textured HDPE -to- NW Geotextile or GCL	11	0
MSW 19-20 (Floor)	GCL	Textured HDPE -to- NW Geotextile or GCL	16	0
MSW 19-20 (Side Slope)	GCL	Textured HDPE -to- NW Geotextile or GCL	11	0
MSW 21-22 (Floor)	GCL	Textured HDPE -to- NW Geotextile or GCL	S-N Function ²	
MSW 22 (Side Slope)	GCL	Textured HDPE -to- Geocomposite or GCL	S-N Function ²	
Future Cell (Floor)	GCL	Texture HDPE -to- NW Geotextile or GCL	16	0
Future Cell (Side Slope)	GCL	Textured HDPE -to- Geocomposite or GCL	9	0

Notes:

- ¹ - Geomembrane is double textured for 600' from the east perimeter (toe), and single textured (smooth side up) on the interior of MSW Areas 10, 12 & 13. Double-textured HDPE -to- NW Geotextile interface was characterized with a friction angle of 16° and 0 psf cohesion after Thiel (2002).
- ² - Shear-Normal function using post-peak shear stresses based on construction conformance testing (see Figure 5).

6. Seismic Hazard

A probabilistic seismic hazard analysis update was performed for the site by Geo-Logic Associates (2018). Details of the seismic hazard analysis are described in Geo-Logic Associates (2018) and are summarized herein. The seismic parameters developed from the 2018 analysis were reviewed and are considered applicable to the slope stability evaluations described in this document (<https://earthquake.usgs.gov/hazards/interactive/>).

A USGS seismic hazard deaggregation analysis was performed for the design probabilistic event (10% probability of exceedance in 250 years, or 2% probability of exceedance in 50 years), which indicated a PGA of 0.19g. The mean of all contributing sources consists of a magnitude 6.35 earthquake approximately 34 km from the site. The major (i.e., modal) contributing source is a magnitude 5.5 earthquake approximately 11 km from the site. The nearest interface of the Cascadia Megathrust subduction earthquake (approximate magnitude 9) is reported at 259 km from the site and is therefore not considered a significant contributing source. The USGS probabilistic acceleration response spectrum is shown in the seismic displacement calculations in Attachment 2.

7. Results

Results of the slope stability analyses that incorporate the proposed waste grading plan are summarized in Table 2, and SLOPE/W output files are included in Attachment 1. The output from SLOPE/W shows the cross-section dimensions, the material properties, material transitions, and the locations of the critical failure surfaces with the lowest factors of safety. Seismic displacement calculations are included in Attachment 2.

Table 2
Summary of Stability Results

Cross Section	R/L	Condition Analyzed	Static FS _{min}	Seismic Yield, K _y	Bray Seismic Displacement (cm)
A-A'	Right	South East Slope, Area 1	1.58	0.09g	< 1
B-B'	Right	North Slope of West Wing, through Max Elevation	1.81	0.19g	< 1
	Left	South Slope of West Wing	1.90	0.21g	< 1
C-C'	Right	North East Slope, Area 17	1.56	0.10g	< 1
	Left	West Slope of West Wing, through Max Elevation	1.90	0.22g	< 1
D-D'	Right	East Slope, through Sump of Eastern Expansion Area	2.24	0.19g	< 1
E-E'	Right	North East Slope, Area 13	1.85	0.15g	< 1
	Left	South West Slope, Area 8	1.79	0.15g	< 1
F-F'	Right	East Slope, through Sump of South Wing	1.91	0.19g	< 1
	Left	West Slope of South Wing	2.30	0.26g	< 1

8. Conclusions and Recommendations

The results indicate a minimum static FS greater than 1.5 and estimated permanent seismic deformation less than 1 cm for the proposed waste slopes represented by the six cross sections evaluated. Given the range of conditions evaluated, the stability results were found to be acceptable relative to the design criteria presented in Section 2 of this report, the standards set forth in WAC 173-315, and generally accepted standard of practice for landfill slope stability. It is

therefore our recommendation that the proposed grading plan associated with the maximum elevation increase of the landfill be accepted with regard to slope stability.

The analyses presented herein are based largely on assumed parameters and on information gathered by others. The shear strengths for the specific materials that will be used for the construction of future expansions of the landfill should be verified by CQA testing during construction, and the acceptability of test results below those assumed herein must be verified by slope stability analyses based on test results.

9. Limitations

The data, analyses, results, and recommendations presented in this document pertain only to the Roosevelt Regional Landfill site in Klickitat County, Washington and assume that the conditions do not deviate substantially from those reported. If any variations or conditions are encountered that are materially inconsistent with those used in this document, or if the proposed development differs from that anticipated herein, GLA should be notified so that supplemental evaluations can be provided.

This document has not been prepared for use by parties or projects other than those named above. It may not contain sufficient information for other parties or other purposes. This document conforms to generally accepted civil and geoenvironmental engineering practice and makes no other warranties, either expressed or implied, as to the professional advice or data included.

10. References

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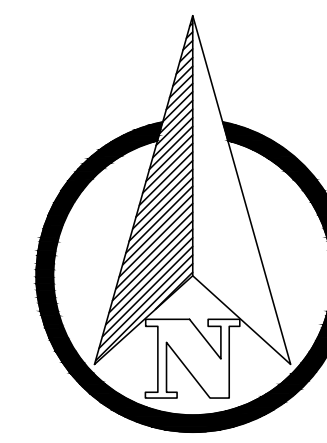
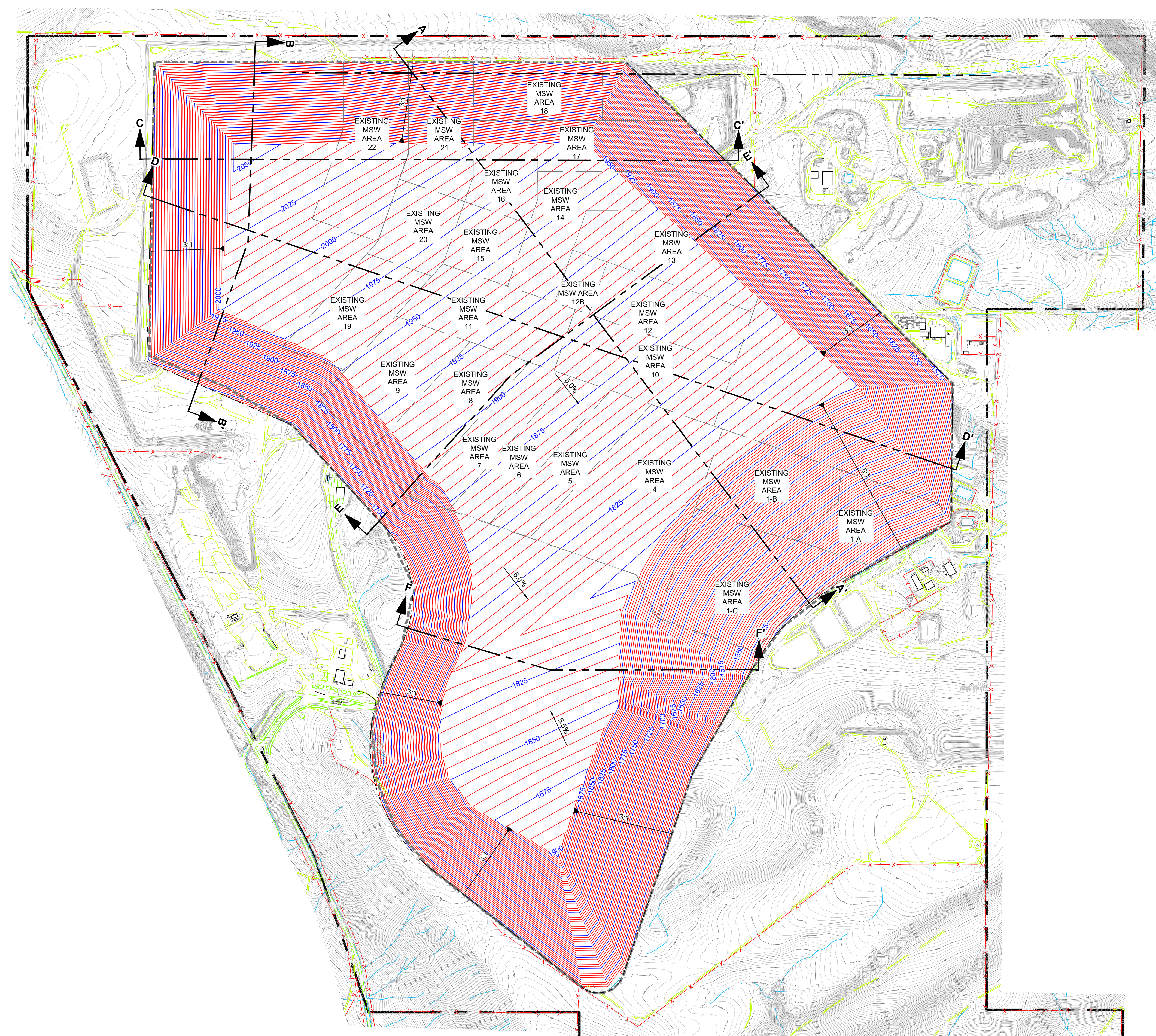
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Thiel Engineering, (2001), "Slope Stability Analysis, Roosevelt MSW Area 9, as Appendix 4-B3 in the 2004 Permit Reissuance Engineering Report, Roosevelt Regional Landfill, December 30, 2003.

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FIGURES

N:\ROOSEVELT\AU20.1209 VERTICAL EXPANSION\6. ENGINEERING\1. CIVIL\DRAWINGS\FIGURES\ISLOPE STABILITY - FIGURE 1.TOW.DWG November 18, 2021 - 8:28 AM BY: GLA USER



LEGEND

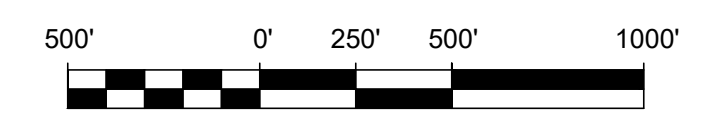
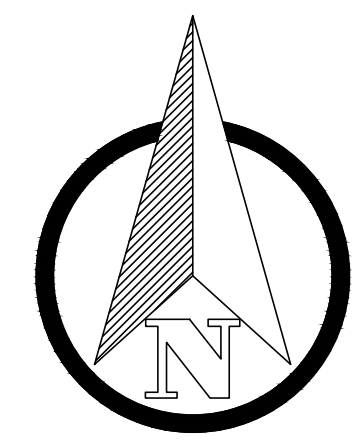
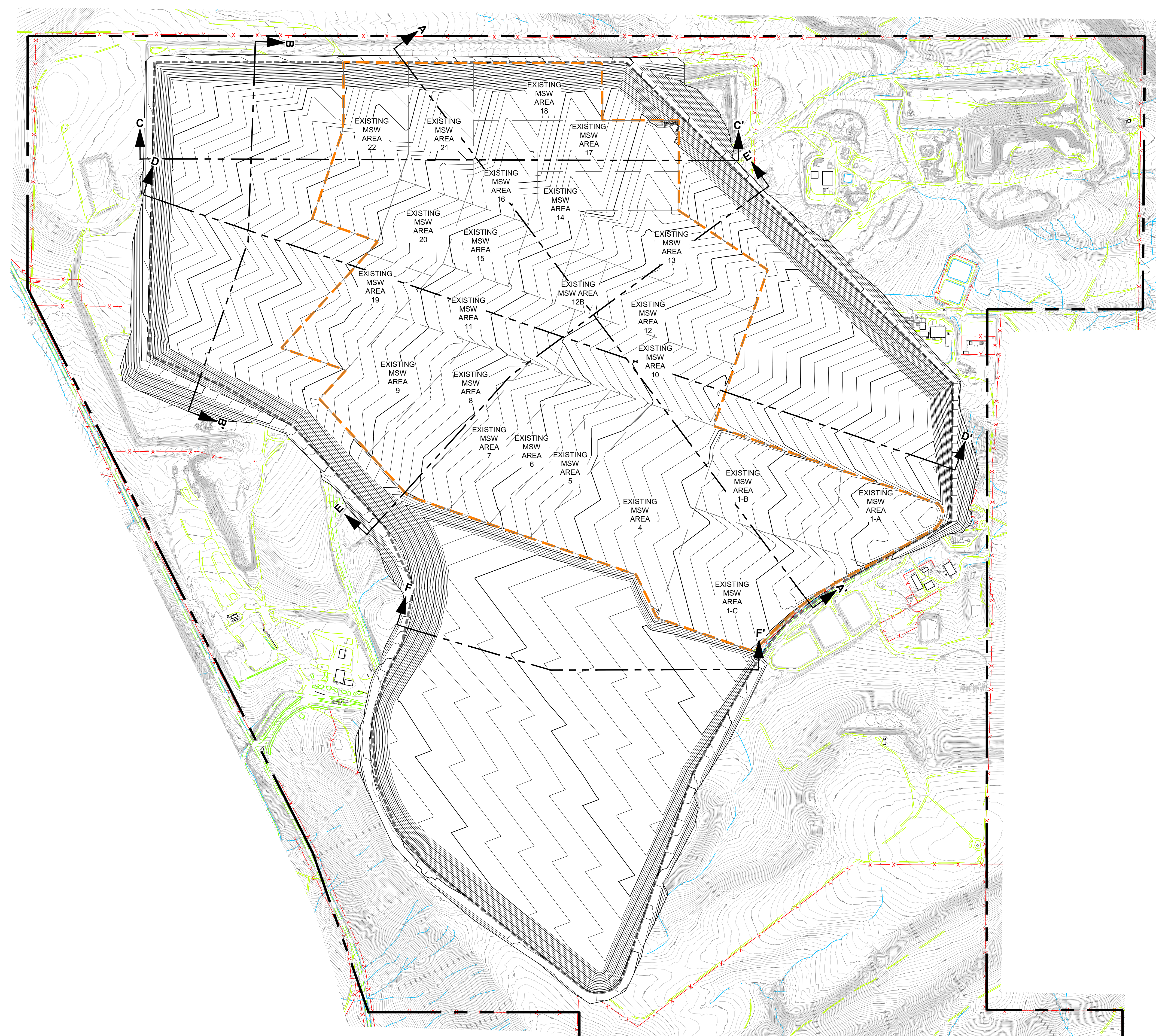
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- 1700 — EXISTING 2' CONTOUR⁽¹⁾
- 1700 — BOTTOM GRADING 10' CONTOUR
- 1700 — BOTTOM GRADING 2' CONTOUR
- x - x - x - EXISTING FENCE
- - - - EXISTING PAVED ROAD
- - - - EXISTING UNPAVED ROAD
- - - - EXISTING LINER LIMITS
- - - - EXISTING DRAINAGE
- - - - PROPERTY LINE
- - - - LIMITS OF MSW LANDFILL FOOTPRINT

NOTES
 1. AERIAL TOPOGRAPHY BASED ON MARCH 30, 2021 PERFORMED BY COOPER AERIAL SURVEY COMPANY.

ROOSEVELT REGIONAL LANDFILL SLOPE STABILITY REPORT ROOSEVELT, WASHINGTON TOP OF WASTE GRADING PLAN		FIGURE NO. 1 PROJECT NO. AU20.1209.00
DATE OF ISSUE:	11/19/2021	DRAWN BY: RDD
		APPROVED BY: SAH
803 SW Industrial Way, Suite 211, Bend, OR 97702 geo-logic.com 541.678.5733		

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N:\ROOSEVELT\AU20.1209 VERTICAL EXPANSION\6. ENGINEERING\1. CIVIL DRAWINGS\FIGURES\ISLOPE STABILITY - FIGURE 2.BASE.DWG November 18, 2021 - 8:45 AM BY: GLA USER



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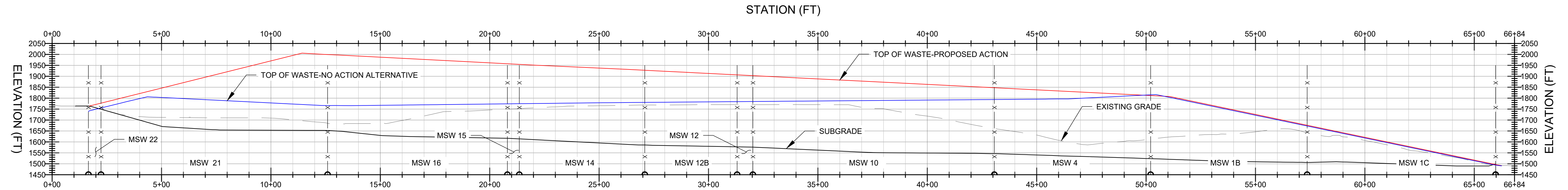
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- 1700 — EXISTING 2' CONTOUR⁽¹⁾
- 1700 — BOTTOM GRADING 25' CONTOUR
- 1700 — BOTTOM GRADING 5' CONTOUR
- x - x - x - EXISTING FENCE
- - - - EXISTING PAVED ROAD
- - - - EXISTING UNPAVED ROAD
- - - - EXISTING LINER LIMITS
- - - - EXISTING DRAINAGE
- - - - PROPERTY LINE
- - - - LIMITS OF MSW LANDFILL FOOTPRINT
- - - - USED LANDFILL FOOTPRINT

NOTES
 1. AERIAL TOPOGRAPHY BASED ON MARCH 30, 2021 PERFORMED BY COOPER AERIAL SURVEY COMPANY.

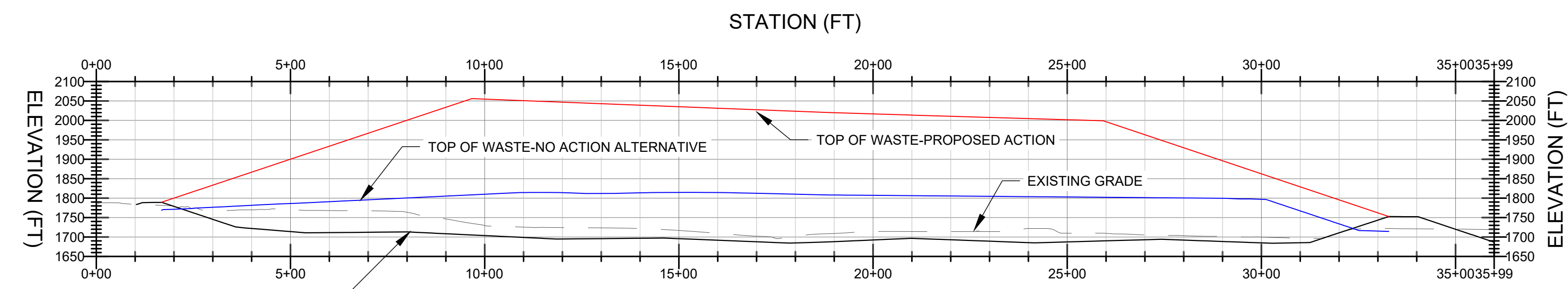
ROOSEVELT REGIONAL LANDFILL			FIGURE NO. 2
SLOPE STABILITY REPORT			
ROOSEVELT, WASHINGTON			
BASE GRADING PLAN			PROJECT NO. AU20.1209.00
DATE OF ISSUE:	11/19/2021	DRAWN BY:	
		APPROVED BY:	SAH
803 SW Industrial Way, Suite 211, Bend, OR 97702 geo-logic.com 541.678.5733			

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N:\ROOSEVELT\AU20.1209 VERTICAL EXPANSION\6. ENGINEERING\1. CIVIL DRAWINGS\FIGURES\ISLOPE STABILITY - FIGURE 3 & 4 SECTIONS.DWG November 17, 2021 - 10:15 AM BY: GLA USER

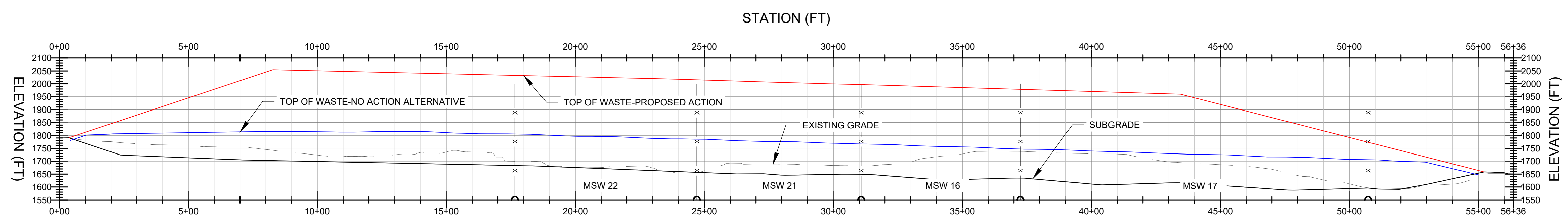


SECTION A-A'
 HORIZ. SCALE: 1" = 250'
 VERT. SCALE: 1" = 125'



SECTION B-B'
 HORIZ. SCALE: 1" = 250'
 VERT. SCALE: 1" = 125'

- LEGEND**
- TOP OF WASTE - NO ACTION ALTERNATIVE
 - TOP OF WASTE - PROPOSED ACTION
 - EXISTING GRADE
 - SUBGRADE
 - x — CELL LIMIT

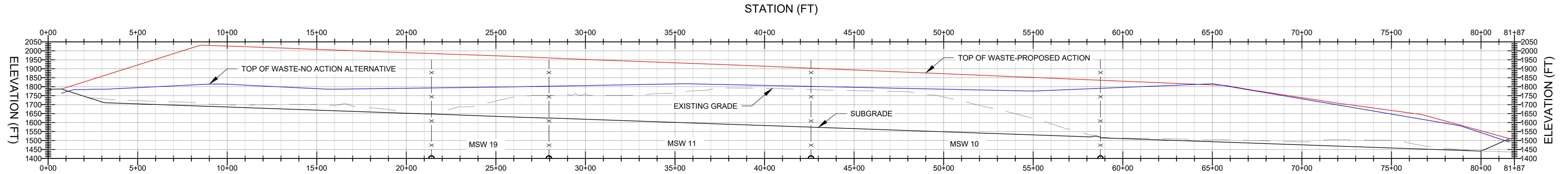


SECTION C-C'
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 VERT. SCALE: 1" = 125'

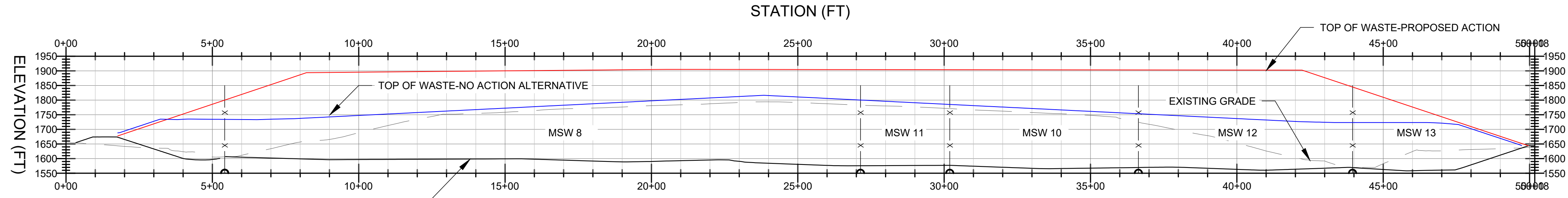
ROOSEVELT REGIONAL LANDFILL			FIGURE NO. 3
SLOPE STABILITY REPORT			
ROOSEVELT, WASHINGTON			PROJECT NO. AU20.1209.00
CROSS SECTIONS			
DATE OF ISSUE:	11/19/2021	DRAWN BY:	RDD
APPROVED BY:		SAH	
803 SW Industrial Way, Suite 211, Bend, OR 97702 geo-logic.com 541.678.5733			

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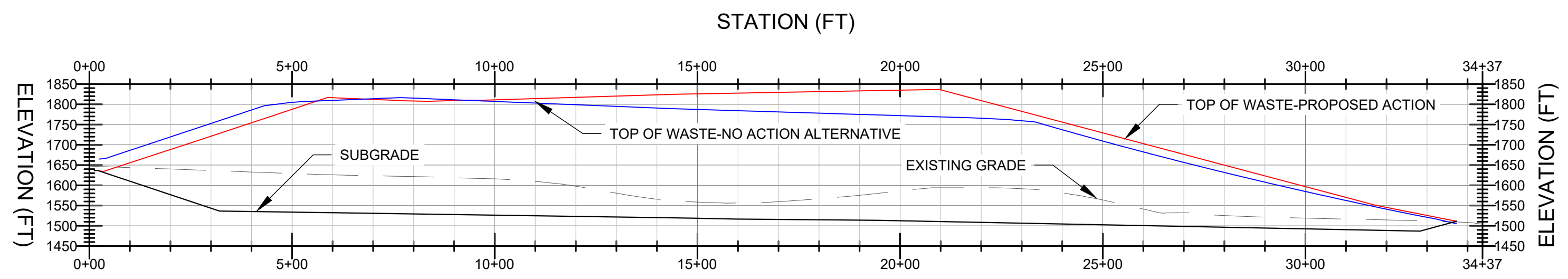
N:\ROOSEVELT\AU20.1209 VERTICAL EXPANSION\6. ENGINEERING\1. CIVIL DRAWINGS\FIGURES\ISLOPE STABILITY - FIGURE 3 & 4 SECTIONS.DWG November 17, 2021 - 10:15 AM BY: GLA USER



STATION (FT)
SECTION D-D'
 HORIZ. SCALE: 1" = 300'
 VERT. SCALE: 1" = 150'



STATION (FT)
SECTION E-E'
 HORIZ. SCALE: 1" = 250'
 VERT. SCALE: 1" = 125'



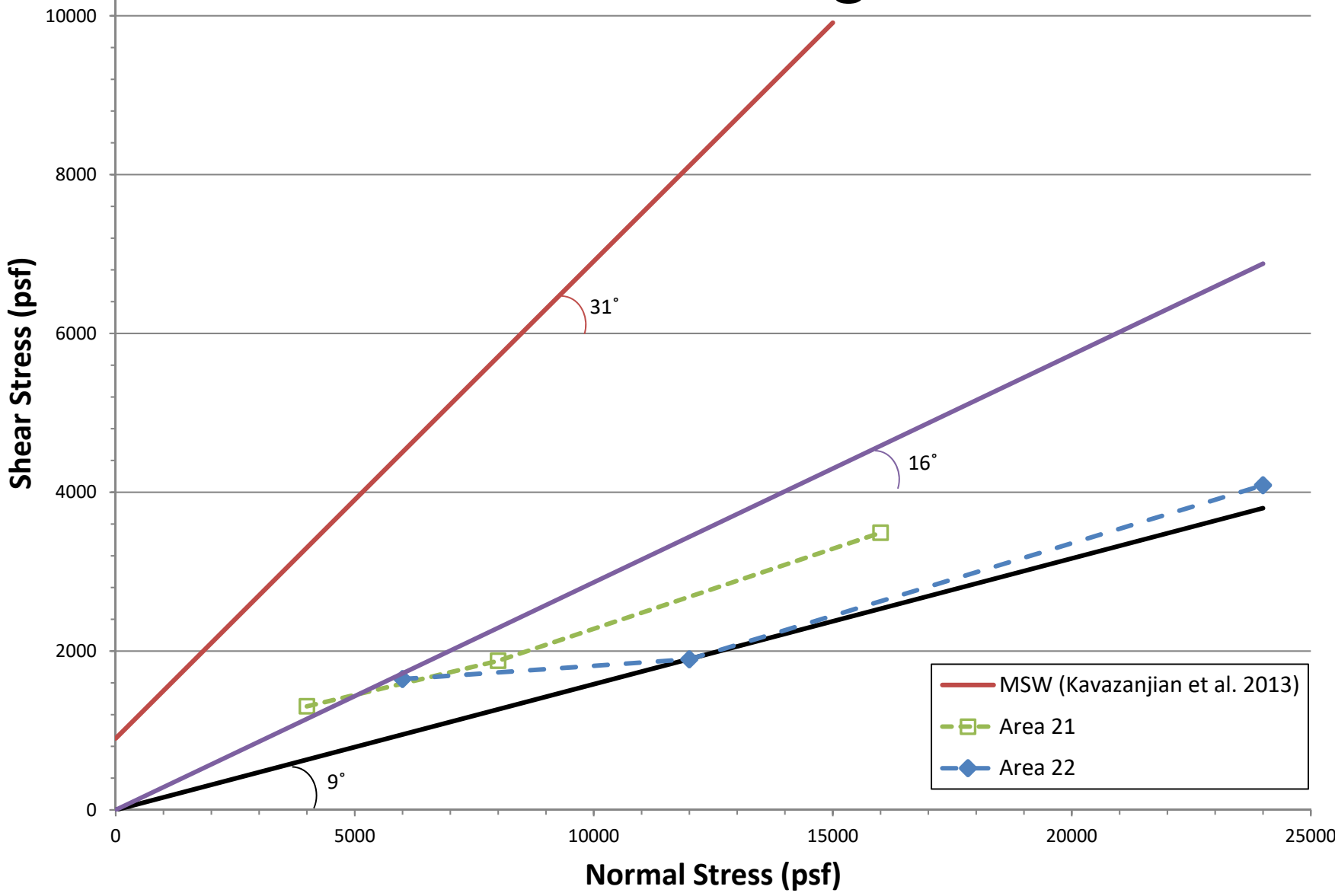
STATION (FT)
SECTION F-F'
 HORIZ. SCALE: 1" = 250'
 VERT. SCALE: 1" = 125'

- LEGEND**
- — — — — EXISTING GRADE
 - — — — — TOP OF WASTE - NO ACTION ALTERNATIVE
 - — — — — TOP OF WASTE - PROPOSED ACTION
 - — — — — SUBGRADE
 - x — x — CELL LIMIT

ROOSEVELT REGIONAL LANDFILL		FIGURE NO.
SLOPE STABILITY REPORT		4
ROOSEVELT, WASHINGTON		PROJECT NO.
CROSS SECTIONS		AU20.1209.00
DATE OF ISSUE:	11/19/2021	DRAWN BY: RDD
		APPROVED BY: SAH
<p>803 SW Industrial Way, Suite 211, Bend, OR 97702 geo-logic.com 541.678.5733</p>		

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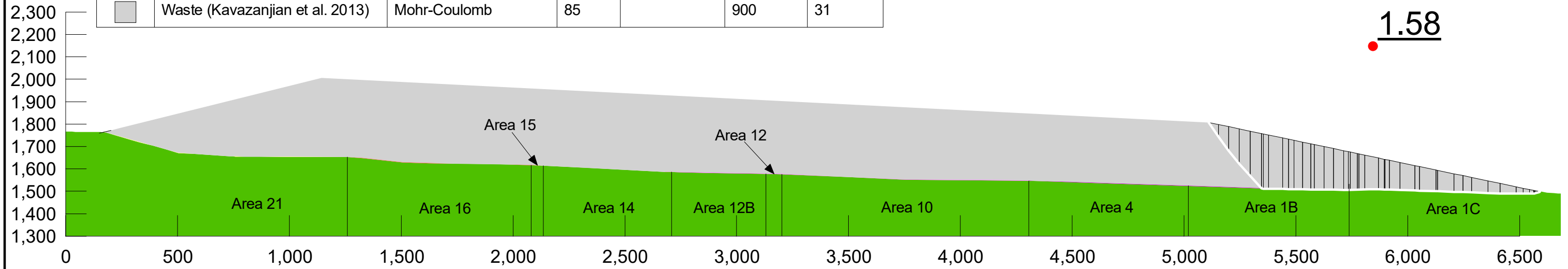
FIGURE 5 - Shear Strength Functions



ATTACHMENT 1
SLOPE/W OUTPUT

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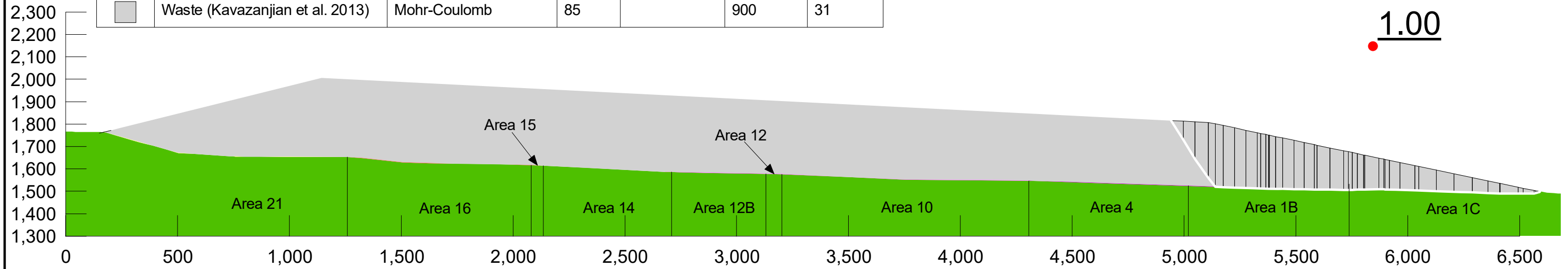
Color	Name	Material Model	Unit Weight (pcf)	Strength Function	Effective Cohesion (psf)	Effective Friction Angle (°)
■	Liner_Area_1-9 Floor (Smooth HDPE-to-Geotextile)	Mohr-Coulomb	100		0	9
■	Liner_Area 10-13 Interior Floor (Smooth HDPE-to-Geotextile)	Mohr-Coulomb	100		0	9
■	Liner_Area 14-18 Floor (Smooth HDPE-to-Geotextile)	Mohr-Coulomb	100		0	9
■	Liner_Area 21	Shear/Normal Fn.	100	Area 21 Conformance Testing		
■	Subgrade	Bedrock (Impenetrable)				
■	Waste (Kavazanjian et al. 2013)	Mohr-Coulomb	85		900	31



Roosevelt Regional Landfill Description: Section A-A'	
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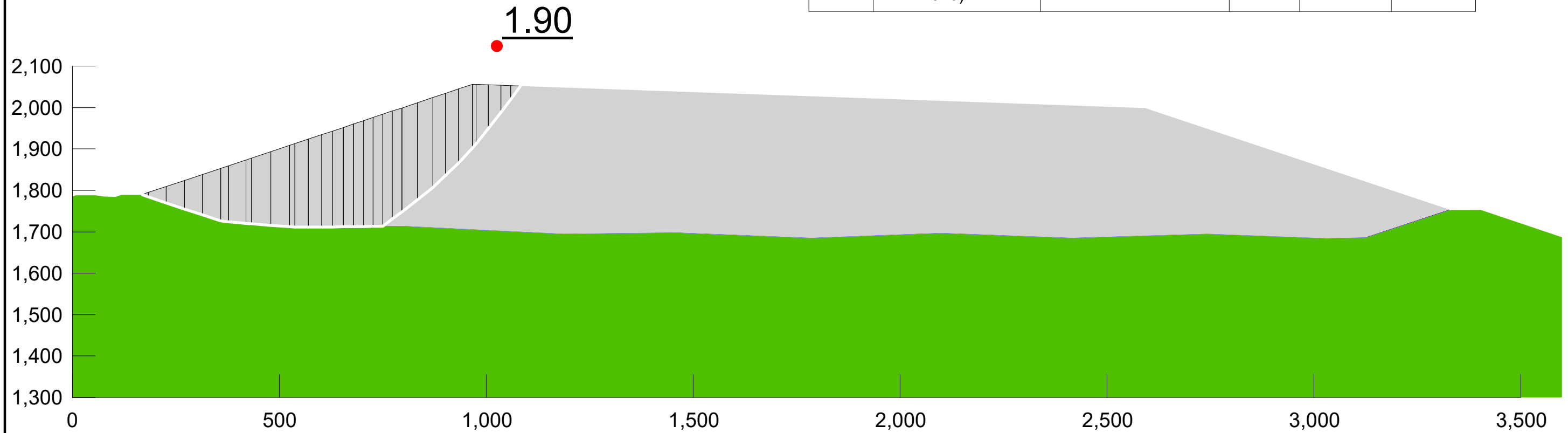
Horz Seismic Coef.: 0.087

Color	Name	Material Model	Unit Weight (pcf)	Strength Function	Effective Cohesion (psf)	Effective Friction Angle (°)
■	Liner_Area_1-9 Floor (Smooth HDPE-to-Geotextile)	Mohr-Coulomb	100		0	9
■	Liner_Area 10-13 Interior Floor (Smooth HDPE-to-Geotextile)	Mohr-Coulomb	100		0	9
■	Liner_Area 14-18 Floor (Smooth HDPE-to-Geotextile)	Mohr-Coulomb	100		0	9
■	Liner_Area 21	Shear/Normal Fn.	100	Area 21 Conformance Testing		
■	Subgrade	Bedrock (Impenetrable)				
■	Waste (Kavazanjian et al. 2013)	Mohr-Coulomb	85		900	31



Horz Seismic Coef.: 0

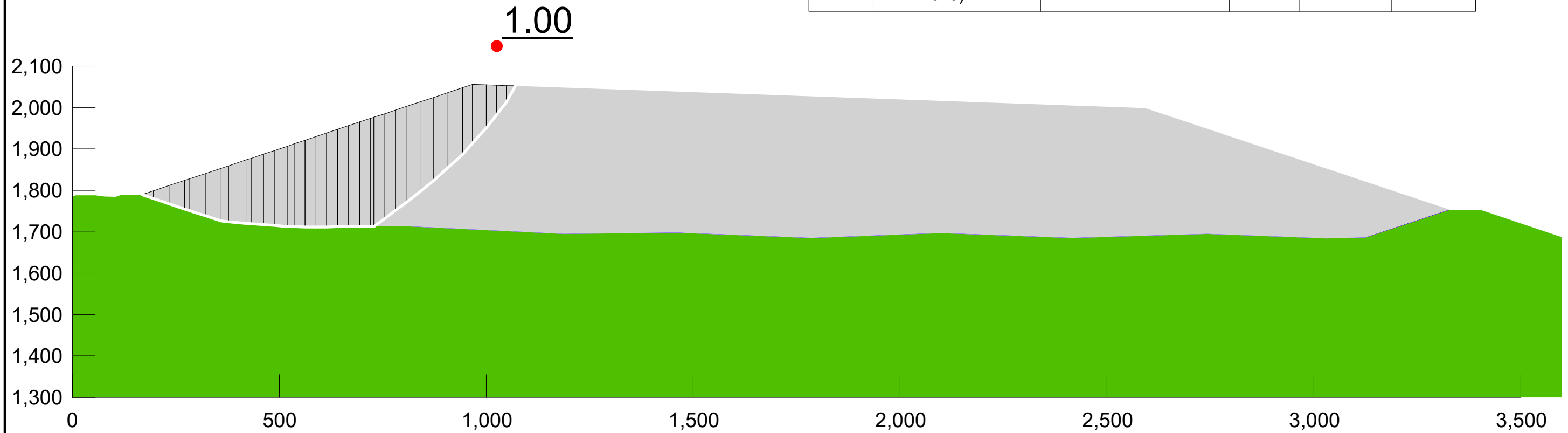
Color	Name	Material Model	Unit Weight (pcf)	Effective Cohesion (psf)	Effective Friction Angle (°)
Light Blue	Liner_Future Cell Floor	Mohr-Coulomb	100	0	16
Dark Blue	Liner_Future Cell Side Slope	Mohr-Coulomb	100	0	9
Green	Subgrade	Bedrock (Impenetrable)			
Grey	Waste (Kavazanjian et al. 2013)	Mohr-Coulomb	85	900	31



Roosevelt Regional Landfill Description: Section B-B'	
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11/15/2021	1:3,000

Horz Seismic Coef.: 0.21

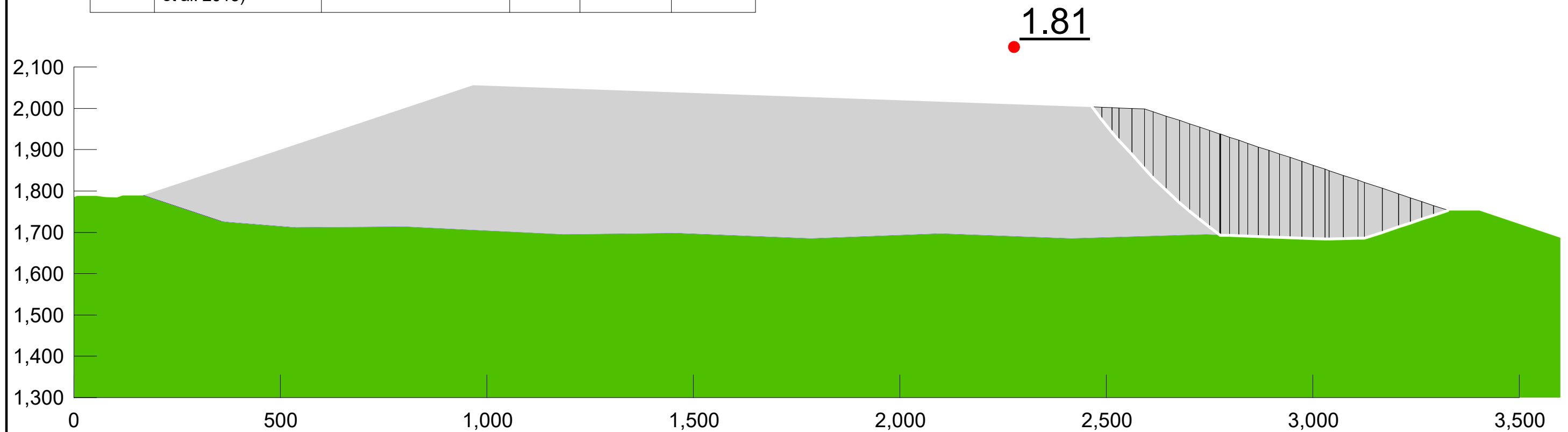
Color	Name	Material Model	Unit Weight (pcf)	Effective Cohesion (psf)	Effective Friction Angle (°)
Light Blue	Liner_Future Cell Floor	Mohr-Coulomb	100	0	16
Dark Blue	Liner_Future Cell Side Slope	Mohr-Coulomb	100	0	9
Green	Subgrade	Bedrock (Impenetrable)			
Grey	Waste (Kavazanjian et al. 2013)	Mohr-Coulomb	85	900	31



Roosevelt Regional Landfill Description: Section B-B'	
Roosevelt_Vertical Exp._Section B-B'_(Left)_01_EQ.gsz	
11/15/2021	1:3,000

Horz Seismic Coef.: 0

Color	Name	Material Model	Unit Weight (pcf)	Effective Cohesion (psf)	Effective Friction Angle (°)
Light Blue	Liner_Future Cell Floor	Mohr-Coulomb	100	0	16
Dark Blue	Liner_Future Cell Side Slope	Mohr-Coulomb	100	0	9
Green	Subgrade	Bedrock (Impenetrable)			
Grey	Waste (Kavazanjian et al. 2013)	Mohr-Coulomb	85	900	31



Roosevelt Regional Landfill Description: Section B-B'

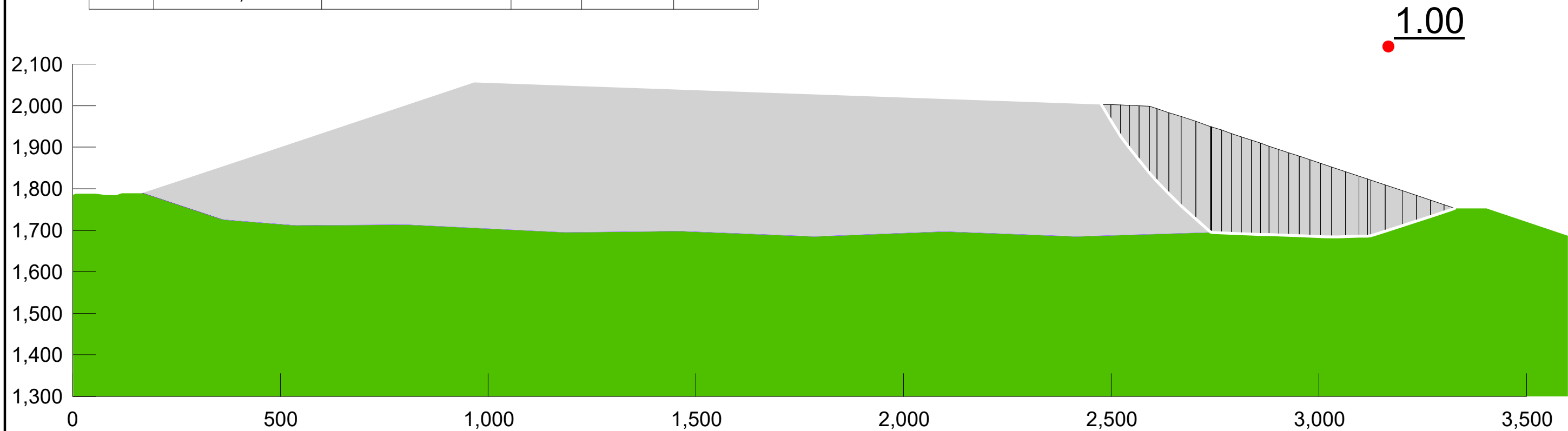
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11/15/2021

1:3,000

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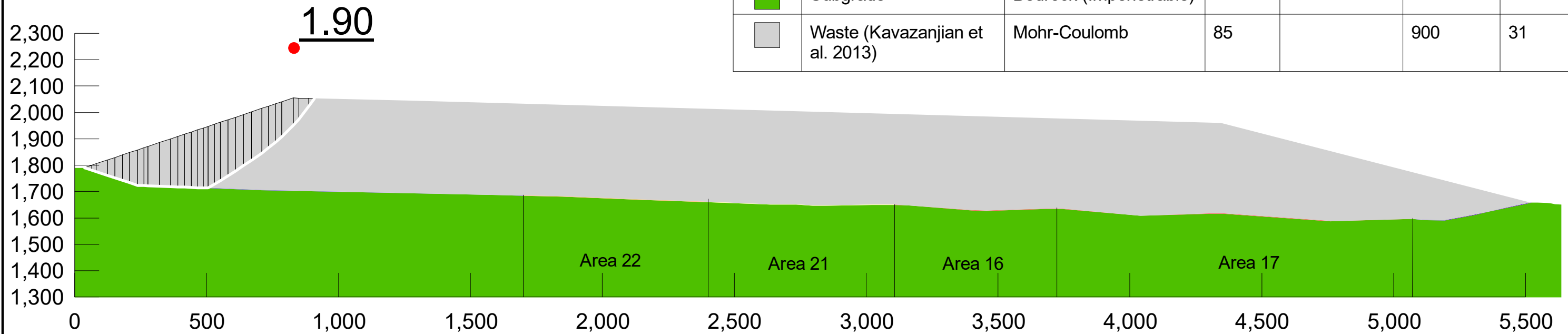
Color	Name	Material Model	Unit Weight (pcf)	Effective Cohesion (psf)	Effective Friction Angle (°)
Light Blue	Liner_Future Cell Floor	Mohr-Coulomb	100	0	16
Dark Blue	Liner_Future Cell Side Slope	Mohr-Coulomb	100	0	9
Green	Subgrade	Bedrock (Impenetrable)			
Grey	Waste (Kavazanjian et al. 2013)	Mohr-Coulomb	85	900	31



Roosevelt Regional Landfill Description: Section B-B'	
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11/15/2021	1:3,000

Horz Seismic Coef.: 0

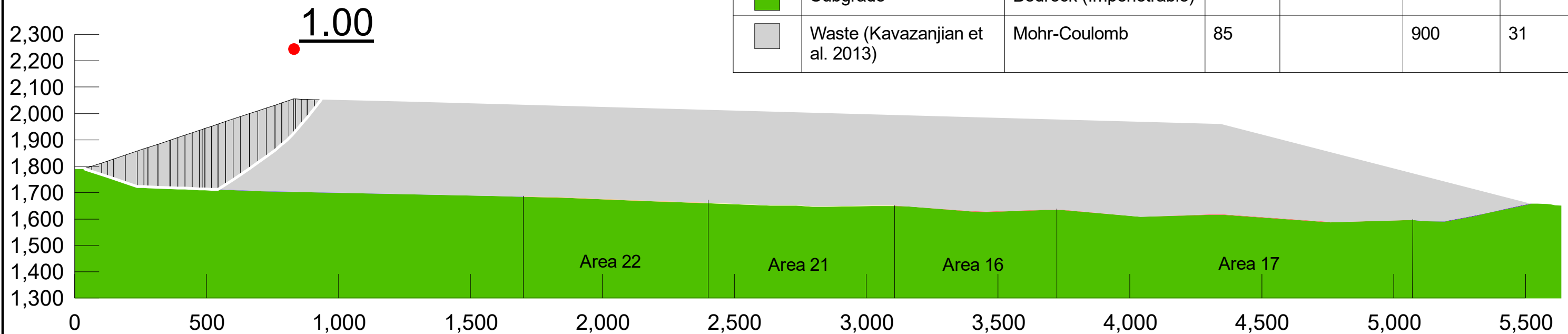
Color	Name	Material Model	Unit Weight (pcf)	Strength Function	Effective Cohesion (psf)	Effective Friction Angle (°)
Red	Liner_Area 14-18 Floor (Smooth HDPE-to-Geotextile)	Mohr-Coulomb	100		0	9
Yellow	Liner_Area 21	Shear/Normal Fn.	100	Area 21 Conformance Testing		
Orange	Liner_Area 22	Shear/Normal Fn.	100	Area 22 Conformance Testing		
Light Blue	Liner_Future Cell Floor	Mohr-Coulomb	100		0	16
Dark Blue	Liner_Future Cell Side Slope	Mohr-Coulomb	100		0	9
Green	Subgrade	Bedrock (Impenetrable)				
Grey	Waste (Kavazanjian et al. 2013)	Mohr-Coulomb	85		900	31



Roosevelt Regional Landfill Description: Section C-C'	
Roosevelt_Vertical Exp._Section C-C'_(Left)_01.gsz	
11/15/2021	1:4,600

Horz Seismic Coef.: 0.22

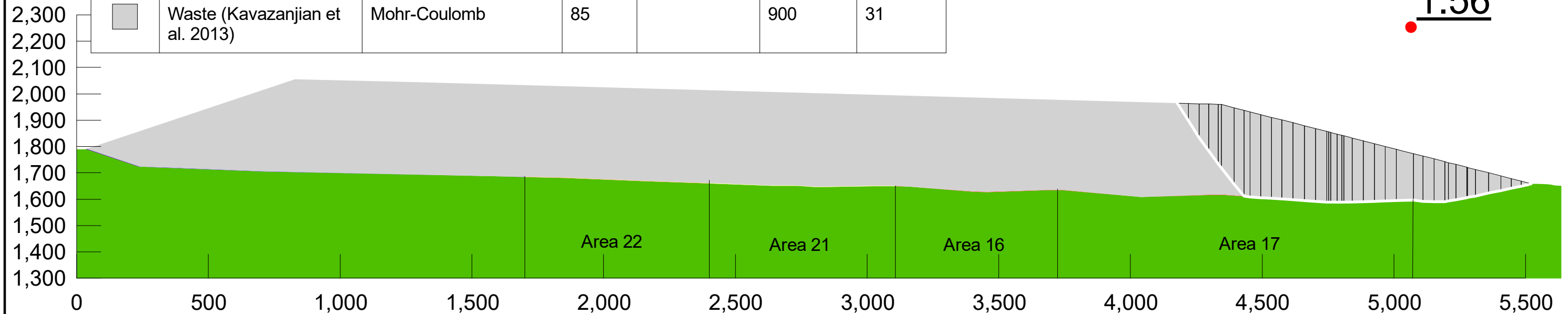
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Red	Liner_Area 14-18 Floor (Smooth HDPE-to-Geotextile)	Mohr-Coulomb	100		0	9
Yellow	Liner_Area 21	Shear/Normal Fn.	100	Area 21 Conformance Testing		
Orange	Liner_Area 22	Shear/Normal Fn.	100	Area 22 Conformance Testing		
Light Blue	Liner_Future Cell Floor	Mohr-Coulomb	100		0	16
Dark Blue	Liner_Future Cell Side Slope	Mohr-Coulomb	100		0	9
Green	Subgrade	Bedrock (Impenetrable)				
Grey	Waste (Kavazanjian et al. 2013)	Mohr-Coulomb	85		900	31



Roosevelt Regional Landfill Description: Section C-C'	
Roosevelt_Vertical Exp._Section C-C'_(Left)_01_EQ.gsz	
11/15/2021	1:4,600

Horz Seismic Coef.: 0

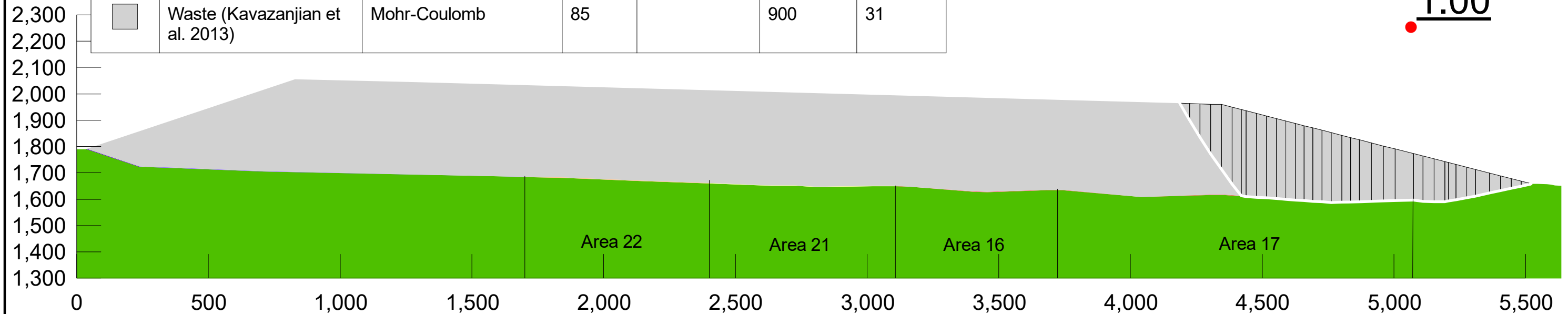
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Red	Liner_Area 14-18 Floor (Smooth HDPE-to-Geotextile)	Mohr-Coulomb	100		0	9
Yellow	Liner_Area 21	Shear/Normal Fn.	100	Area 21 Conformance Testing		
Orange	Liner_Area 22	Shear/Normal Fn.	100	Area 22 Conformance Testing		
Light Blue	Liner_Future Cell Floor	Mohr-Coulomb	100		0	16
Dark Blue	Liner_Future Cell Side Slope	Mohr-Coulomb	100		0	9
Green	Subgrade	Bedrock (Impenetrable)				
Grey	Waste (Kavazanjian et al. 2013)	Mohr-Coulomb	85		900	31



Roosevelt Regional Landfill Description: Section C-C'	
Roosevelt_Vertical Exp._Section C-C'_(Right)_01.gsz	
11/15/2021	1:4,600

Horz Seismic Coef.: 0.095

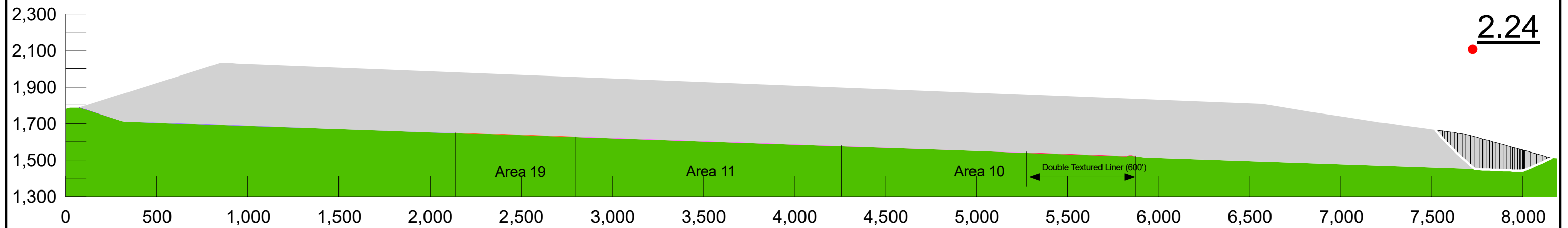
Color	Name	Material Model	Unit Weight (pcf)	Strength Function	Effective Cohesion (psf)	Effective Friction Angle (°)
Red	Liner_Area 14-18 Floor (Smooth HDPE-to-Geotextile)	Mohr-Coulomb	100		0	9
Yellow	Liner_Area 21	Shear/Normal Fn.	100	Area 21 Conformance Testing		
Orange	Liner_Area 22	Shear/Normal Fn.	100	Area 22 Conformance Testing		
Light Blue	Liner_Future Cell Floor	Mohr-Coulomb	100		0	16
Dark Blue	Liner_Future Cell Side Slope	Mohr-Coulomb	100		0	9
Green	Subgrade	Bedrock (Impenetrable)				
Grey	Waste (Kavazanjian et al. 2013)	Mohr-Coulomb	85		900	31



Roosevelt Regional Landfill Description: Section C-C'
Roosevelt_Vertical Exp._Section C-C'_(Right)_01_EQ.gsz
11/15/2021 1:4,600

Horz Seismic Coef.: 0

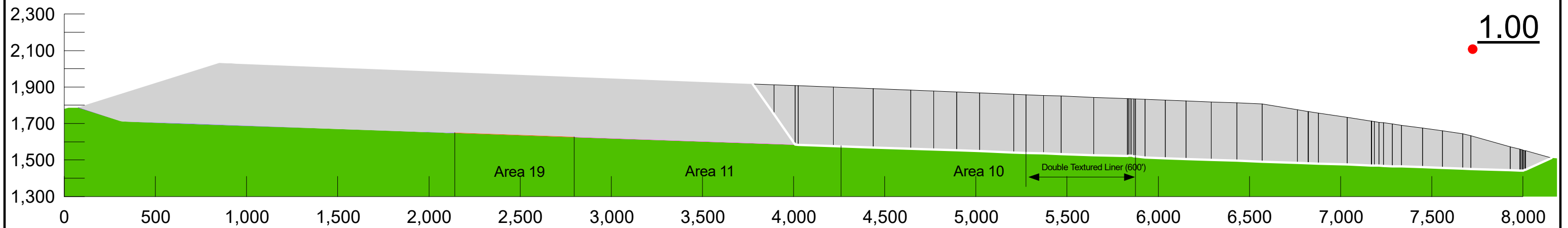
Color	Name	Material Model	Unit Weight (pcf)	Effective Cohesion (psf)	Effective Friction Angle (°)
Red	Liner_Area 10-13 Exterior Floor Liner (Textured HDPE-to-Geotextile)	Mohr-Coulomb	100	0	16
Pink	Liner_Area 10-13 Interior Floor (Smooth HDPE-to-Geotextile)	Mohr-Coulomb	100	0	9
Orange	Liner_Area 19-20 Floor	Mohr-Coulomb	100	0	16
Light Blue	Liner_Future Cell Floor	Mohr-Coulomb	100	0	16
Dark Blue	Liner_Future Cell Side Slope	Mohr-Coulomb	100	0	9
Green	Subgrade	Bedrock (Impenetrable)			
Grey	Waste (Kavazanjian et al. 2013)	Mohr-Coulomb	85	900	31



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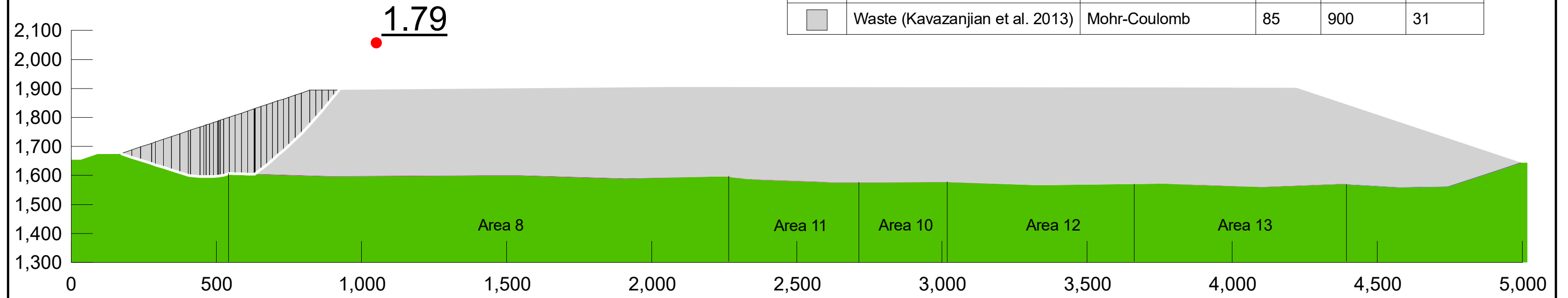
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Red	Liner_Area 10-13 Exterior Floor Liner (Textured HDPE-to-Geotextile)	Mohr-Coulomb	100	0	16
Pink	Liner_Area 10-13 Interior Floor (Smooth HDPE-to-Geotextile)	Mohr-Coulomb	100	0	9
Orange	Liner_Area 19-20 Floor	Mohr-Coulomb	100	0	16
Light Blue	Liner_Future Cell Floor	Mohr-Coulomb	100	0	16
Dark Blue	Liner_Future Cell Side Slope	Mohr-Coulomb	100	0	9
Green	Subgrade	Bedrock (Impenetrable)			
Grey	Waste (Kavazanjian et al. 2013)	Mohr-Coulomb	85	900	31



Roosevelt Regional Landfill Description: Section D-D'	
Roosevelt_Vertical Exp._Section D-D'_01_EQ.gsz	
11/15/2021	1:6,400

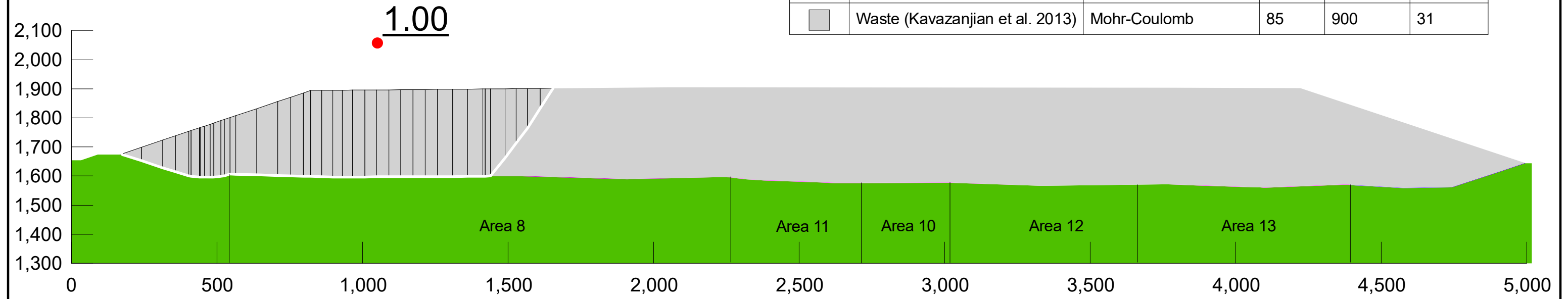
Horz Seismic Coef.: 0



Color	Name	Material Model	Unit Weight (pcf)	Effective Cohesion (psf)	Effective Friction Angle (°)
■	Liner_Area _1-9 Floor (Smooth HDPE-to-Geotextile)	Mohr-Coulomb	100	0	9
■	Liner_Area 10-13 Interior Floor (Smooth HDPE-to-Geotextile)	Mohr-Coulomb	100	0	9
■	Liner_Future Cell Floor	Mohr-Coulomb	100	0	16
■	Liner_Future Cell Side Slope	Mohr-Coulomb	100	0	9
■	Subgrade	Bedrock (Impenetrable)			
■	Waste (Kavazanjan et al. 2013)	Mohr-Coulomb	85	900	31

Roosevelt Regional Landfill Description: Section E-E'	
Roosevelt_Vertical Exp._Section E-E'_(Left)_01.gsz	
11/16/2021	1:4,000

Horz Seismic Coef.: 0.152

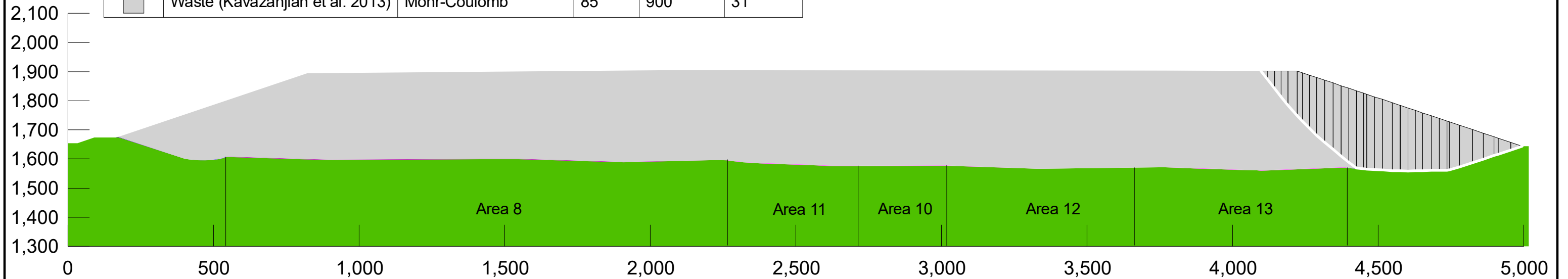


Color	Name	Material Model	Unit Weight (pcf)	Effective Cohesion (psf)	Effective Friction Angle (°)
■	Liner_Area _1-9 Floor (Smooth HDPE-to-Geotextile)	Mohr-Coulomb	100	0	9
■	Liner_Area 10-13 Interior Floor (Smooth HDPE-to-Geotextile)	Mohr-Coulomb	100	0	9
■	Liner_Future Cell Floor	Mohr-Coulomb	100	0	16
■	Liner_Future Cell Side Slope	Mohr-Coulomb	100	0	9
■	Subgrade	Bedrock (Impenetrable)			
■	Waste (Kavazanjian et al. 2013)	Mohr-Coulomb	85	900	31

Roosevelt Regional Landfill Description: Section E-E'	
Roosevelt_Vertical Exp._Section E-E'_(Left)_01_EQ.gsz	
11/16/2021	1:4,000

Horz Seismic Coef.: 0

Color	Name	Material Model	Unit Weight (pcf)	Effective Cohesion (psf)	Effective Friction Angle (°)
■	Liner_Area_1-9 Floor (Smooth HDPE-to-Geotextile)	Mohr-Coulomb	100	0	9
■	Liner_Area 10-13 Interior Floor (Smooth HDPE-to-Geotextile)	Mohr-Coulomb	100	0	9
■	Liner_Future Cell Floor	Mohr-Coulomb	100	0	16
■	Liner_Future Cell Side Slope	Mohr-Coulomb	100	0	9
■	Subgrade	Bedrock (Impenetrable)			
■	Waste (Kavazanjian et al. 2013)	Mohr-Coulomb	85	900	31

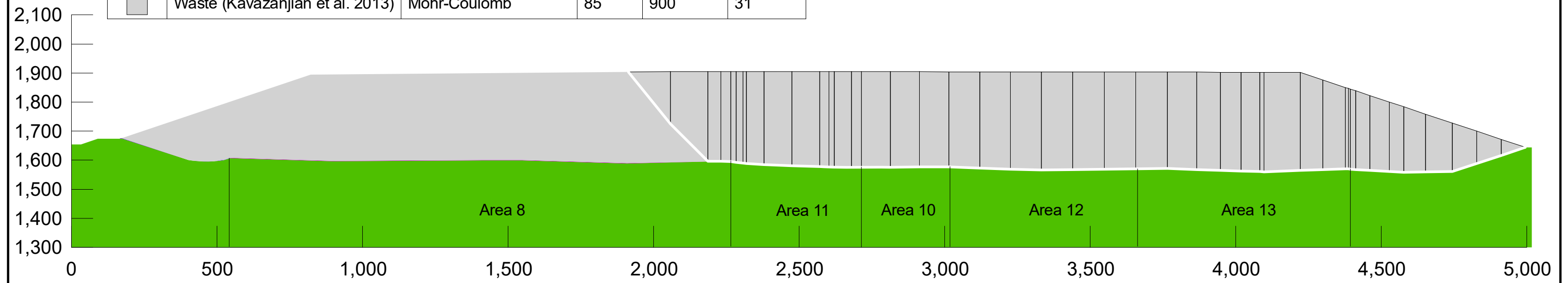


1.85

Roosevelt Regional Landfill Description: Section E-E'
Roosevelt_Vertical Exp._Section E-E'_(Right)_01.gsz
11/16/2021 1:4,000

Horz Seismic Coef.: 0.15

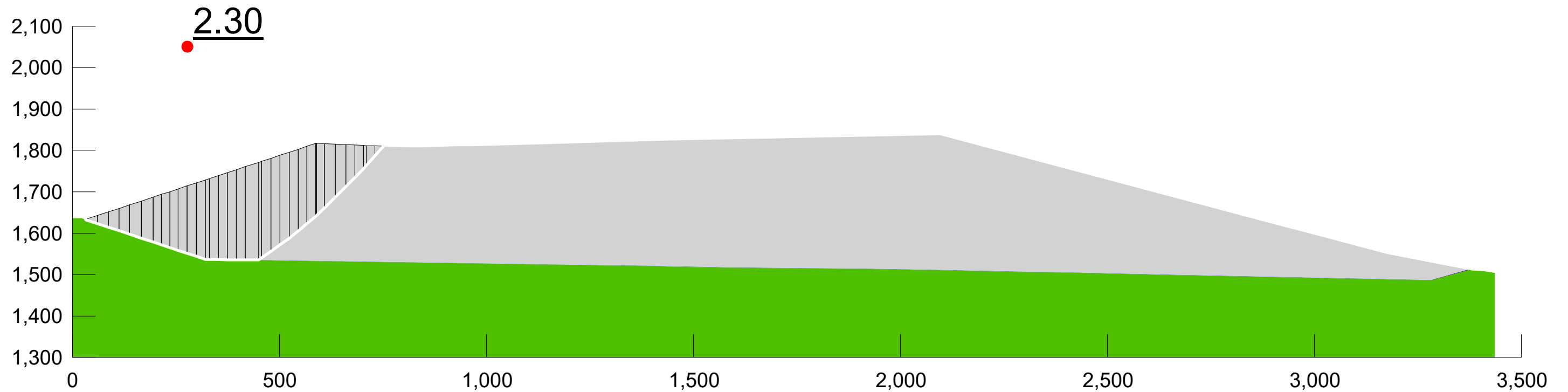
Color	Name	Material Model	Unit Weight (pcf)	Effective Cohesion (psf)	Effective Friction Angle (°)
■	Liner_Area_1-9 Floor (Smooth HDPE-to-Geotextile)	Mohr-Coulomb	100	0	9
■	Liner_Area 10-13 Interior Floor (Smooth HDPE-to-Geotextile)	Mohr-Coulomb	100	0	9
■	Liner_Future Cell Floor	Mohr-Coulomb	100	0	16
■	Liner_Future Cell Side Slope	Mohr-Coulomb	100	0	9
■	Subgrade	Bedrock (Impenetrable)			
■	Waste (Kavazanjian et al. 2013)	Mohr-Coulomb	85	900	31



Roosevelt Regional Landfill Description: Section E-E'	
Roosevelt_Vertical Exp._Section E-E'_(Right)_01_EQ.gsz	
11/16/2021	1:4,000

Horz Seismic Coef.: 0

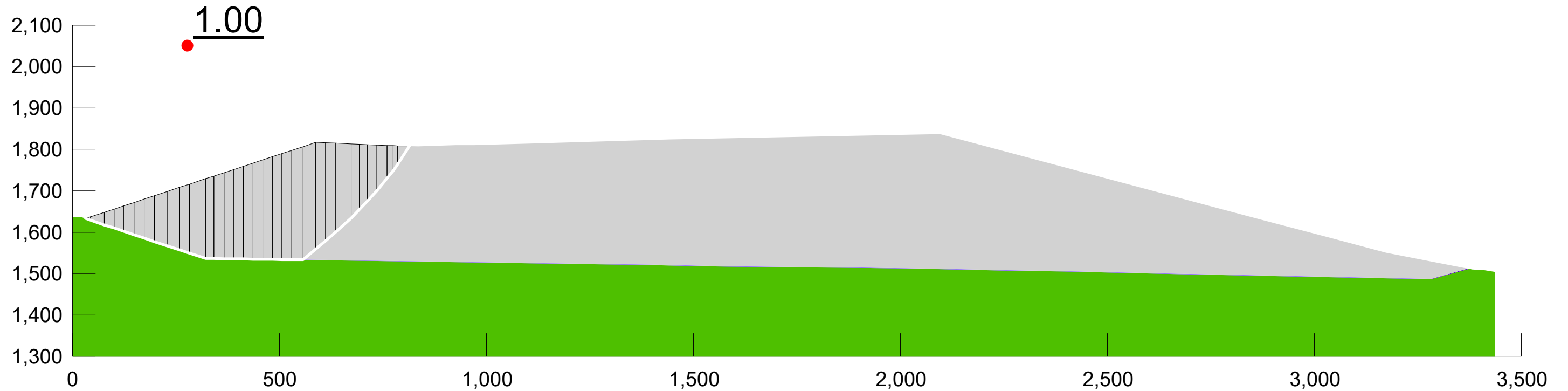
Color	Name	Material Model	Unit Weight (pcf)	Effective Cohesion (psf)	Effective Friction Angle (°)
Light Blue	Liner_Future Cell Floor	Mohr-Coulomb	100	0	16
Dark Blue	Liner_Future Cell Side Slope	Mohr-Coulomb	100	0	9
Green	Subgrade	Bedrock (Impenetrable)			
Grey	Waste (Kavazanjan et al. 2013)	Mohr-Coulomb	85	900	31



Roosevelt Regional Landfill Description: Section F-F'	
Roosevelt_Vertical Exp._Section F-F'_(Left)_01.gsz	
11/16/2021	1:3,000

Horz Seismic Coef.: 0.26

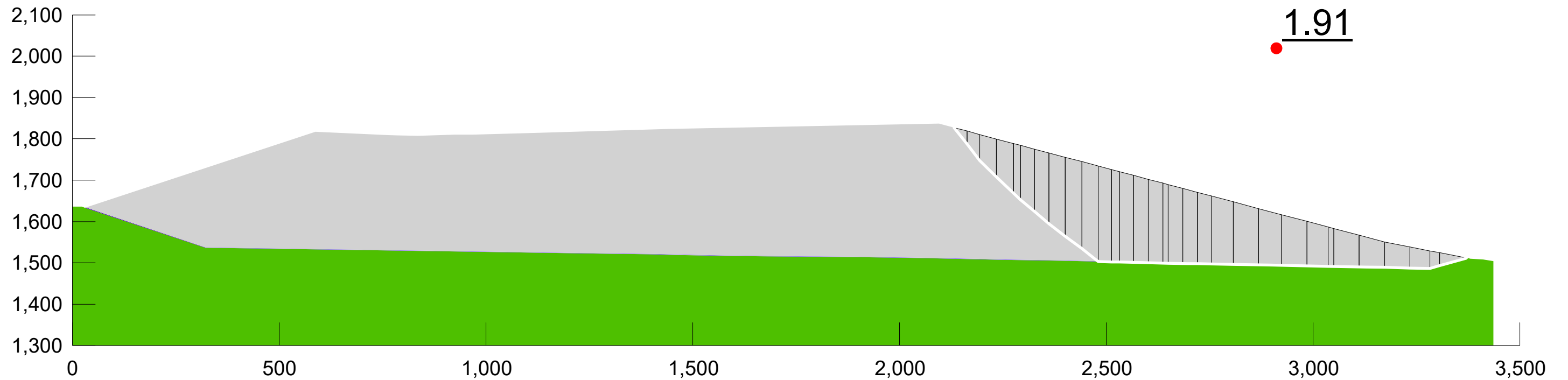
Color	Name	Material Model	Unit Weight (pcf)	Effective Cohesion (psf)	Effective Friction Angle (°)
Light Blue	Liner_Future Cell Floor	Mohr-Coulomb	100	0	16
Dark Blue	Liner_Future Cell Side Slope	Mohr-Coulomb	100	0	9
Green	Subgrade	Bedrock (Impenetrable)			
Grey	Waste (Kavazanjan et al. 2013)	Mohr-Coulomb	85	900	31



Roosevelt Regional Landfill Description: Section F-F'	
Roosevelt_Vertical Exp._Section F-F'_(Left)_01_EQ.gsz	
11/16/2021	1:3,000

Horz Seismic Coef.: 0

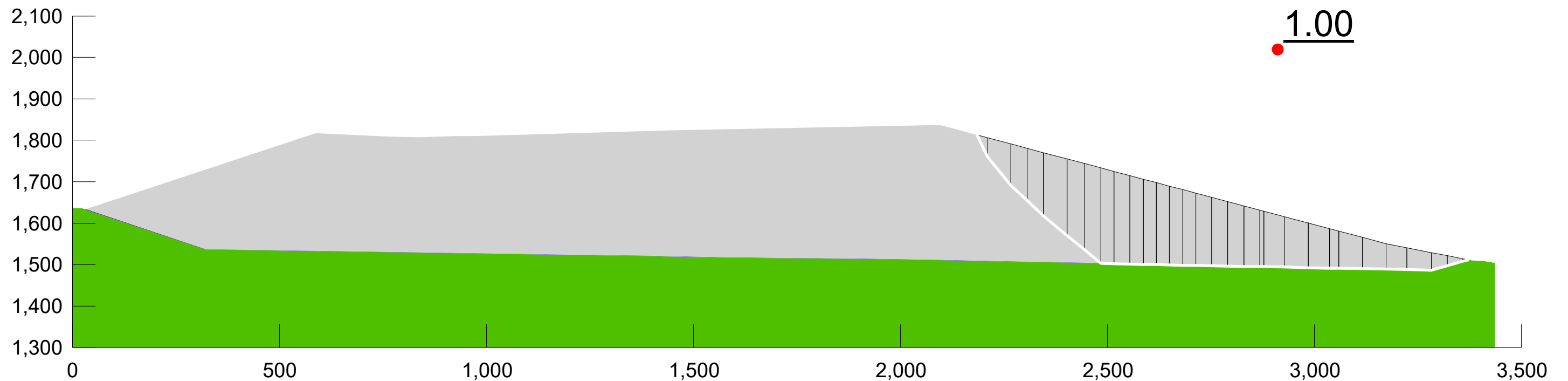
Color	Name	Material Model	Unit Weight (pcf)	Effective Cohesion (psf)	Effective Friction Angle (°)
Light Blue	Liner_Future Cell Floor	Mohr-Coulomb	100	0	16
Dark Blue	Liner_Future Cell Side Slope	Mohr-Coulomb	100	0	9
Green	Subgrade	Bedrock (Impenetrable)			
Grey	Waste (Kavazanjian et al. 2013)	Mohr-Coulomb	85	900	31



Roosevelt Regional Landfill Description: Section F-F'	
Roosevelt_Vertical Exp._Section F-F'_(Right)_01.gsz	
11/16/2021	1:3,000

Horz Seismic Coef.: 0.185

Color	Name	Material Model	Unit Weight (pcf)	Effective Cohesion (psf)	Effective Friction Angle (°)
Light Blue	Liner_Future Cell Floor	Mohr-Coulomb	100	0	16
Dark Blue	Liner_Future Cell Side Slope	Mohr-Coulomb	100	0	9
Green	Subgrade	Bedrock (Impenetrable)			
Grey	Waste (Kavazanjian et al. 2013)	Mohr-Coulomb	85	900	31



Roosevelt Regional Landfill Description: Section F-F'	
Roosevelt_Vertical Exp._Section F-F'_(Right)_01_EQ.gsz	
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ATTACHMENT 2

SEISMIC DISPLACEMENT CALCULATIONS

Roosevelt Regional Landfill Displacement Analysis Input Summary Page

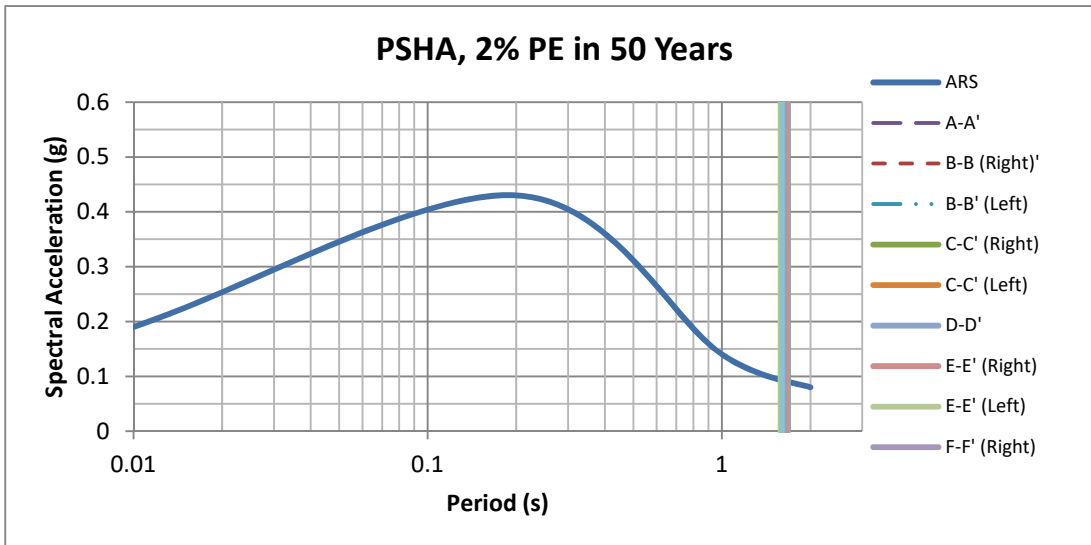
Summary:

Simplified Procedure for Estimating Earthquake Induced Deviatoric Slope Displacements
by Jonathan D. Bray and Thaleia Travararou

Input Parameters and Calculated Maximum Permanent Seismic Displacements

Cross Section	K_y (g)	H (ft)	$(V_s)_{avg}$ (ft/s)	T_s (s)	T_d (s)	$S_a @ T_d$ (g)	D_{50} (cm)
A-A'	0.09	262	812	1.07	1.60	0.09	< 1
B-B' (Right)	0.19	260	804	1.07	1.60	0.09	< 1
B-B' (Left)	0.21	284	845	1.11	1.66	0.09	< 1
C-C' (Right)	0.10	289	853	1.12	1.68	0.09	< 1
C-C' (Left)	0.22	285	845	1.11	1.67	0.09	< 1
D-D'	0.19	289	853	1.12	1.68	0.09	< 1
E-E' (Right)	0.15	284	845	1.11	1.66	0.09	< 1
E-E' (Left)	0.15	248	776	1.06	1.58	0.10	< 1
F-F' (Right)	0.19	270	820	1.09	1.63	0.09	< 1
F-F' (Left)	0.26	233	722	1.07	1.60	0.10	< 1

- k_y = yield acceleration of sliding mass (from pseudostatic slope stability evaluation)
- H = Representative thickness of waste fill from pseudostatic slope stability evaluation
- $(V_s)_{avg}$ = Average (over H) shear wave velocity of waste fill
- T_s = Initial fundamental period of waste fill ($3.3 H / (V_s)_{avg}$)
- $T_d = 1.5 T_s$ = Degraded initial fundamental period of waste fill
- S_a = Spectral Acceleration (mean value)
- $S_a @ T_d$ = Spectral Acceleration evaluated at T_d (see chart below)
- D_{50} = Displacement with a 50 percent probability of exceedance



References:

Bray, J.D. and Travararou, T. (2007), "Simplified Procedure for Estimating Earthquake-Induced Deviatoric Slope Displacements," *Journal of Geotechnical and Geoenvironmental Engineering*, ASCE, Vol 133, No. 4, pp 381-392.

Kavazanjian, E., Matasovic, N., and Bachus, R.C. (2013), "11th Peck Lecture: Pre-Design Geotechnical Investigation for the OII Superfund Site Landfill," *ASCE Journal of Geoenvironmental Engineering*, Vol. 139, No. 11, pp 1849-1863.

Appendix A.2

Pipe Strength Calculations

SUPPLEMENTAL DURABILITY CALCULATIONS FOR BURIED LEACHATE COLLECTION PIPE

Calculations were performed to demonstrate that a 12" diameter SDR 17 leachate collection pipe will survive without crushing or buckling beneath 340 feet of waste. The pipe is assumed to have 2 feet of gravel over its crown, but no granular bedding layer. The gravel over the pipe crown will be placed without compaction. Similar calculations had been performed previously by Thiel Engineering for waste heights up to 300 feet (Thiel 2000). These revised calculations were performed for the 2001 Supplemental EIS.

Givens and Assumptions: The pipe will be embedded in crushed gravel such that a minimum of 2 feet of gravel will exist over the pipe crown. The pipe will lay directly on the geotextile cushion on a geomembrane liner. There will be no special pipe bedding. The following geometric and material parameters were assumed:

- A conservative soil modulus for the gravel of 1000 psi was assumed (ref. Driscopipe, 1991) to represent gravel without compaction. Assumptions related to the pipe modulus and acceptable pipe deformations were taken as the default values from Driscopipe (1997).
- A conservatively high waste density of 95 pounds per cubic foot (pcf) was assumed. This was estimated by assuming that one cubic yard of in-place waste mass consists of 1600 lbs of gate-received waste, 420 lbs of soil (15% of volume), and a 25% safety factor to allow for densification that might occur due to moisture addition from rain or leachate reintroduction. The decrease in density due to landfill gas formation was neglected.
- The maximum waste depth was assumed to be 340 feet.
- There will be 2 feet of gravel installed over the crown of the pipe.
- The pipe is 12-inch diameter SDR 17 HDPE.

Approach: Since the pipe is buried in crushed gravel, significant stress and strain relief on the pipe will be provided by soil arching action of the gravel around the pipe since the pipe allows for some deformation for arching to occur. The calculation for stress relief due to arching is provided by Terzaghi (1943). The input to the calculation is the uniform vertical stress at the top of the gravel layer (calculated as the waste thickness times the waste density), the pipe diameter, the unit weight of the gravel, the friction angle of the gravel, and the thickness of gravel above the top of the pipe. The output result of the calculation is the vertical stress at the top of the pipe.

To determine if the resulting stress at the top of the pipe is acceptable, the durability formulae provided by Driscopipe (1991) are used to check for pipe crushing, wall buckling, and ring deflection. These formulae are encoded in a computer program provided by Driscopipe (1997), which was used in this analysis. The input to this program includes the Dimension Ratio (DR)

used for the pipe, the thickness and unit weight of the soil above the top of the pipe, the modulus of the soil surrounding the pipe, and the pipe modulus. The computer program default values for the pipe modulus and allowable stresses and deflections in the pipe were used for Driscopipe 1000 (standard industrial grade HDPE pipe). The product of the unit weight and thickness of soil above the pipe were adjusted to equal the vertical stress at the top of the pipe that was calculated from the Terzaghi soil-arching equation.

Results: Results of the soil-arching analysis are presented in Table C1 on the attached spreadsheet. The results show that for a 2-foot gravel covering over a 1-foot diameter pipe under 340 feet of waste, the stress at the top of the pipe is approximately 1,189 pounds per square foot (psf).

To simulate the pressure of 1,189 psf at the top of the pipe, a soil density of 110 pcf and burial depth of 9.6 feet were entered into the Driscopipe Direct Burial program. The computed pipe survivability calculation results are as follows:

- Crushing factor of safety: 22.7
- Wall buckling factor of safety: 12.4
- Ring deflection: 0.83% (acceptable)

These results are applicable for gravel placed against the springline of the pipe, and over the pipe to the depth assumed in the analysis. The results are independent of the bedding conditions. The results are comparable to the previous Thiel Engineering (2000) calculations, and demonstrate that increasing the waste thickness from 300' to 340' has a negligible effect on the pipe durability.

References:

Driscopipe. 1991. Engineering Characteristics. Design guide available from manufacturer.

Driscopipe. 1997. Design and Applications, computer program version 3.5, release date June 1, 1997.

Terzaghi, K. 1943. *Theoretical Soil Mechanics*. John Wiley & Sons, New York, pp. 66-76

Thiel Engineering. (2000) Pipe Burial Calculations for Roosevelt Regional Landfill. Pages 1-8.

Table C1 – Results of Pipe Arching Calculation

Waste unit wt (pcf)	Height of Waste (ft)	Pipe Diam. (ft)	Thick-ness of gravel above pipe (ft)	Gravel unit wt (pcf)	Friction angle of gravel (deg)	n	a	b	Vertical Stress (psf)	Pipe SDR	Compres-sive Stress - Drisco formula (psi)	Drisco-pipe Safety Factor for Wall Crushing
95	340	1	0	110	40	0	-	1.00	32,300	17	1,794	0.84
95	340	1	0.5	110	40	1	0.68	0.43	13,994	17	777	1.93
95	340	1	1	110	40	2	0.97	0.19	6,084	17	338	4.44
95	340	1	1.5	110	40	3	1.10	0.08	2,666	17	148	10.13
95	340	1	2	110	40	4	1.15	0.03	1,189	17	66	22.70
95	340	1	2.5	110	40	5	1.17	0.02	551	17	31	48.99
95	340	1	3	110	40	6	1.18	0.01	275	17	15	98.06
95	340	1	3.5	110	40	7	1.19	0.00	156	17	9	172.85
95	340	1	4	110	40	8	1.19	0.00	105	17	6	257.83
95	340	1	4.5	110	40	9	1.19	0.00	82	17	5	327.38
95	340	1	5	110	40	10	1.19	0.00	73	17	4	370.57
95	340	1	5.5	110	40	11	1.19	0.00	69	17	4	392.97
95	340	1	6	110	40	12	1.19	0.00	67	17	4	403.51
95	340	1	10	110	40	20	1.19	0.00	66	17	4	411.91

STRUCTURAL PIPE CALCULATION WORKSHEET



Project Name: Roosevelt Regional Landfill
SEIS - Maximum Elevation Increase
 Project Number: AU20.1209.00
 Calculation By: ASO
 Calculation Date: November 18, 2021

Description: Check whether existing pipe strength is acceptable for proposed action fill plan grades

Compressive Stress

Description	Units	Areas 1-8	Areas 9-11	Areas 12-22 and Future Cells
Unit Weight of Waste	pcf	95.0	95.0	95.0
Waste Fill Height	ft	315	340	350
Final Cover Unit Weight	pcf	120	120	120
Final Cover Height	ft	4	4	4
Overburden Stress	psf	30405	32780	33730
Overburden Stress	psi	211	228	234
Nominal Outer Diameter of Pipe	in	12	8	8
Outer Diameter of Pipe	in	13.2	9.05	9.05
Dimension Ratio (DR)	--	15.5	17	11
Pipe Wall Thickness (t)	in	0.85	0.53	0.82
Mean Radius of Pipe (r _m)	in	6.17	4.26	4.11
Perforation Diameter	in	0.25	0.5	0.5
Perforation Spacing	in	6	6	6
Number of Perforations Around Pipe	--	4	4	4
Reduced Pipe Length Accounting for Perforations (L _p)	in	2	4	4
Length Based on Overburden Correction	in	1.20	1.50	1.50
Reduced Pipe Area to Account for Perforations (L _a)	in ²	0.39	1.57	1.57
Area Based Overburden Correction	--	1.002	1.010	1.010
Design Overburden Stress	psf	30456	33104	34075
Design Overburden Stress	psi	212	230	237
Constrained Modulus of Pipe Backfill (M _s) <small>Assumes Gravelly Sand/Gravel at 95% Std Proctor (McGrath, 1998)</small>	psi	11014	11668	11929
Assumed Pipe Temperature	*F	100	100	100
Assumed Load Duration	years	100	100	100
Pipe Apparent Elastic Modulus (E)	psi	28000	28000	28000
Temperature Multiplier	--	0.73	0.73	0.73
Long Term Pipe Modulus of Elasticity (E)	psi	20440	20440	20440
Hoop Thrust Stiffness (S _a)	--	5.59	6.53	4.17
Vertical Arching Factor (VAF)	--	0.48	0.45	0.54
Radial Directed Earth Pressure (P _{RD})	psf	14537	14737	18483
Ring Compressive Stress (S)	psi	782.4	869.9	705.9
Allowable Compressive Stress at 100°F	psi	897	897	897
Compressive Stress OK?	--	YES	YES	YES

Ring Deflection Using the Watkins-Gaube Graph

Description	Units	Areas 1-8	Areas 9-11	Areas 12-22 and Future Cells
Poisson's Ratio of Backfill Material (μ)	--	0.3	0.3	0.3
Secant Modulus of Soil (E _s)	psi	8182	8667	8861
Ridgidity Factor (R _r)	--	14644	20842	5202
Deformation Factor (D _r)	--	1.9	2.0	1.6
Soil Strain (ε _s)	%	2.6	2.6	2.6
Deflection	%	4.9	5.3	4.2
Acceptable Deflection	%	7.5	7.5	7.5
Defelction OK?	--	YES	YES	YES

Moore-Selig Constrained Pipe Wall Buckling (for dry soil)

Description	Units	Areas 1-8	Areas 9-11	Areas 12-22 and Future Cells
Calibration Factor (φ)	--	0.55	0.55	0.55
Geometry Factor (R _g)	--	1.0	1.0	1.0
Pipe Wall Moment of Inertia (I)	in ⁴ /in	0.051	0.013	0.046
Mod Secant Modulus of Soil (E _s [*])	--	11689	12382	12659
Moore-Selig Critical Buckling Pressure (P _{CR})	psi	560.0	527.3	856.3
Acceptable Factor of Safety	--	2	2	2
Factor of Safety	--	5.55	5.15	6.67
Buckling OK?	--	YES	YES	YES

Luscher Constrained Pipe Wall Buckling

Description	Units	Areas 1-8	Areas 9-11	Areas 12-22 and Future Cells
Height of Fill (H)	ft	315	340	350
Height of Groundwater (H _{GW})	ft	0	0	0
Elastic Support Coefficient (B')	--	1.0	1.0	1.0
Buoyancy Reduction Factor (R)	--	1.0	1.0	1.0
Luscher's Critical Buckling Pressure (P _{CR} @ N=1)	psi	443.2	393.6	805.4
Acceptable Factor of Safety	--	2	2	2
Factor of Safety	--	4.4	3.8	6.3
Buckling OK?	--	YES	YES	YES

STRUCTURAL PIPE CALCULATION WORKSHEET

Pipe calculations are as presented by the Plastic Pipe Institute in the Second Edition Handbook of PE Pipe

$$(3-21) \quad VAF = 0.88 - 0.71 \left| \frac{S_A - 1}{S_A + 2.5} \right|$$

WHERE

VAF = Vertical Arching Factor
 S_A = Hoop Thrust Stiffness Ratio

$$(3-22) \quad S_A = \frac{1.43 M_S I_{CENT}}{EA}$$

WHERE

I_{CENT} = radius to centroidal axis of pipe, in
 M_S = one-dimensional modulus of soil, psi
 E = apparent modulus of elasticity of pipe material, psi (See Appendix, Chapter 3)
 A = profile wall average cross-sectional area, in²/in, or wall thickness (in) for DR pipe

$$(3-23) \quad P_{RD} = (VAF)WH$$

WHERE

P_{RD} = radial directed earth pressure, lb/ft²
 W = unit weight of soil, pcf
 H = depth of cover, ft

$$(3-13) \quad S = \frac{(P_E + P_L) DR}{288}$$

WHERE

P_E = vertical soil pressure due to earth load, pcf
 P_L = vertical soil pressure due to live-load, pcf
 S = pipe wall compressive stress, lb/in²
 DR = Dimension Ratio, D_o/t
 D_o = pipe outside diameter (for profile pipe $D_o = D_i + 2H_p$), in
 D_i = pipe inside diameter, in
 H_p = profile wall height, in
 A = profile wall average cross-sectional area, in²/in
 (Obtain the profile wall area from the manufacturer of the profile pipe.)

$$(3-26) \quad E_S = M_S \frac{(1 + \mu)(1 - 2\mu)}{(1 - \mu)}$$

TABLE 3-13

Typical range of Poisson's Ratio for Soil (Bowles (21))

Soil Type	Poisson's Ratio, μ
Saturated Clay	0.4-0.5
Unsaturated Clay	0.1-0.3
Sandy Clay	0.2-0.3
Silt	0.3-0.35
Sand (Dense)	0.2-0.4
Coarse Sand (Void Ratio 0.4-0.7)	0.15
Fine-grained Sand (Void Ratio 0.4-0.7)	0.25

Reference Information:

Plastic Pipe Institute, 2012. *Handbook of Polyethylene Pipe*, 2nd Edition, June 6. Retrieved from: <https://plasticpipe.org/publications/pe-handbook.html>. Retrieved on April 17, 2018.

Plastic Pipe Institute, 2010. *Large Scale Constrained Modulus Test*, February 8. Retrieved from <https://plasticpipe.org/pdf/ms-study-report.pdf>. Retrieved on April 17, 2018.

$$(3-24) \quad R_F = \frac{12 E_S (DR - 1)^3}{E}$$

WHERE

DR = Dimension Ratio
 E_S = Secant modulus of the soil, psi
 E = Apparent modulus of elasticity of pipe material, psi
 I = Pipe wall moment of inertia of pipe, in⁴/in
 D_M = Mean diameter ($D_i + 2z$ or $D_o - t$), in

$$(3-27) \quad \epsilon_S = \frac{WH}{144 E_S}$$

WHERE

W = unit weight of soil, pcf
 H = depth of cover (height of fill above pipe crown), ft
 E_S = secant modulus of the soil, psi

The designer can find the pipe deflection as a percent of the diameter by multiplying the soil strain, in percent, by the deformation factor:

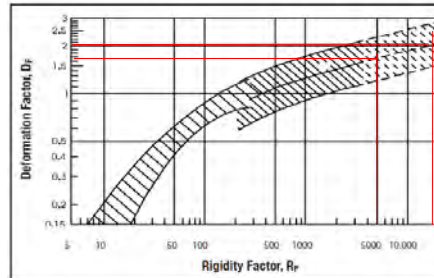


Figure 3-6 Watkins-Gaube Graph

$$(3-28) \quad \frac{\Delta X}{D_M} (100) = D_F \epsilon_S$$

$$(3-29) \quad P_{CR} = \frac{2.4 \phi R_H (EI)^{1/3} (E_S^*)^{2/3}}{D_M}$$

WHERE

P_{CR} = Critical constrained buckling pressure, psi
 ϕ = Calibration Factor, 0.55 for granular soils
 R_H = Geometry Factor
 E = Apparent modulus of elasticity of pipe material, psi
 I = Pipe wall moment of inertia, in⁴/in (³/12, if solid wall construction)
 E_S^* = $E_S / (1 - \mu)$
 E_S = Secant modulus of the soil, psi
 μ_S = Poisson's Ratio of Soil (Consult a textbook on soil for values. Bowles (1982) gives typical values: for sand and rock ranging from 0.1 to 0.4.)

$$(3-17) \quad R = 1 - 0.33 \frac{H_{GW}}{H}$$

WHERE

R = buoyancy reduction factor
 H_{GW} = height of ground water above pipe, ft
 H = depth of cover, ft

$$(3-18) \quad B' = \frac{1}{1 + 4 e^{(0.0631)}}$$

WHERE

e = natural log base number, 2.71828
 E' = soil reaction modulus, psi
 E = apparent modulus of elasticity, psi
 DR = Dimension Ratio
 I = pipe wall moment of inertia, in⁴/in (³/12, if solid wall construction)
 D_M = Mean diameter ($D_i + 2z$ or $D_o - t$), in

$$(3-15) \quad P_{WC} = \frac{5.65}{N} \sqrt{RB'E' \frac{E}{12(DR - 1)^3}}$$

WHERE

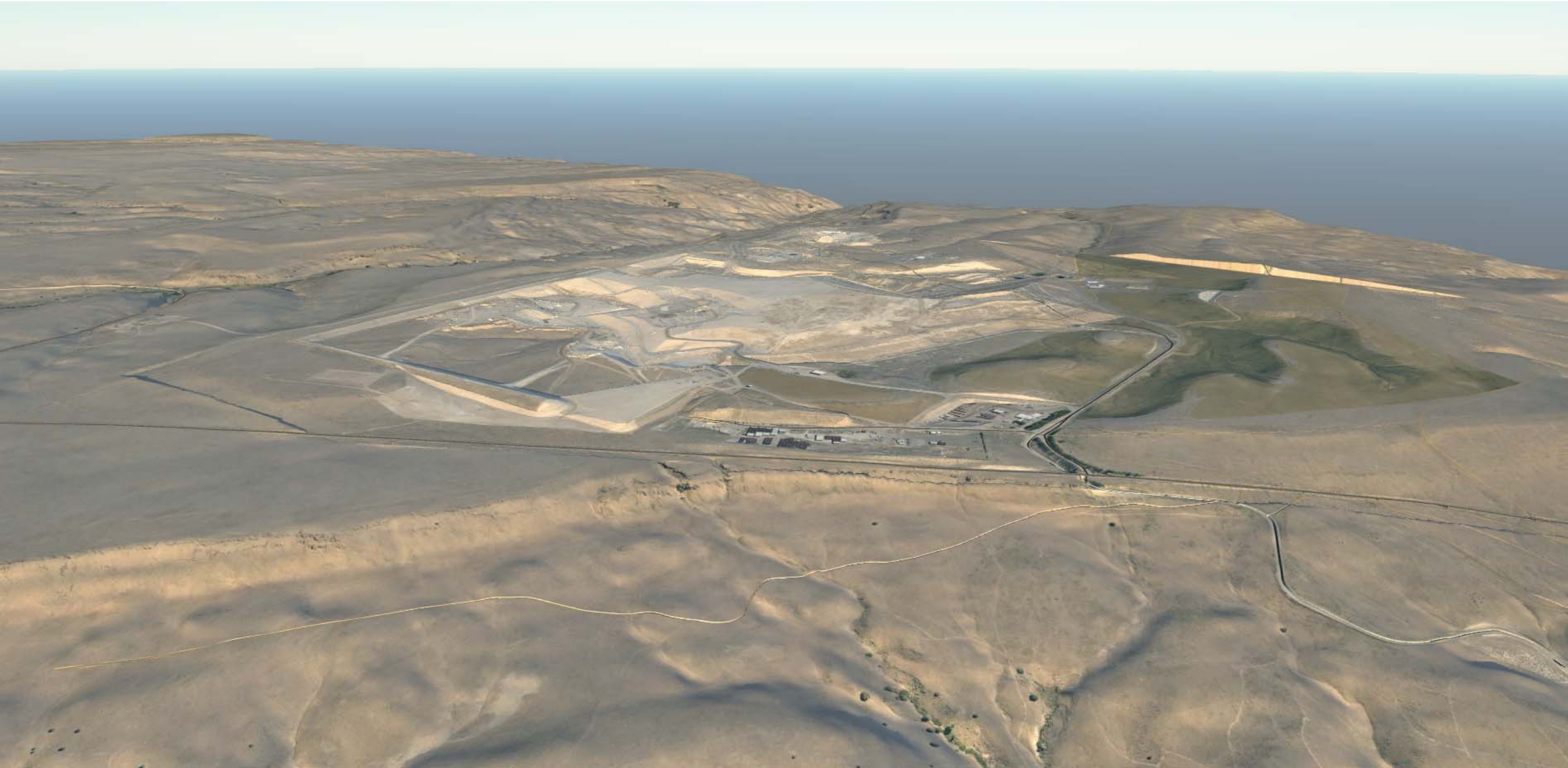
P_{WC} = allowable constrained buckling pressure, lb/in²
 N = safety factor

Appendix A.3

Aerial and Viewsheds for the No Action and Proposed Action Alternatives

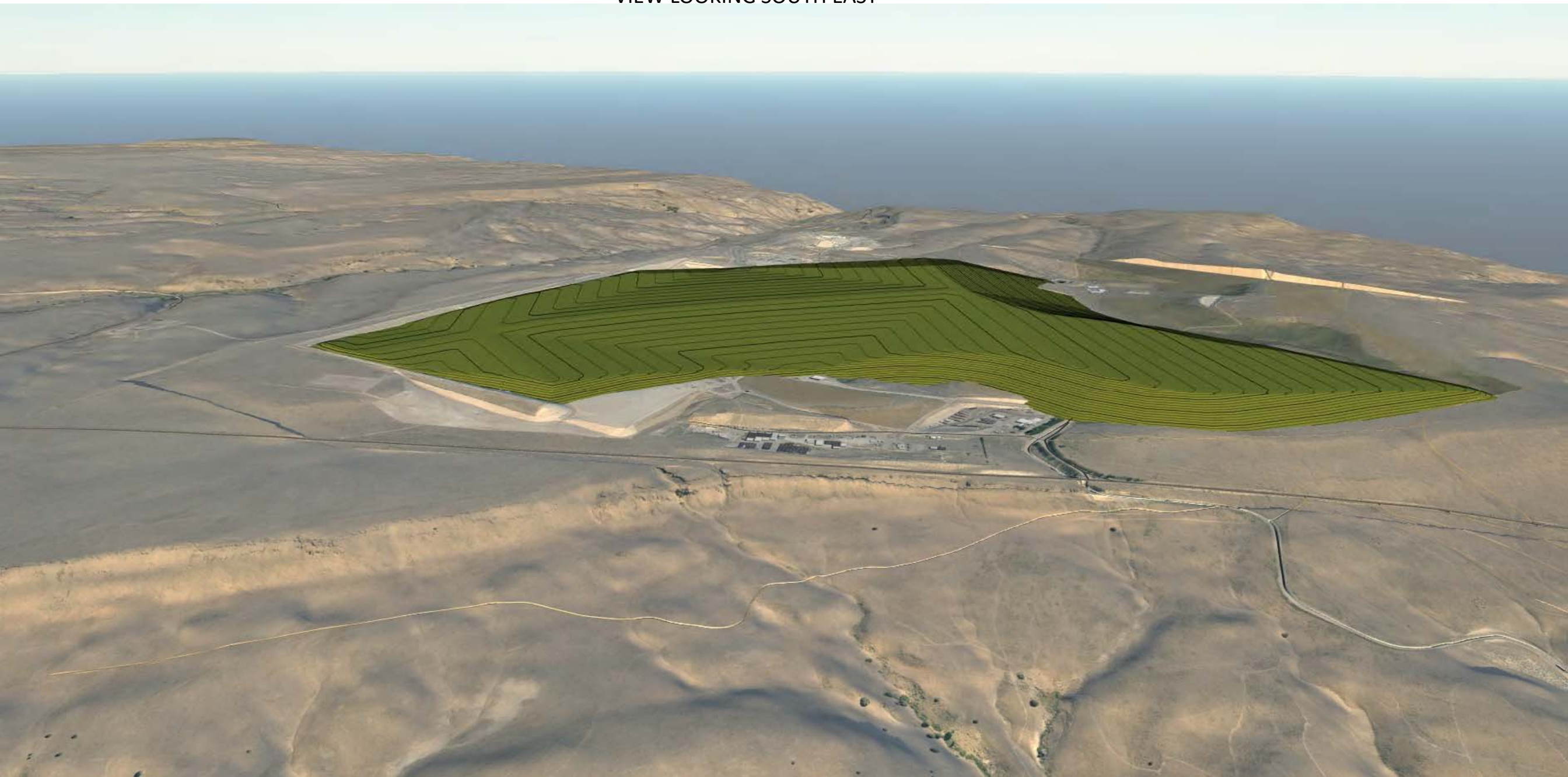
AERIAL PERSPECTIVE – EXISTING CONDITIONS

VIEW LOOKING SOUTH EAST



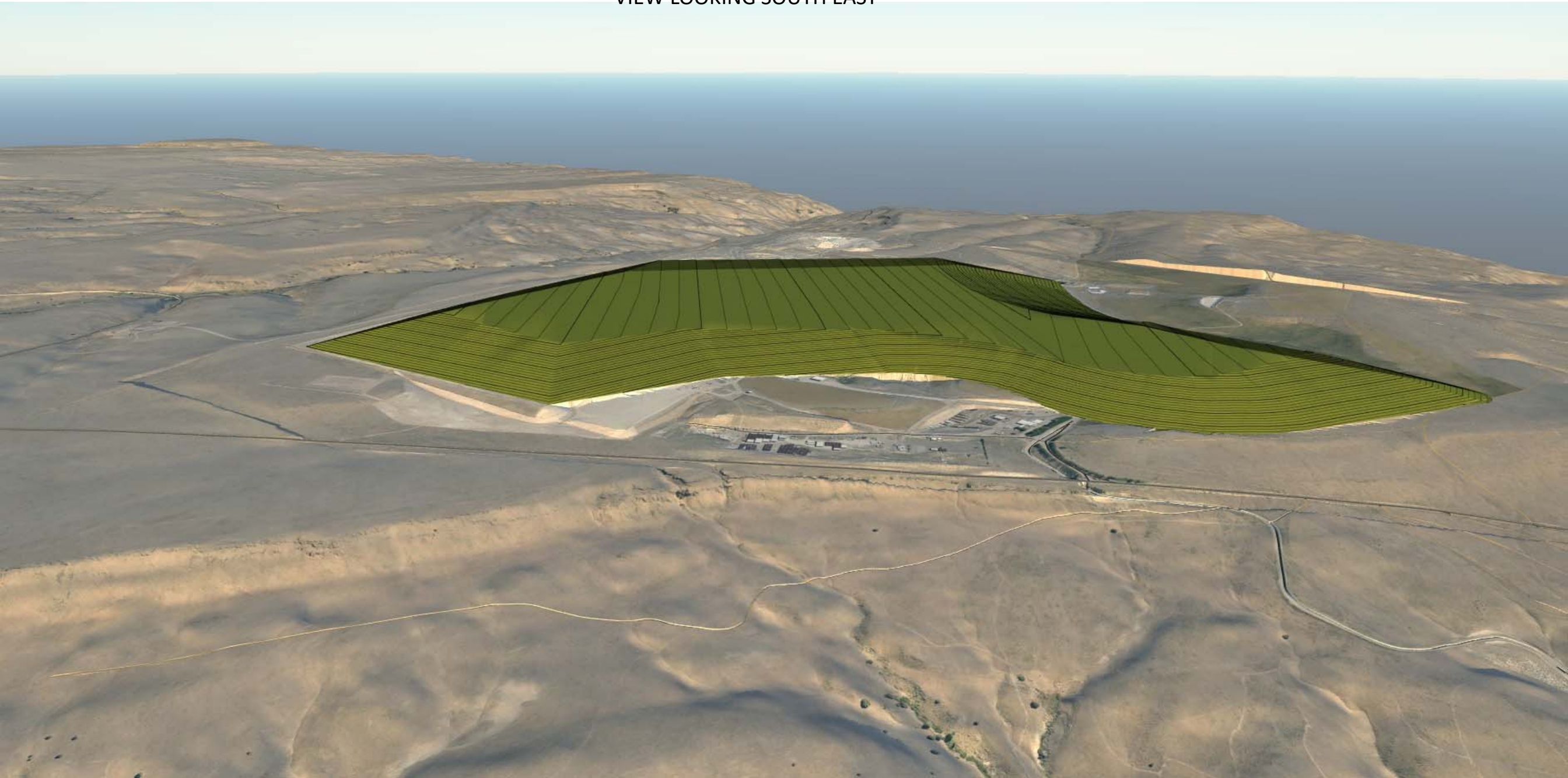
AERIAL PERSPECTIVE – PERMITTED GRADES (No Action)

VIEW LOOKING SOUTH EAST



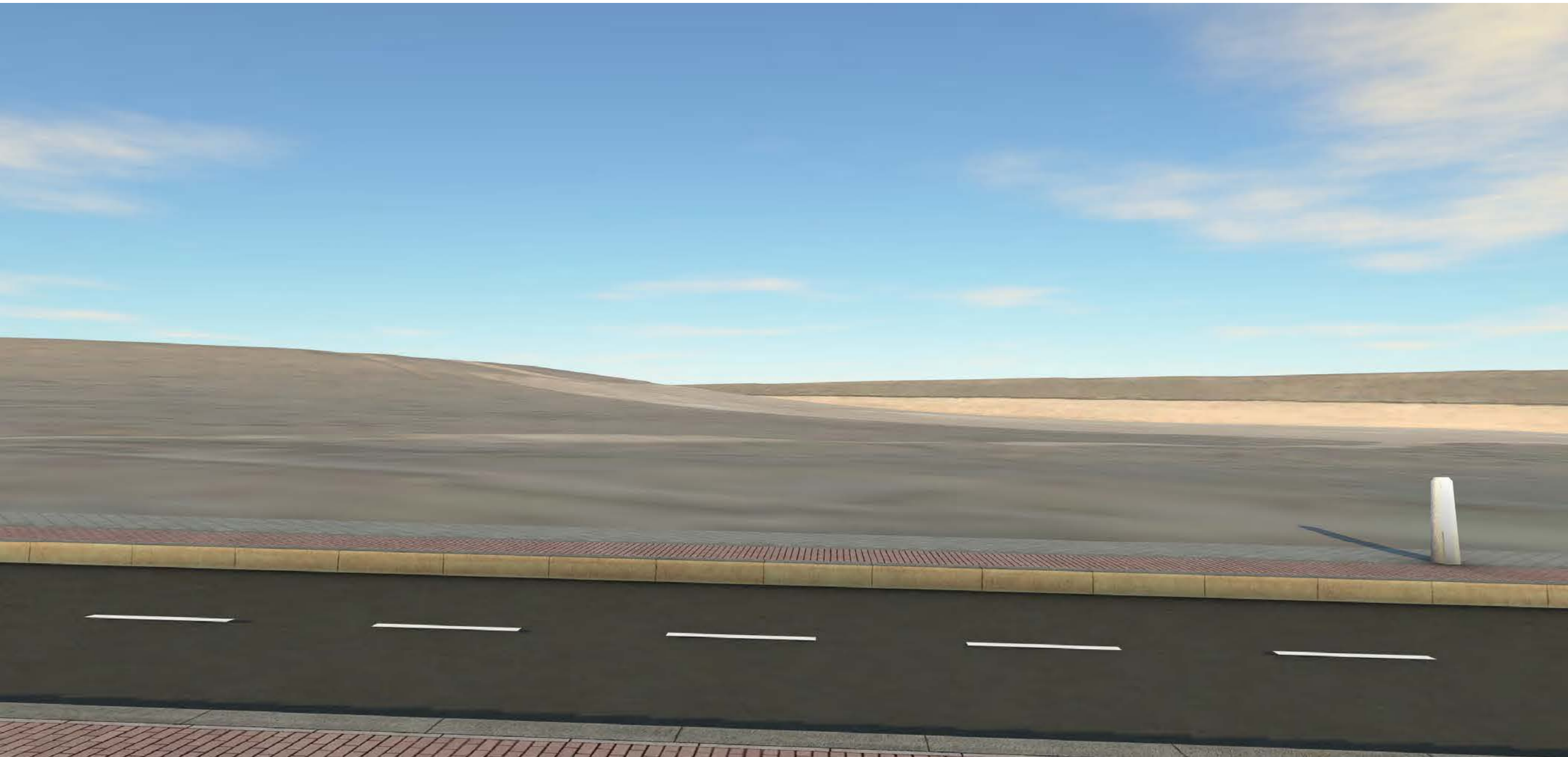
AERIAL PERSPECTIVE – PROPOSED ACTION GRADES

VIEW LOOKING SOUTH EAST



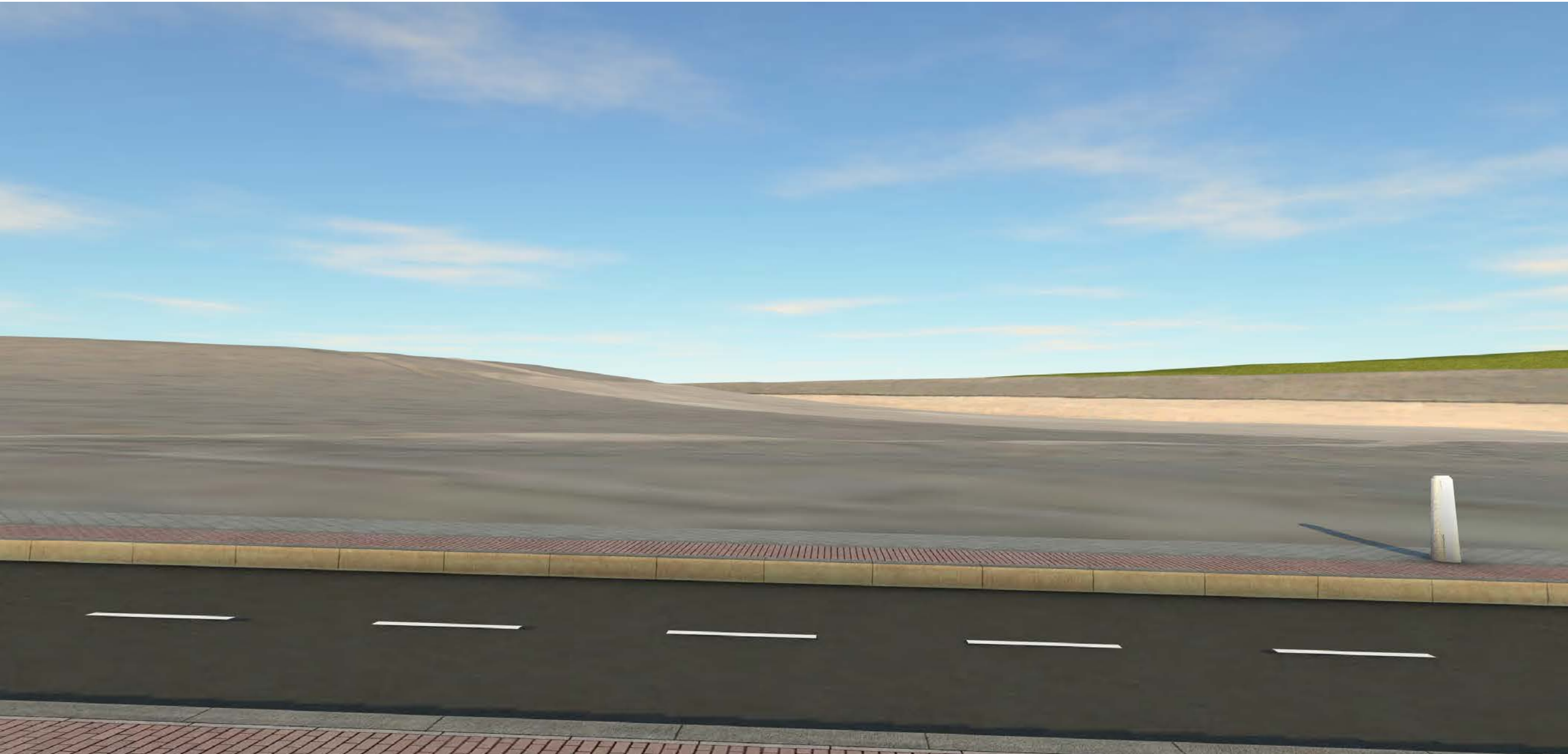
VIEWPOINT 1 – EXISTING CONDITIONS

VIEW LOOKING EAST FROM EAST ROAD



VIEWPOINT 1 – NO ACTION ALTERNATIVE

VIEW LOOKING EAST FROM EAST ROAD



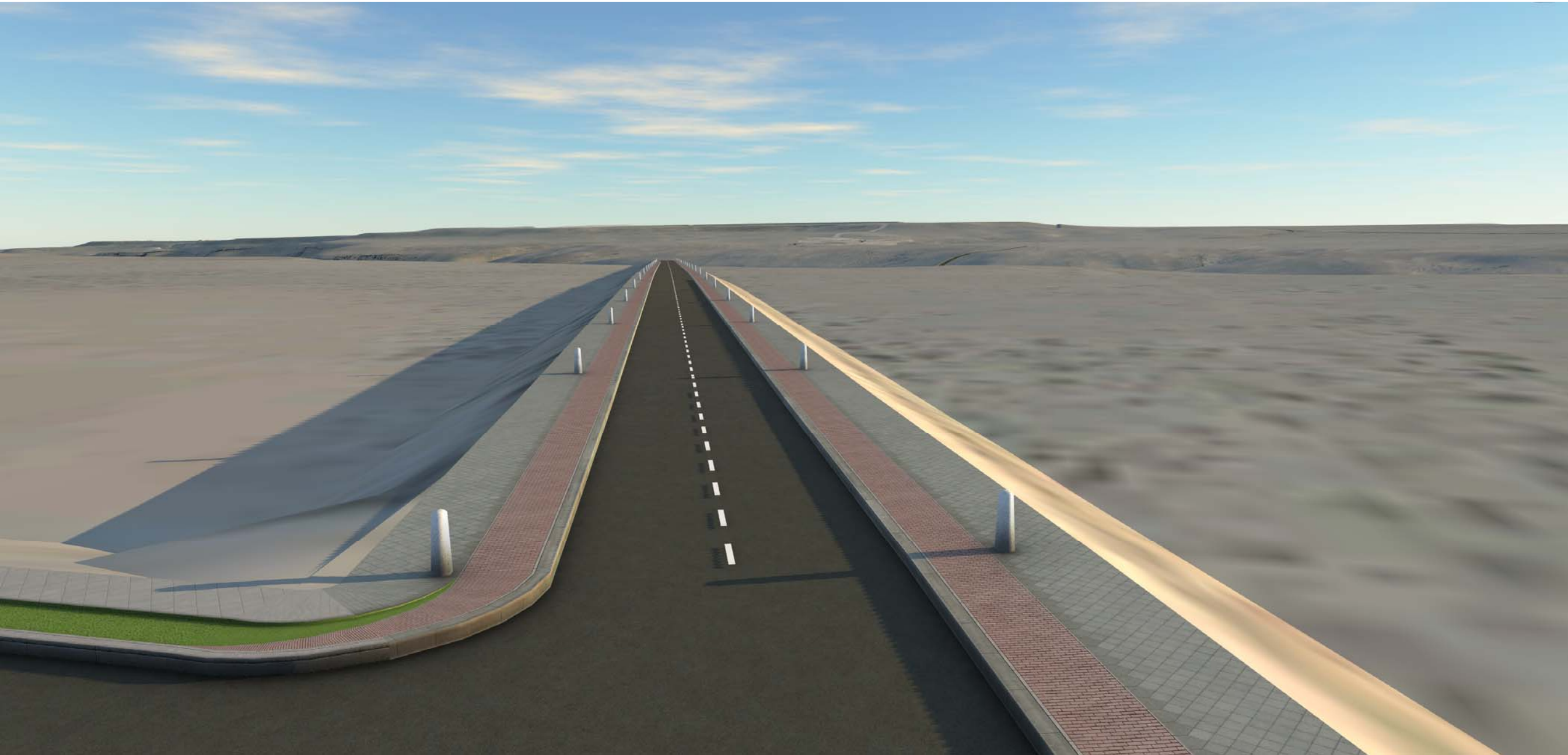
VIEWPOINT 1 – PROPOSED ACTION ALTERNATIVE

VIEW LOOKING EAST FROM EAST ROAD



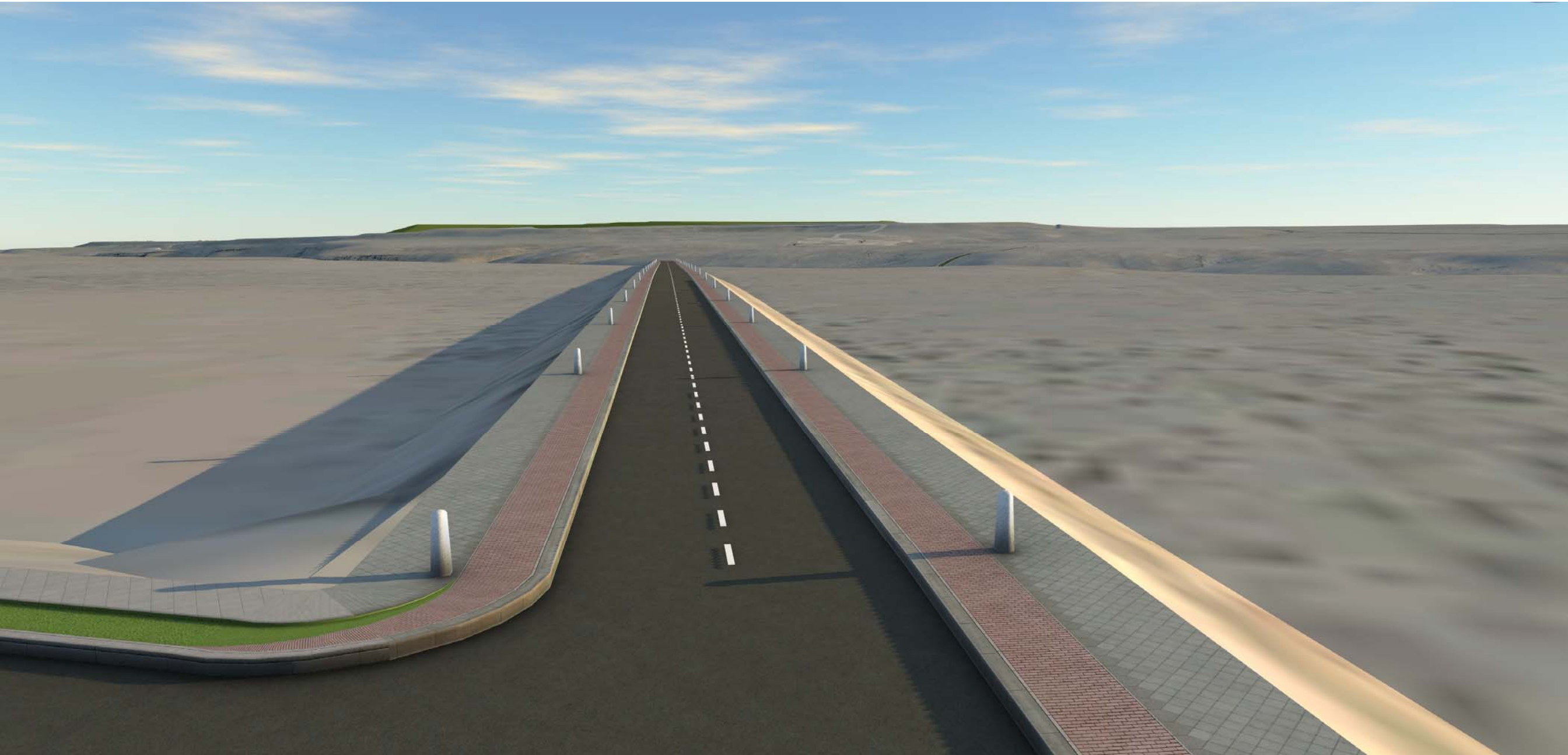
VIEWPOINT 2 – EXISTING CONDITIONS

VIEW LOOKING SOUTH FROM THE INTERSECTION OF EAST ROAD AND SIX PRONG ROAD



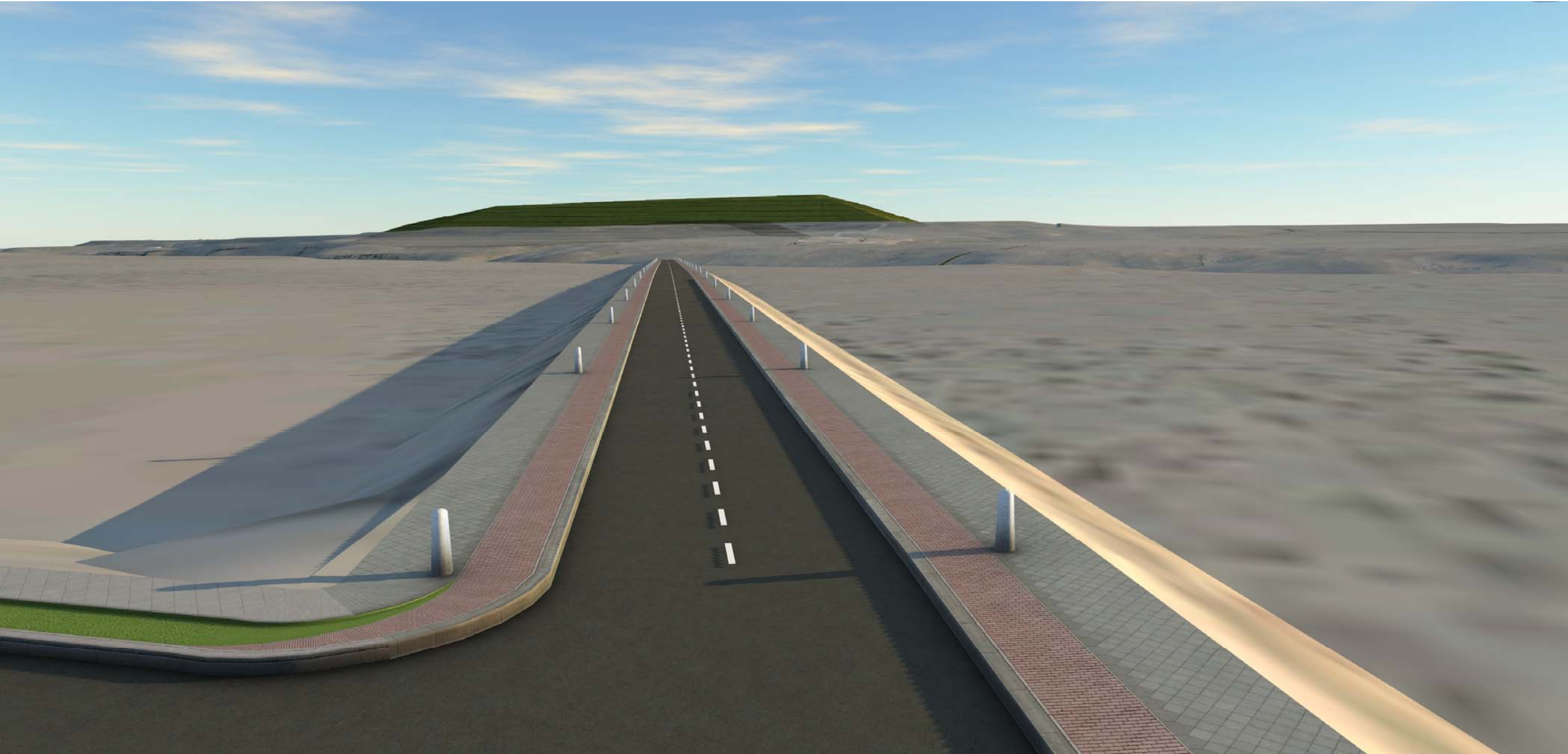
VIEWPOINT 2 – NO ACTION ALTERNATIVE

VIEW LOOKING SOUTH FROM THE INTERSECTION OF EAST ROAD AND SIX PRONG ROAD



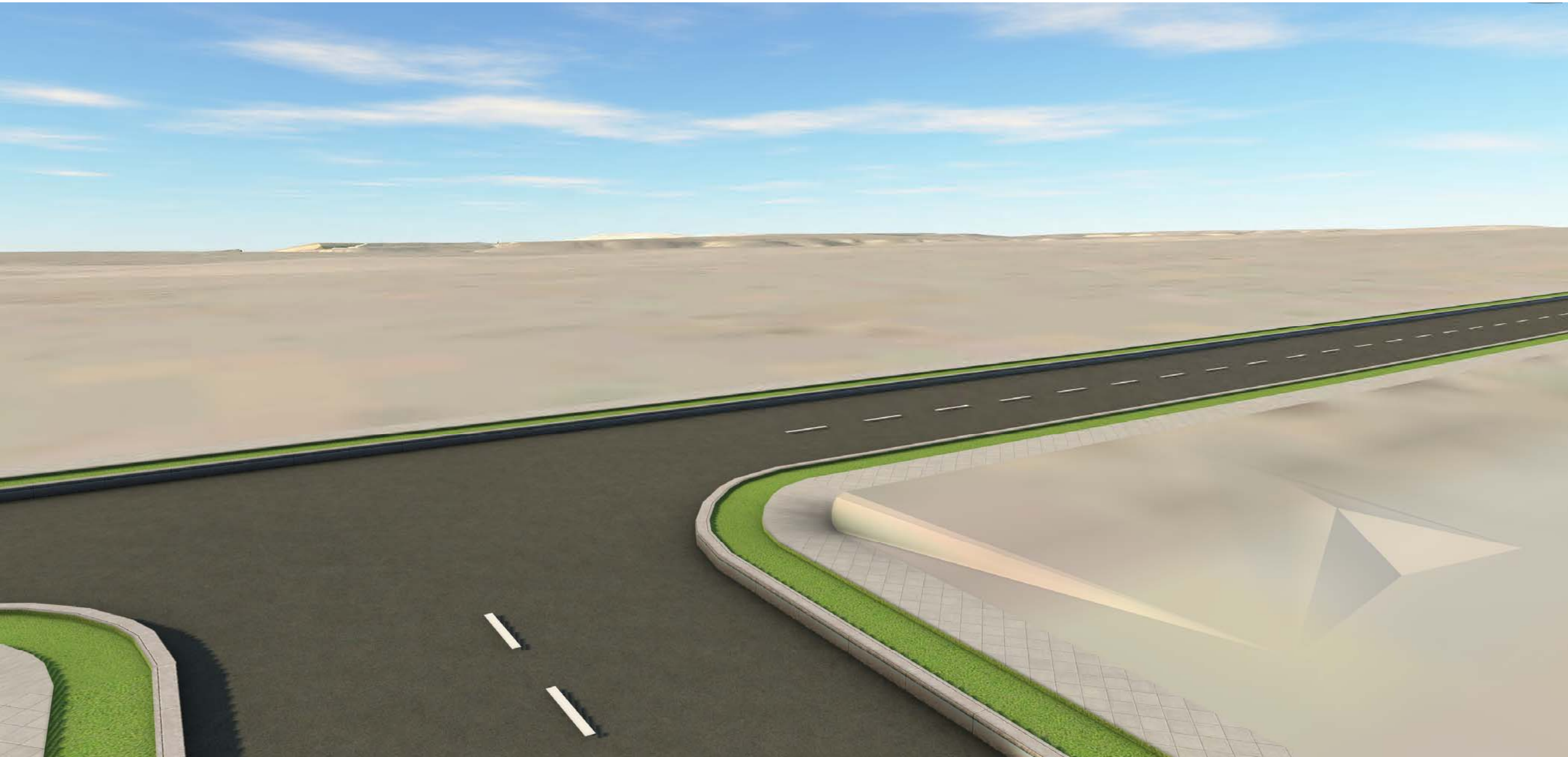
VIEWPOINT 2 – PROPOSED ACTION ALTERNATIVE

VIEW LOOKING SOUTH FROM THE INTERSECTION OF EAST ROAD AND SIX PRONG ROAD



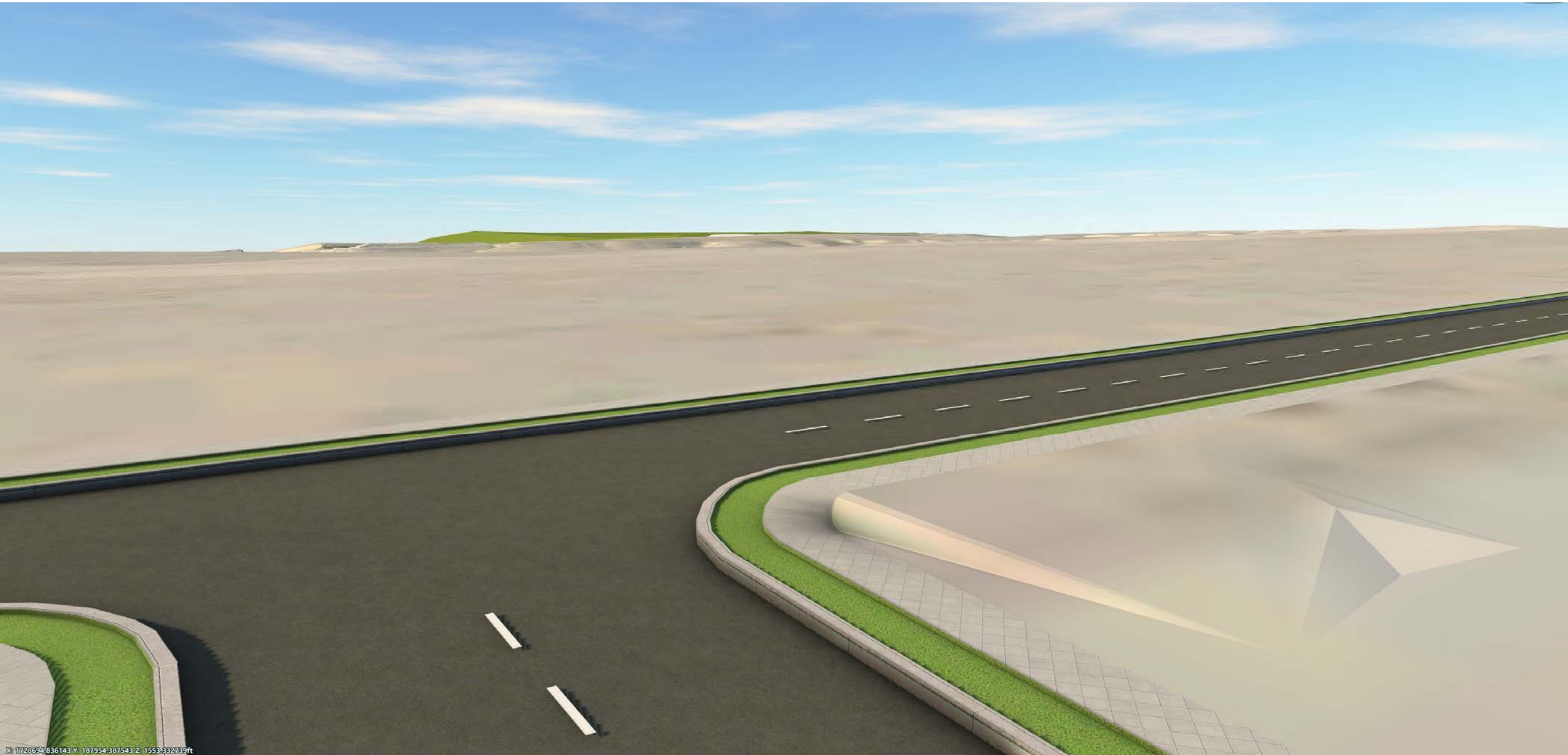
VIEWPOINT 3 – EXISTING CONDITIONS

VIEW LOOKING SOUTH WEST FROM THE INTERSECTION OF SIX PRONG ROAD AND WHITMORE ROAD



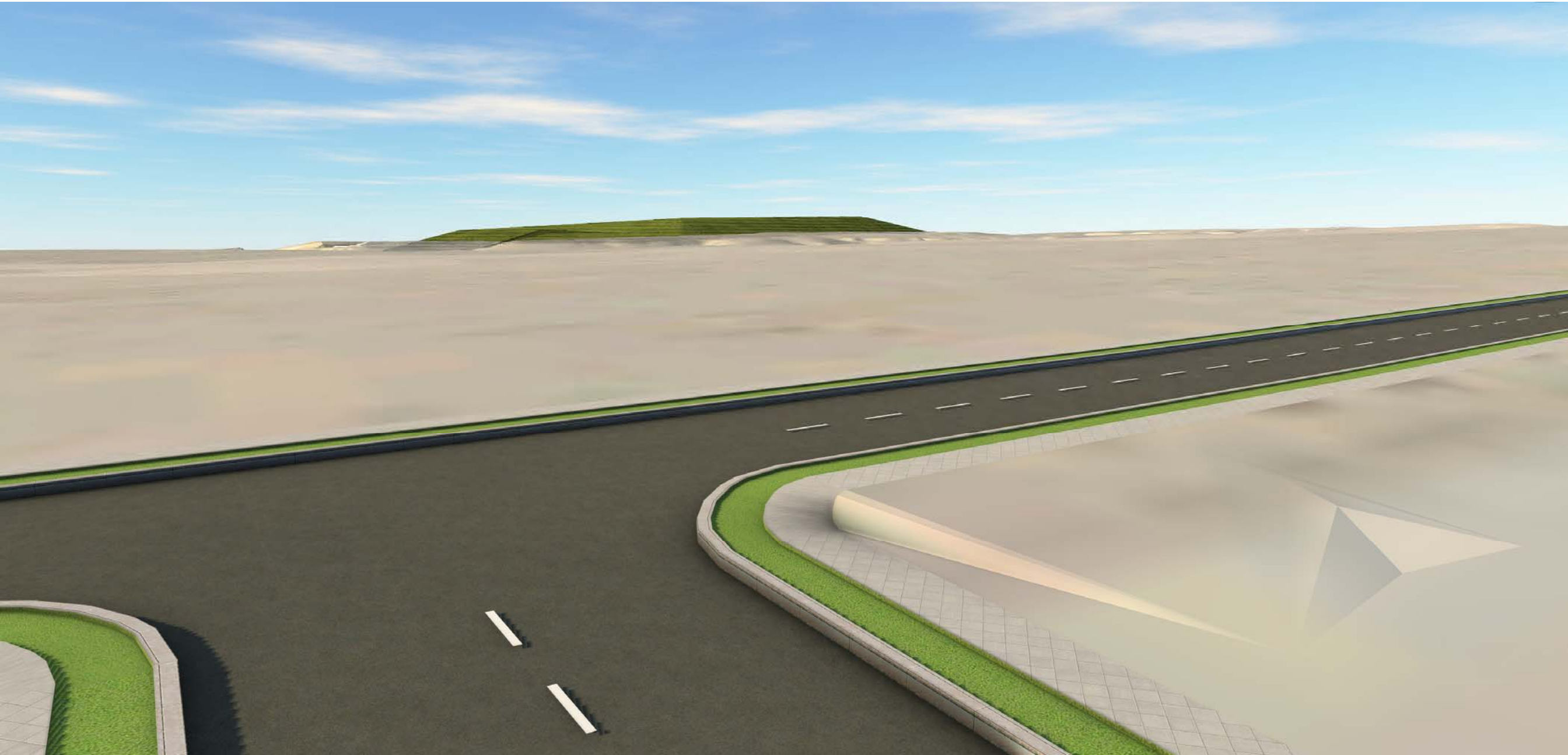
VIEWPOINT 3 – NO ACTION ALTERNATIVE

VIEW LOOKING SOUTH WEST FROM THE INTERSECTION OF SIX PRONG ROAD AND WHITMORE ROAD



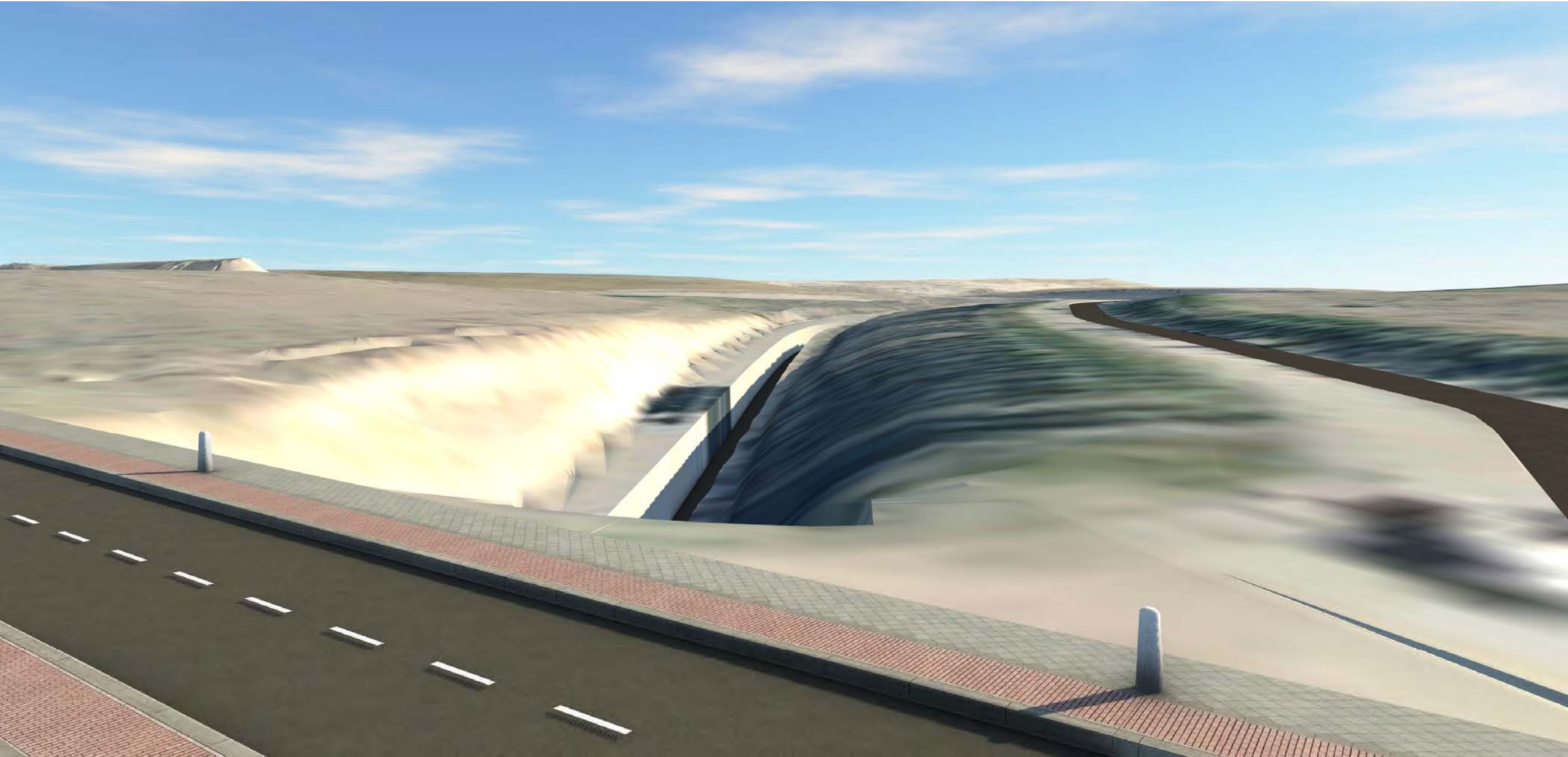
VIEWPOINT 3 – PROPOSED ACTION ALTERNATIVE

VIEW LOOKING SOUTH WEST FROM THE INTERSECTION OF SIX PRONG ROAD AND WHITMORE ROAD



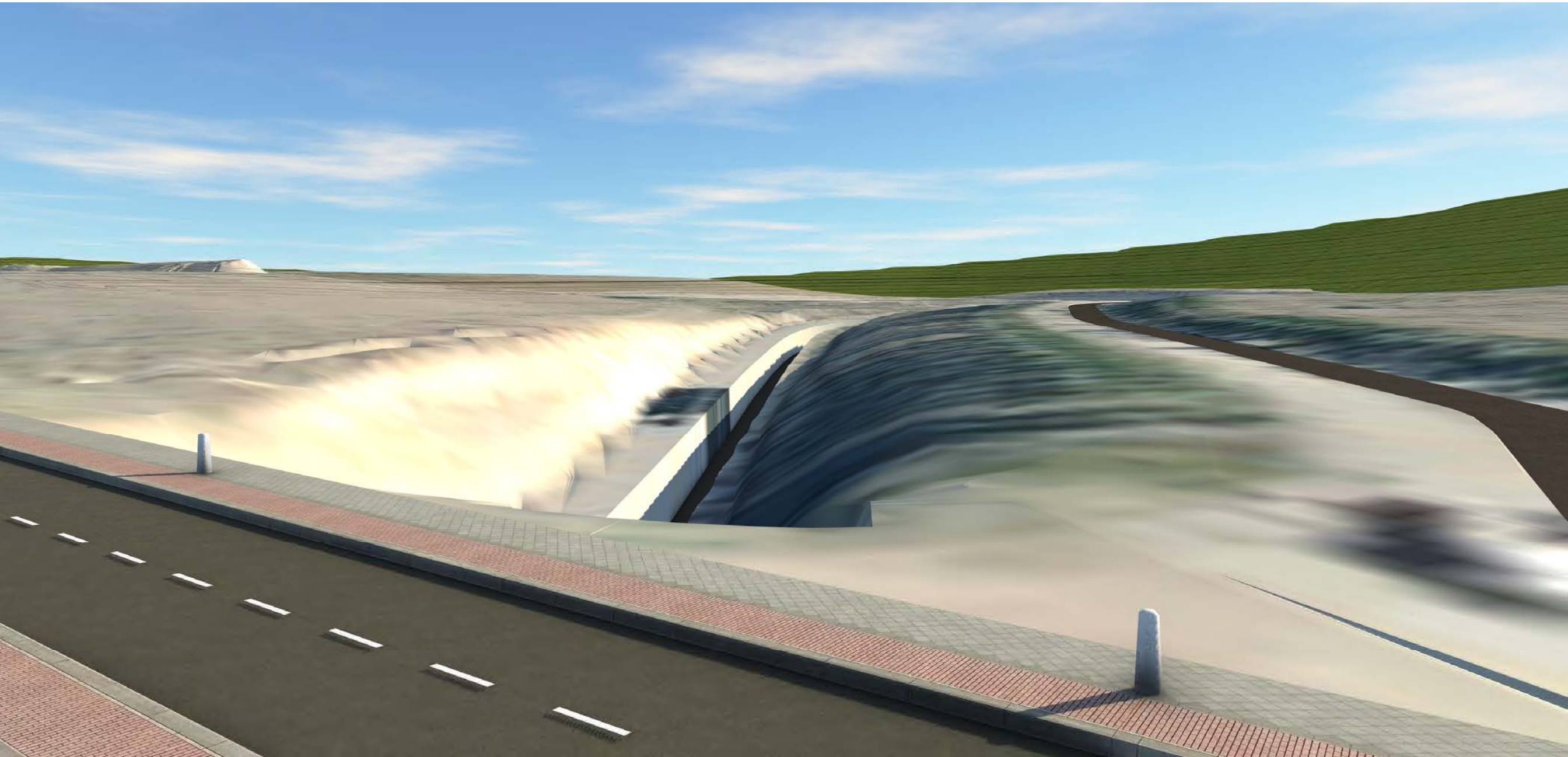
VIEWPOINT 4 – EXISTING CONDITIONS

VIEW LOOKING NORTH EAST FROM THE INTERSECTION OF EAST ROAD AND THE FACILITY ENTRANCE



VIEWPOINT 4 – NO ACTION ALTERNATIVE

VIEW LOOKING NORTH EAST FROM THE INTERSECTION OF EAST ROAD AND THE FACILITY ENTRANCE



VIEWPOINT 4 – PROPOSED ACTION ALTERNATIVE

VIEW LOOKING NORTH EAST FROM THE INTERSECTION OF EAST ROAD AND THE FACILITY ENTRANCE

