1 of 2

JOE B RAMEY, PE & The CAREL CORPORATION

RECEIVED
JAN 20 2021
LAND PROTECTION DIVISION
DEPT. OF ENVIRON. QLTY

January 13, 2021
Project No: 20-12-30

Hillary Young
Land Protection Division
Oklahoma Department of Environmental Quality (ODEQ)
P.O. Box 1677
Oklahoma City, OK 73101-1677

Re: ODEQ Notice of Deficiency Letter Dated December 17, 2020, Tier III Permit Modification, Creek County C&D Landfill; ODEQ Permit 3519020; Creek County

Dear Ms. Young:

This letter is written on behalf of the Creek County C&D Landfill in response to an Oklahoma Department of Environmental Quality (ODEQ) letter dated December 17, 2020. The ODEQ's comment is provided below in italics, with our response immediately following. Revised permit application pages are provided as attachments and where possible, redline/strikeout pages are also provided.

Comment 1.: *The Application states the new cell will be constructed with a hybrid liner, consisting of recompacted clay and in-situ liner in different portions of the expansion area. No details of construction or design drawing were included in the Application for review of this liner system. Please update the Application to include this information, including relevant design drawing in accordance with OAC 252:515-3-57.*

Response: A small portion of the western slope of the expansion area will require earth fill. This portion of the cell will be lined with a three foot thick clay liner. The remaindered of the expansion area is intended to be lined with an in-situ liner. Drawings 5 has been revised to illustrate the limits of the clay liner. A note has also been added to Drawing 5 indicating that the remainder of the expansion area is anticipated to be lined by and in-situ liner. Details for the clay liner and in-situ liner are provided on Drawing 8. A revised version of Drawing 5 is provided in Attachment 1.

Comment 2.: *The Application references a Drawing 5C as showing the in-situ and recompacted clay portions of the liner. This Drawing was not included in the Application submitted.*

Response: The references to Drawing 5C on pages 23 and 24 of the application are typographical errors. The correct reference is Drawing 5. Replacement pages with the correct reference is provided in Attachment 2.

136 Pecan Street, Keller, Texas 76248
Telephone: 817.337.0112 • Facsimile: 817.337.0041

Comment 3.: *The cross sections on Drawing 8 of Appendix D show the in-situ liner as 5 feet thick. It should be 15 feet in thickness.*

Response: It is the applicant's understanding that in-situ liners are not required to be fifteen feet thick, rather they are required to provide fifteen feet of separation from the highest groundwater elevation. OAC 252:515-11-71(a)(1) states that in-situ liners installed at a C&D landfills must be at least five feet thick with a hydraulic conductivity no greater than 1.0 x 10 cm/sec. OAC 252:515-11-3 (b) states "C&D landfills utilizing an in-situ liner shall be designed to maintain a minimum fifteen-foot vertical separation between the highest groundwater elevation and the lowermost surface on which waste will be placed." It is noted that a minimum fifteen feet of separation is provided as demonstrated by the isopach map, Drawing 5B.

Comment 4.: *The approved drilling plan specified three (3) borings would be logged by geophysical means and the results submitted with Tier III application. Review of the Application found no logs from the borings made within the area of expansion. Please update the Application to include these logs.*

Response: Piezometers BPZ14-1, BPZ14-3 and BPZ14-5 have been logged using gamma ray and neutron geophysical tools per OAC 252:515-7-34(c)(1). Copies of the logs are provided in Attachment 3.

Comment 5.: *The cost estimates for closure and post closure submitted in the Application do not include the area to be permitted with this Application.*

Response: The closure and post closure cost estimates have been updated to include the expansion area and are provided in Attachment 4. It is noted that the linear footages for the future groundwater monitoring wells and gas monitoring probes are estimated as the wells and probes have not yet been installed. Further, it is the applicant's understanding that these cost estimates are provided for informational purposes and that financial assurance does not need to be increased until new areas of the facility have been developed.

Comment 6.: *There are several places in the application where the legal location is in error. In Section 4.1, the metes and bounds description is missing a few legs. Refer to the warranty deed for correct description. Reference to the expansion as being in the SW/C NW/4 of 28-T18N-R12E is shown in the permit Application cover page and several places in the temporary easement to DEQ. This should be SE/4 NW/4. Also please show the legal location of the borrow area as the same as for Tract 1 if it is within the expansion area of the actual legal description for Tract 2 if it is outside the expansion area.*

Response: The metes and bounds description in Section 4.1 has been corrected. The corrected page (page 5) is provided in Attachment 5. Note the following page (page 6) is also provided in order to maintain proper pagination. Additionally, the location description on the permit application and the temporary easement have been corrected to reference the SE/4 NW/4 of 28 T18N, R12E. The corrected pages are provided in Attachments 6 and 7, respectively.

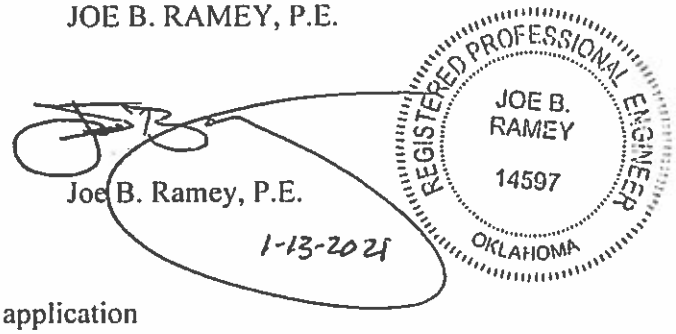
We trust this information is acceptable. If you have any questions, please do not hesitate to call Mr. Danny Rosencutter at 918-299-3755.

Sincerely,

THE CAREL CORPORATION

Kevin T. Carel, P.G.

JOE B. RAMEY, P.E.



Joe B. Ramey, P.E.

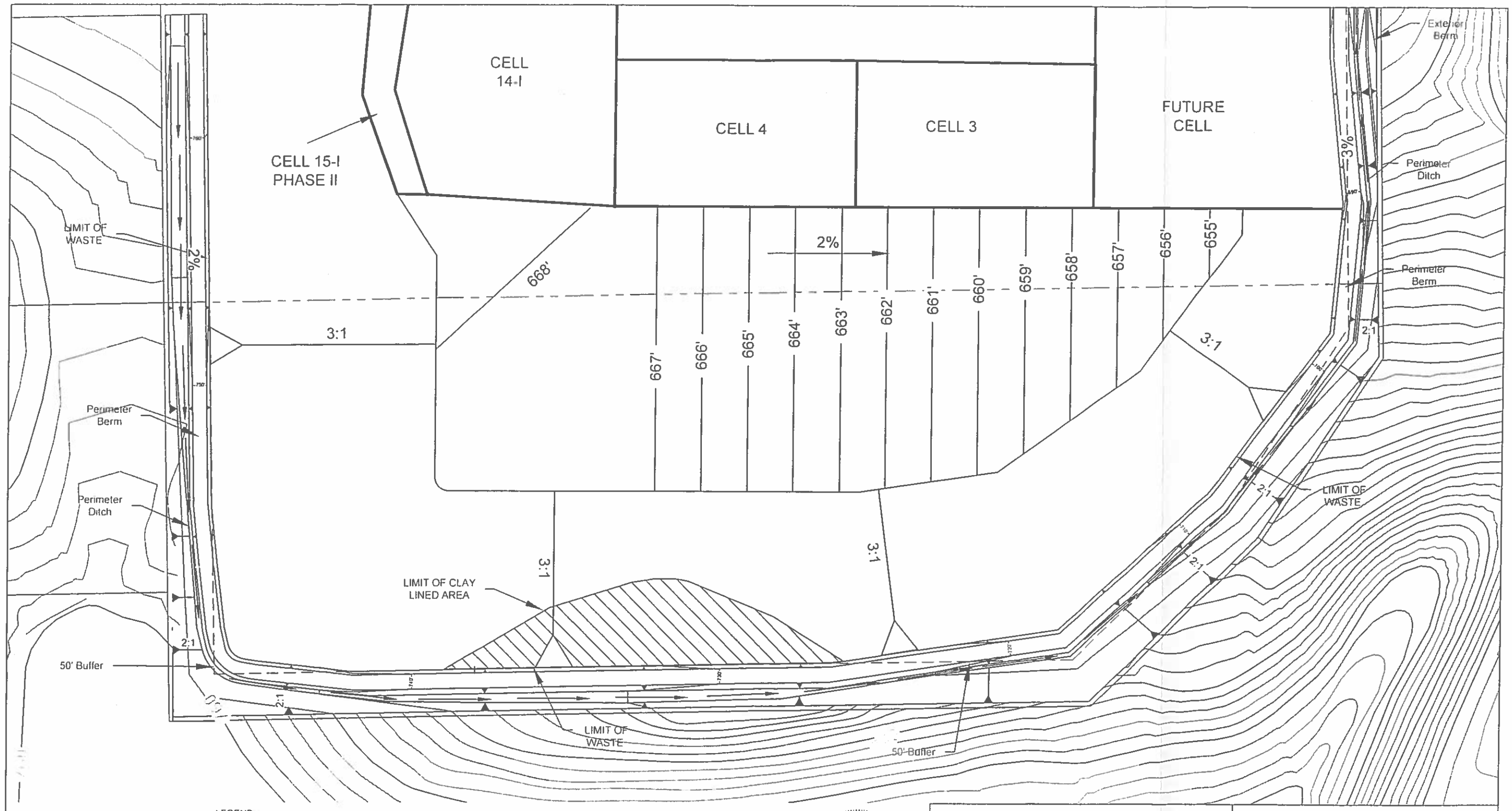
1-13-2020

1. Revised Drawing 5
2. Revised Pages 23 and 24 of the permit application
3. Geophysical Logs for BPZ14-1, BPZ14-3 and BPZ14-5
4. Updated Closure and Post Closure Cost Estimates
5. Revised Metes and Bounds Description
6. Revised Permit Application Page with Corrected Legal Description
7. Revised Temporary Easement with Corrected Legal Description

cc: Danny Rosencutter – Creek County C&D Landfill

ATTACHMENT 1

REVISED DRAWING 5



N

SCALE: 0 50 100 FEET

LEGEND
- PROPERTY BOUNDARY
- DITCH FLOWLINE
- POTENTIOMETRIC CONTOUR
- EXISTING MONITOR WELL TO BE PLUGGED
- BORING
- PIEZOMETER

NOTES
1. Survey information provided by Pennco Engineering & Surveying
2. Topography provided by U S Geological Survey, National Geospatial Technical Operations Center, 2012
3. An in-situ liner is anticipated for the entire expansion area except for the small area to be lined with a 3 foot thick clay liner depicted.

REGISTERED PROFESSIONAL ENGINEER JOE B RAMEY 14597 OKLAHOMA
1-13-2021

JOE B. RAMEY, P.E.

The CAREL CORPORATION
136 Pecan Street, Keller, TX 76248

EXCAVATION PLAN AND TOP OF IN-SITU LINER

CREEK COUNTY LANDFILL
SAPULPA, OKLAHOMA

DATE DRAFTED JAN 5 2020

DRAWING 5

ATTACHMENT 2

REVISED PAGES 23 AND 24 OF THE PERMIT APPLICATION

9 LINER DESIGN

As required by 252:515-11-2(a), waste disposal areas of new C&D landfills and expansions of waste disposal areas of existing C&D landfills are required, at a minimum, to be constructed with either a reconstructed clay liner meeting the requirements of Part 3 of OAC 252:515-11 or an in-situ liner meeting the requirements of Part 9 OAC 252:515-11. This section outlines the liner system proposed by the Creek County Landfill for this Tier III Permit Application.

9.1 252:515-11-3 Separation from Groundwater

OAC 252:515-11-3 requires C&D landfills utilizing an in-situ liner to be designed to maintain a minimum 15-foot vertical separation between the highest groundwater elevation and the lowermost surface on which waste will be placed. If a clay liner is used, the top of the clay liner is to be designed to maintain more than a five foot vertical separation between the highest groundwater elevation and the lowermost surface on which waste will be placed. The Creek County Expansion proposes to utilize in-situ liners. The base of the expansion area is designed to be at least 15 feet the highest groundwater elevation and the lowermost surface on which waste, which is demonstrated on Drawing No. 5C in Appendix D.

9.2 252:515-11-4(a) Quality Assurance/Quality Control (QA/QC) Plan

As required by 252:515-11-4(a), a Quality Assurance/Quality Control (QA/QC) Plan is required to demonstrate that the liner system will be constructed in accordance with the design as outlined in this Section. See Appendix H for the QA/QC Plan.

9.3 252:515-11-4(a)(1) QA/QC Plan Technical Information

The QA/QC Plan in Appendix H complies with 252:515-11-4.

9.4 252:515-11-5 Notification of Construction

As required by 252:515-11-5, the ODEQ will be notified at least two (2) weeks in advance of any liner construction that will be completed at the Creek County Landfill.

9.5 252:515-11-6 Liner Installation and Testing (LIT) Report

A Liner Installation and Testing (LIT) Report will be submitted to the ODEQ at the end of any cell construction to document that the liner system was installed in accordance with ODEQ requirements. The LIT Report will contain, at a minimum, the following:

- Summaries of all construction activities;

- Testing data sheets and summaries;
- Changes from design and material specifications; and
- All QA/QC documentation.

9.6 252:515-11-7 ODEQ Authorization Required

As required by 252:515-11-7, no waste will be placed on the newly constructed liner until it is authorized by the ODEQ.

9.7 252:515-11-31(b) Liner Construction Standards

As demonstrated on Drawing No. 5C in Appendix D, the in-situ liner will be at least 15-feet thick and will have a hydraulic conductivity of less than or equal to 1×10^{-5} cm/sec. A small area of earth fill will occur along the western slope of the expansion area. The upper 3-feet of the fill will be constructed in accordance with the QA/QC Plan in Appendix H and will have a hydraulic conductivity of less than or equal to 1×10^{-5} cm/sec. If, for any reason, a clay liner is required for other areas, it will also be constructed 3-feet thick, have a hydraulic conductivity of less than or equal to 1×10^{-5} cm/sec. and constructed in accordance with the QA/QC Plan in Appendix H.

9.8 252:515-11-32 Preconstruction Tests

As demonstrated in the Soil Report in Appendix G, all of the tests listed below were completed on soil found at the Creek County Landfill that would be suitable for clay liner.

- Soil Classification (ASTM D2487);
- Particle Size Analysis of Soil (ASTM D422);
- Sieve analysis of the following screens: #4, #10, #40, #200;
- Percent Fines (#200 sieve) (ASTM D1140);
- Atterberg limits (ASTM D4318);
- Moisture Content (ASTM D2216 or ASTM D4643);
- Moisture-Density Relationship (ASTM D698 to ASTM D1557); and
- Hydraulic Conductivity (ASTM D5084).

The QA/QC Plan also indicates that the above referenced tests will be completed again prior to construction of any cell at the Creek County Landfill. The sampling frequency shall be one sample per 10,000 cubic yards of soil or as material changes. The test results will be included in the Liner Installation and Testing Report that is required to be submitted to the ODEQ prior to waste acceptance.

9.9 252:515-11-33 Liner Soil Standards

A majority of each test for the following design standards will be met so long as the hydraulic conductivity standard is satisfied:

9 LINER DESIGN

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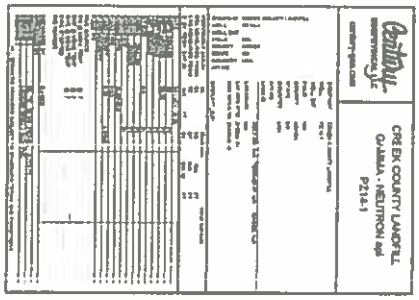
A majority of each test for the following design standards will be met so long as the hydraulic conductivity standard is satisfied:

ATTACHMENT 3
GEOPHYSICAL LOGS FOR BPZ14-1, BPZ14-3 AND BPZ14-5


CRE EK COUNTY LANDFILL
GAMMA - NEUTRON.mpl
PZ14-1


1:120, GAMMA - NEUTRON.mpl PZ14-1 01/11/21
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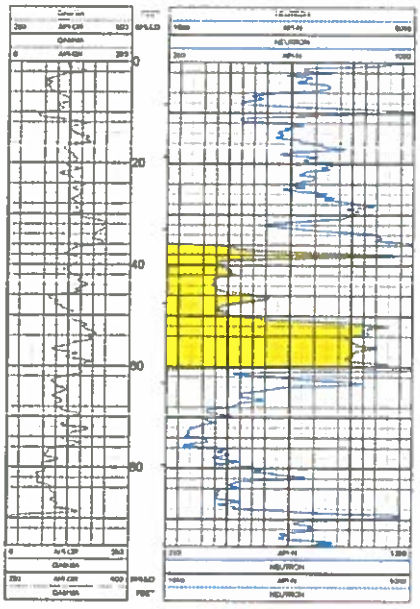
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NEUTRON
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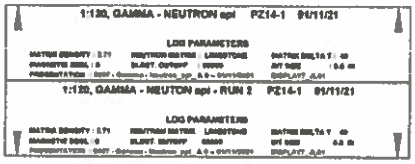
40
60
80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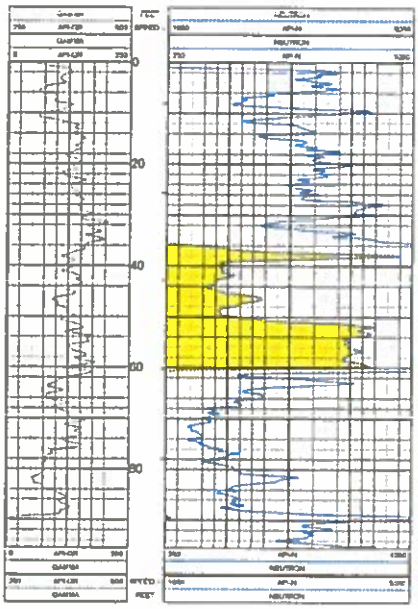
LOG PARAMETERS


GAMMA
NEUTRON
0
20
40
60
80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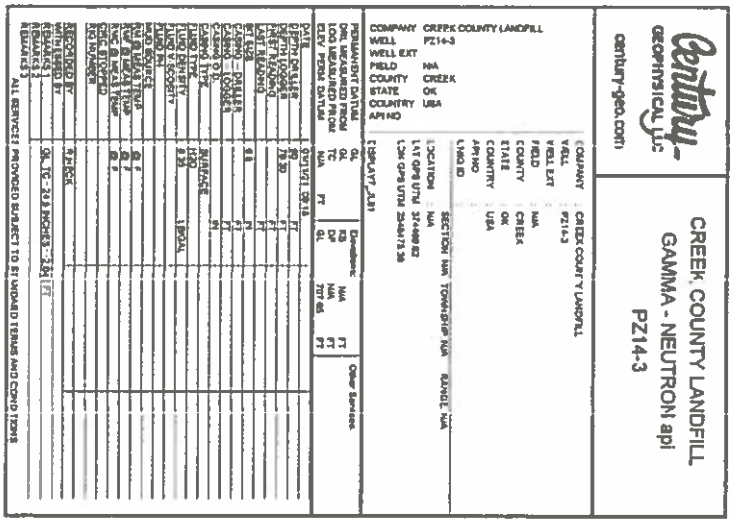
LOG PARAMETERS



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LOG PARAMETERS

MATRIX DENSITY : 2.71	NEUTRON MATRIX : LIMESTONE	MATRIX DELTA T : 49
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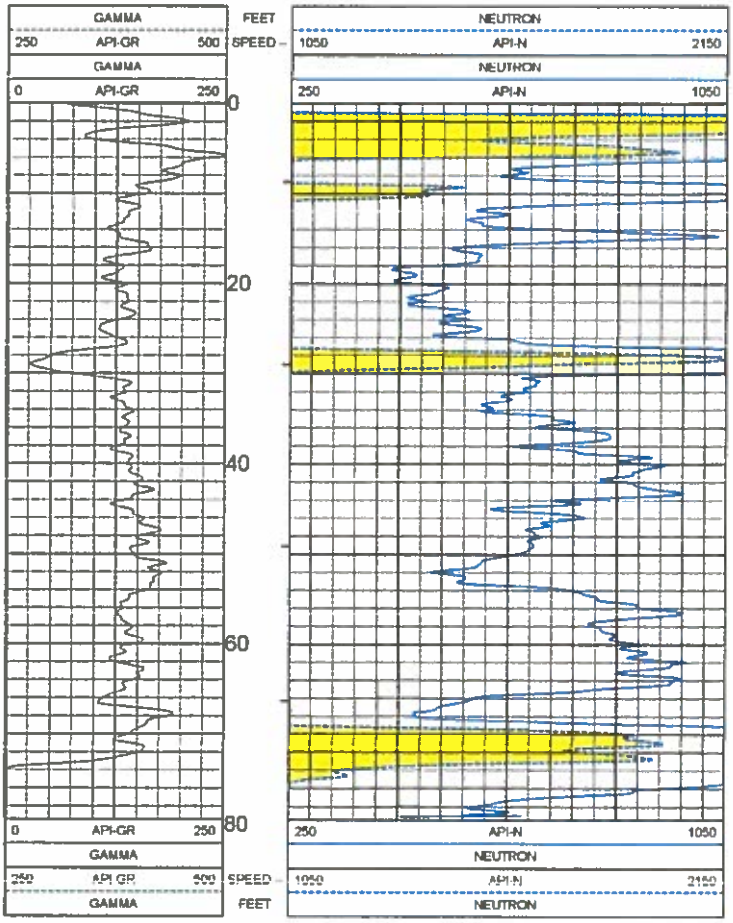
PRESENTATION : 9067 - Gamma - Neutron_api_ A.0 – 01/11/2021		DISPLAY7_JL01



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LOG PARAMETERS

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MAGNETIC DECL : 0	ELECT. CUTOFF : 99999	BIT SIZE : 6.5 IN
PRESENTATION : 9067 - Gamma - Neutron_api_ A.0 – 01/11/2021		DISPLAY7_JL01

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TOOL 9067A TM VERSION 2002
SERIAL NUMBER 629

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2	Jan08,21	10:06:08	NEUTRON	[CPS]	Default	271.000	Default	62.000

Century GEOPHYSICAL LLC
century-geo.com

CREEK COUNTY LANDFILL
GAMMA - NEUTRON api
PZ14-5

COMPANY	CREEK COUNTY LANDFILL
WELL	PZ14-5
WELL EXT	
FIELD	NA
COUNTY	CREEK
STATE	OK
COUNTRY	USA
API NO.	
UWID ID	

SECTION: NA TOWNSHIP: NA RANGE: NA
LOCATION: NA
LAT GPS UTM: 274148.09
LON GPS UTM: 3948236.86
DISPLAY7_JL61

		Elevations			Other Services
PERMANENT DATUM	G.L.	KB	NA	FT	
DRL MEASURED FROM	G.L.	DF	NA	FT	
LOG MEASURED FROM	G.L.	GL	734.38	FT	
ELEV. PERM. DATUM	G.L. FT				

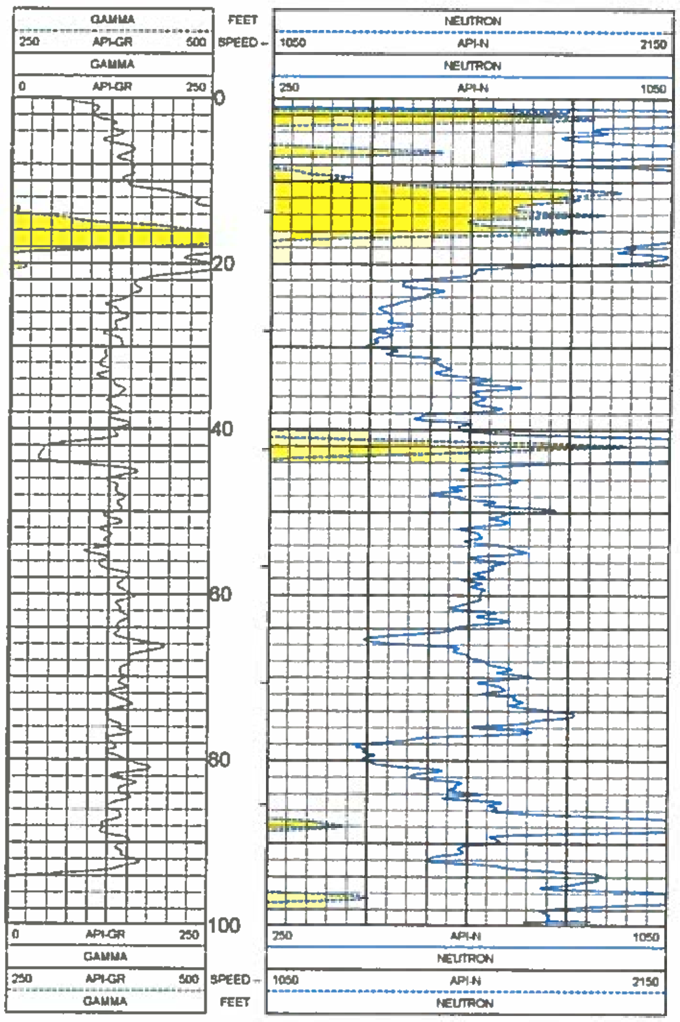
DATE	01/11/21 09:01	
DEPTH DRILLER	110	FT
DEPTH LOGGER	99.73	FT
FIRST READING		FT
LAST READING		FT
BIT SIZE	6.5	IN
CASING - DRILLER		FT
CASING - LOGGER		FT
CASING O.D.		IN
CASING TYPE	SURFACE	
FLUID TYPE	H2O	
FLUID DENSITY	8.33	LB/GAL
FLUID VISCOSITY		
FLUID PH		
MUD SOURCE		
RM @ MEAS TEMP	@ 1 F	
RMF @ MEAS TEMP	@ 1 F	
RMC @ MEAS TEMP	@ 1 F	
CIRC STOPPED		
TRUCK NUMBER		
RECORDED BY	J HECK	
WITNESSED BY		
REMARKS 1	G.L. TC = 28 INCHES = 2.10 FT	
REMARKS 2	LOGGED THRU 2 INCH PVC	
REMARKS 3		

ALL SERVICES PROVIDED SUBJECT TO STANDARD TERMS AND CONDITIONS

1:120, GAMMA - NEUTRON api PZ14-5 01/11/21

LOG PARAMETERS

MATRIX DENSITY : 2.71 NEUTRON MATRIX : LIMESTONE MATRIX DELTA T : 49
MAGNETIC DECL : 0 ELECT. CUTOFF : 99999 BIT SIZE : 6.5 IN
PRESENTATION : 9067 - Gamma - Neutron_api_A.0 – 01/11/2021 DISPLAY7_JL61



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LOG PARAMETERS

MATRIX DENSITY : 2.71 NEUTRON MATRIX : LIMESTONE MATRIX DELTA T : 49
MAGNETIC DECL : 0 ELECT. CUTOFF : 99999 BIT SIZE : 6.5 IN
PRESENTATION : 9067 - Gamma - Neutron_api_A.0 – 01/11/2021 DISPLAY7_JL61

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2	Jan08,21	10:06:09	NEUTRON	[CPS]	Default	271.000	Default	62.000

ATTACHMENT 4
UPDATED CLOSURE AND POST CLOSURE COST ESTIMATES

Table H.1 Site Data
Facility Name: Creek County Landfill
Permit Number: 3519020

Descrption	Quantity	Units
Total Permitted Area	75.5	acres
Active Portion		
Compsite Lined	0.0	acres
Soil Lined	13.71	acres
Area of Largest Cell/Phase Requiring Final Cap		
Composite Lined	0.0	acres
Soil Lined	21.81	acres
Perimeter Fencing	2,000.0	linear feet
Groundwater Monitoring Wells	250.0	VLF
Methane Gas Probes	210.0	VLF
Terraces	1,000.0	linear feet
Letdown Channels	100.0	linear feet
Perimeter Drainage Ditches	2,200.0	linear feet
Average Daily Waste Flow	200.0	tons/day
Landfill Disposal Cost	$1.25	$/ton

VLF = Vertical Linear Feet. The sum of the depths of all monitoring wells.

Closure Cost Estimate
Facility Name: Creek County Landfill

	Task/Service	Quantity	Units	Mutiplier	Unit Cost	Subtotal
1	**PRELIMINARY SITE WORK**					
1.1	Conduct Site Evaluation	1	Lump Sum	1	$3,744.68	$3,744.68
1.2	Dispose Final Waste					
	Average Daily Flow	200.0	tons/day			
	Disposal Cost	200.0	tons/day	5	$1.25	$1,250.00
1.3	Remove Temporary Buildings(s)	1	Lump Sum	1	$3,433.89	$3,433.89
1.4	Remove Equipment	1	Lump Sum	1	$2,803.05	$2,803.05
1.5	Repair/Replace Perimeter Fencing	2,000	Linear Feet	0.25	$3.68	$1,840.00
1.6	Clean Leachate Line(s)	0	Lump Sum	1	$1,696.07	$0.00
2	**MONITORING EQUIPMENT**					
2.1	Rework/Replace Monitring Well(s)	250.0	VLF	0.25	$78.74	$4,921.25
2.2	Plug Abandoned Monitring Well(s)	250.0	VLF	0.25	$31.52	$1,970.00
2.3	Rework/Replace Methane Probe(s)	210.0	VLF	0.25	$68.01	$3,570.53
2.4	Plug Abandoned Methane Probe(s)	210.0	VLF	0.25	$24.85	$1,304.63
2.5	Rework/Replace Remediation and/or Gas Control System	0	Lump Sum	0.05	$0.00	$0.00
3	**CONSTRUCTION**					
3.1	Complete Site Grading	22.21	Acres	1	$1,484.67	$32,974.52
3.2	Construct Final Cap					
	Compacted On-Site Clay or	71,664	Cubic Yards	1	$5.34	$382,685.76
	Compacted Off-Site Clay or	0	Cubic Yards	1	$8.67	$0.00
	Install Geosynthetic Clay Liner Cap	0	Square Feet	1	$0.56	$0.00
3.3	Construct Landfill Gas Venting Layer					
	Place Sand or		Acres	1	$39,698.53	$0.00
	Install Net and Geotextile	0	Square Feet	1	$0.39	$0.00
3.4	Install Passive Landfill Gas Vents	0	Acres	1	$951.03	$0.00
3.5	Install Flexible Membrane Liner	0	Square Feet	1	$0.43	$0.00

Closure Cost Estimate
Facility Name: Creek County Landfill

	Task/Service	Quantity	Units	Mutiplier	Unit Cost	Subtotal
3.6	Drainage layer					
	Place Sand or		Acres	1	$39,698.53	$0.00
	Install Net and Geonet	0	Square Feet	1	$0.39	$0.00
3.7	Place On-Site Topsoil	35,832	Cubic Yards	1	$2.29	$82,055.28
	Place Off-Site Topsoil		Cubic Yards	1	$18.35	$0.00
3.8	Establish Vegetative Cover, Including On- and Off-Site Borrow Areas	24.7	Acres	1	$1,058.09	$26,134.82
4	**DRAINAGE/EROSION CONTROL**					
4.1	Construct Terraces	1,000	Linear Feet	1	$9.61	$9,610.00
4.2	Construct Letdown Channels	100	Linear Feet	1	$105.11	$10,511.00
4.3	Clean Perimeter Drainage Ditches	2,200	Linear Feet	0.5	$7.32	$8,052.00
5	**TASK NOT IDENTIFIED**					
6	**SUBTOTAL**					$576,861.40
7	**ADMINISTRATIVE SERVICES**	1	Lump Sum	0.1	$576,861.40	$57,686.14
8	**TECHNICAL and PROFESSIONAL SERVICES**	1	Lump Sum	0.12	$576,861.40	$69,223.37
9	**CLOSURE CONTINGENCY**	1	Lump Sum	0.1	$576,861.40	$57,686.14
10	**TOTAL FINAL CLOSURE**					$761,457.05

Post-Closure Cost Estimate
Facility Name: Creek County Landfill

	Task/Service	Quantity	Units	Mutiplier	Unit Cost	Subtotal
1	**SITE MAINTENANCE**					
1.1	Site Inspections	4	per year	8	$681.20	$21,798.40
1.2	General Maintenance	1	per year	8	$2,042.28	$16,338.24
1.3	Remediation and/or Gas Control Equipment	1	Lump Sum	0.3	$0.00	$0.00
2	**MONITORING EQUIPMENT**					
2.1	Rework/Replace Monitoring Well(s)	250.0	VLF	0.25	$78.74	$4,921.25
2.2	Plug Abandoned Monitoring Well(s)	250.0	VLF	0.25	$31.52	$1,970.00
2.3	Final Plugging of Monitoring Well(s)	250.0	VLF	1	$31.52	$7,880.00
2.4	Rework/Replace Methane Probe(s)	210.0	VLF	0.25	$68.01	$3,570.53
2.5	Plug Abandoned Methane Probe(s)	210.0	VLF	0.25	$24.85	$1,304.63
2.6	Final Plugging of Methane Probe(s)	210.0	VLF	1	$24.85	$5,218.50
2.7	Final Plugging of Piezometer(s)	0.0	VLF	1	$24.85	$0.00
3	**SAMPLING and ANALYSIS**					
3.1	Groundwater Monitoring Wells	8	Wells	16	$734.52	$94,018.56
3.2	Methane Gas Probes	13	Probes	32	$47.66	$19,826.56
3.3	Surface Water Monitoring Points	2	Points	8	$88.52	$1,416.32
d	Leachate	0	Sample	16	$142.64	$0.00
4	**FINAL COVER MAINTENANCE**					
4.1	Mow and Fertilize Vegetative Cover	42.5	Acres	8	$225.35	$76,619.00
4.2	Repair Erosion, Settlement, and Subsidence for On-Site Soils	42.5	Acres	16	$3.27	$2,223.60
4.3	Repair Erosion, Settlement, and Subsidence for Off-Site Soils	0	Acres	8	$19.54	$0.00
4.4	Re-Seed Vegetative Cover	42.5	Acres	0.2	$1,058.09	$8,993.77

Post-Closure Cost Estimate
Facility Name: Idabel Landfill

	Task/Service	Quantity	Units	Mutiplier	Unit Cost	Subtotal
5	LEACHATE MANAGEMENT					
5.1	Clean Leachate Line(s)	0	Per Year	8	$1,746.78	$0.00
5.2	Maintain Leachate Collection System and equipment	0	Per Year	8	$2,713.69	$0.00
5.3	Collect, Treat, Transport and Dispose Leachate	0	Gallons/Year	8	$0.35	$0.00
6	TASK NOT IDENTIFIED					
7	SUBTOTAL					$266,099.35
8	ADMINISTRATIVE SERVICES	1	Lump Sum	0.06	$266,099.35	$15,965.96
9	TECHNICAL and PROFESSIONAL SERVICES	1	Lump Sum	0.07	$266,099.35	$18,626.95
10	POST-CLOSURE CONTINGENCY	1	Lump Sum	0.1	$266,099.35	$26,609.93
11	TOTAL FINAL POST-CLOSURE					$327,302.19

ATTACHMENT 5

REVISED METES AND BOUNDS DESCRIPTION

4 GENERAL INFORMATION

4.1 252:515-3-36(c) Permit Modification Applications

As required by 252:515-3-36(c), applications for modification to an existing permit shall submit information identified in 252:515-3-36(a) related to the proposed modification.

Facility Owner:	Rosencutter Brothers, Inc. P.O. Box 1597 Sapulpa, OK 74067 Telephone: (918) 299-3755
Contact:	Mr. Danny Rosencutter
Facility Name:	Creek County Landfill
Mailing Address:	P.O. Box 1597 Sapulpa, OK 74067
Physical Address:	10250 South 33rd West Avenue Sapulpa, OK
Disclosure Statement:	Not required
Legal Description:	Beginning at the Southeast Corner of the SE/4 of the NW/4, said point being a 3/8" iron pin found in place, also being the true point of beginning, Thence N 01°03'34"W along the East Line of the SE/4 of the NW4 a distance of 1322.03 feet to the Northeast-Corner thereof, Thence S 88°49'51"W along the North Line of the SE/4 NW/4 a distance of 452.24 feet, Thence S 01°03'34"E parallel to the East line of the SE/4 NW/4 a distance of 101.85 feet, Thence S 44°44'34' E a distance of 254.08 feet, Thence S 56°21'20" E a distance 238.21 feet to a point on the South line of the SE/4 NW/4, Thence N 88°50'35" E along the South line of the SE/4 NW/4 a distance of 80.92 feet to the point of beginning.
Latitudes/Longitudes	The latitude and longitude of the facility entrance and all property corners are illustrated on the Site Plan Drawing 1.
Nearest Town:	Sapulpa, OK
Proposed Operation:	The Tier III modification application proposes to expand the permit boundary of the existing landfill by approximately 12.5 acres. Approximately 9.86 acres of the expanded boundary to be used to

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Latitudes/Longitudes	The latitude and longitude of the facility entrance and all property corners are illustrated on the Site Plan Drawing 1.
Nearest Town:	Sapulpa, OK
Proposed Operation:	The Tier III modification application proposes to expand the permit boundary of the existing landfill by approximately 12.5 acres. Approximately 9.86 acres of the expanded boundary to be used to

	establish, construct, operate, close and monitor during post-closure a construction and demolition waste landfill. The remainder of the area to be used for drainage areas, buffer areas and operational areas.
Anticipated Waste Stream:	The anticipated waste stream will remain the same as before the expansion. Waste will consist of construction and demolition waste collected by the public or by hauling contractors servicing the public and waste resulting from construction activities by private individuals or contractors. Construction and demolition waste created by high winds and natural disasters, including yard waste and tree limbs, will also be accepted. The average amount of waste received by the current landfill over the past 5 years is 58,968.5 tons/year. This receipt rate is anticipated to remain the approximately the same.
Areas Served:	The market for this landfill consists of the City of Sapulpa and the surrounding communities in Creek County.
Estimated Population Served:	The Creek County Landfill accepted 67,019.4 tons in 2019, which is based on a 5 day work week (i.e., 257.77 tons per day). Based on 252:515-3-36(a)(10)(B), the population equivalent has been determined by dividing the anticipated amount of waste received per day by 4.4 pounds per person per day. Therefore, 257.77 tons multiplied by 2000 pounds per ton equals 515,540 pounds per day. Divide by 4.4 pounds per person per day and the population equivalent is 117,168 people.
Road Construction:	The main entrance area around the existing scale and existing scale house is asphalt. The road from the asphalt area to the disposal area is compacted gravel. All weather roads will be constructed around the perimeter of the active waste disposal areas and to the operating face.
Operation Equipment:	The Creek County Landfill site currently uses the following equipment: Cat-D9L bulldozer, Cat-D9R bulldozer, John Deere 700K bulldozer, Cat 350L excavator, Cat 330B excavator, 2-769B off road dump trucks, 2-621B cat scrapers. No changes in equipment are anticipated as a result of this expansion.
Permit Drawings:	See Appendix D.
Location Restrictions:	See Section 6.0 and Appendix E.
Operation Plan:	See Section 13.0.
Stormwater Management:	See Section 12.0 and Appendix J.

ATTACHMENT 6

REVISED PERMIT APPLICATION PAGE WITH CORRECTED LEGAL DESCRIPTION

APPLICATION TO MODIFY FOR A SOLID WASTE DISPOSAL FACILITY PERMIT

Date: **FEBRUARY 26, 2020** County: **CREEK**

Send to:

Solid Waste Permitting Unit
Waste Management Division
Dept. of Environmental Quality
707 N. Robinson (PO Box 1677)
Oklahoma City, OK 73101-1677

FOR DEQ USE

DEQ Log No. _____
No. Copies _____

Date Received: _____

DANNY ROSENCUTTER proposes to establish, construct, operate, and maintain
(Applicant's Name)
the **CREEK COUNTY LANDFILL**, located at
(Facility Name)
10250 S 33RD W Ave Tulsa, OK 74132

(*Exact legal description:*
SE/4 NW/4 28-T-18N-R12E located in Creek County Oklahoma

metes & bounds, platted lot, or land survey. Append extra sheets if necessary)

in **CREEK** County, Oklahoma, and hereby make application for a modification of existing permit **3519020** as required by **Oklahoma Solid Waste Management Act** and Rules pursuant thereto.

Brief description of application: Landfill operations of C&D materials consisting of nonhazardous household trash, construction and demolition debris, yard and green waste, roofing materials and other non-hazardous type waste. This is a modification of the existing landfill.

Applicant or Authorized Agent:

Signature

Danny Rosencutter
Typed Name

Address: **10250 S 33RD W AVE**
City: **JENKS** State: **OK**

Date signed: 2-24-2020

Phone: **918-299-3755**

Preparing Engineer:

Signature

Joe Ramey
Typed Name

Address: **6533 E 11st ST**
City: **TULSA** State: **OK**

Date signed: 2-26-2020

Phone: **918-836-0021**

ATTACHMENT 7

REVISED TEMPORARY EASEMENT WITH CORRECTED LEGAL DESCRIPTION

TEMPORARY EASEMENT FOR ACCESS

Pursuant to the Oklahoma Environmental Quality Code (27A O.S. §2-1-101 *et seq.*, including the Solid Waste Management Act, the rules promulgated thereunder, and in accordance with the conditions and requirements of Permit No. 351920, issued by the Oklahoma State Department of Health, the predecessor in interest to the Oklahoma Department of Environmental Quality (DEQ) on February 19, 2020, Rosencutter Bros, Inc., (his/her heirs and assigns) (its successors and assigns), hereinafter referred to as Grantor, does hereby grant unto the DEQ, including its contractors, employees, and its successors and assigns, the right of access for purposes of performing closure, post-closure monitoring, or corrective action in the event of default by the owner or operator. The Easement is granted over and across the following described land, situated in Creek County, State of Oklahoma:

Tract 1 (the permitted area): (legal description of permitted area), more particularly described as the permitted area of Creek County landfill, Oklahoma Department of Environmental Quality Permit Number 351920; and

Tract 2 (the expansion area) *Legal description of site: 10250 S 33 rd W Avenue, Creek County Oklahoma, SE/4 NW/4 28-T-18N-R12E located in Creek County Oklahoma

This Temporary Easement for Access is given subject to the following conditions:

1. The Grantor hereby grants unto the DEQ an easement and right-of-way over and across Tract 1, above set out, for access to said Tract 1 for the purposes of conducting closure and post-closure activities and/or corrective action as prescribed by the laws of the State of Oklahoma and Rules of the DEQ;

2. The Grantor hereby grants unto the DEQ an easement and right-of-way over and across Tract 2, above set out, for access to said Tract 2 for the purposes of utilizing borrow material while performing closure and post-closure activities and/or corrective action as prescribed by the laws of the State of Oklahoma and Rules of the DEQ;

3. This Easement is temporary and shall become null and void upon certification by the DEQ that post-closure and/or corrective action has been properly completed.

This Easement shall be binding upon the heirs, successors and assigns of the parties hereto.

IN WITNESS WHEREOF, the Grantor has hereunto set (his/her/its) hand this 19th day of February 2020.

Danny Rosencutter, CEO
(Name, Title)