

Jeff,

Below is the initial review of the SCS Work Plan that you requested. This reflects my input and that of John Novak. After a first read of the Work Plan, we agreed that engaging the Expert Panel for a detailed review was not necessary for an initial review.

Let me know if you have any questions or wish to discuss further. I would be glad to schedule a time with you to consider how best to involve the Expert Panel going forward.

Regards,
Mark

Initial Review:

The SCS Work Plan reflects the recommendations of the Expert Panel Report (Report) with a few notable exceptions described below. The work plan provides a reasonable and understandable framework for recommended actions and time frame for implementation. The level of detail provided is not consistent and varies from section to section. For example, the description of temperature measurement systems and discussion of the best approach is detailed whereas some sections lack this same depth.

The delineation of Action Items using three timeframe categories is useful. SCS should clarify if the timeframe refers to when the action will start or the duration through which the proposed approach will be employed. "Immediate" implies that a strategy will occur within 90-180 days (i.e., implemented). Long-term implies a strategy will continue for at least 5 years, but lacks clarity on the timing of implementation.

One example is the apparent discontinuity between stormwater grading (Section 4.5) and installation of temporary geosynthetic cover over the entire site (Section 5.2). Stormwater grading is listed as Short-Term which "*should be completed in conjunction with the temporary geosynthetic cover detailed in Section 5.2*", which implies a start within 180 days. However, the temporary geosynthetic cover is listed as Long-Term.

The need for odor mitigation at the Landfill is self-evident (Recommendation 1 of the Report). The first set of Action Items in Table 1 (Pilot Odor Mitigation System – Section 4.3 and Network Perimeter Odor Mitigation System -- Section 5.3) are listed as Short-Term and Long-Term, respectively. It is reasonable to expect the pilot test will require time and is a necessary precursor to the design and construction of a full-scale system. Contingencies for an alternative approach may be required if the pilot test results are not acceptable. Further, the public will likely question the timeframe and express concern.

The SCS Work Plan reflects the critical urgency for data acquisition designed to diagnose and monitor landfill conditions. These action items are listed as immediate. The process through which data will be analyzed and then utilized for decision-making is unclear. It is recommended that the Expert Panel reconvene to study and discuss the data and trends, assess the condition

of the Landfill, and be provided with an opportunity to recommend next steps including changes in approach.

The Work Plan lacks detail on an approach to water extraction from the Landfill and does not address the need for chemical characterization of the leachate (Recommendation 7 of the Report including Appendix E). The Work Plan should address dewatering goals including target removal flowrates and duration to achieve targets. Water quality of the leachate and treatability concerns may limit the rate of removal from the Landfill. If the local wastewater treatment (WWT) facility cannot accept the leachate, alternatives are potentially cost prohibitive (hauling by truck to more distant WWT facilities or on-site treatment).