WASTE MANAGEMENT

RIVERBEND LANDFILL CO., INC.
13469 SW Hwy. 18
McMinnville, OR 97128
(503) 472-8788
(503) 434-9770 Fax

November 5, 2008

Western Region Permit Coordinator
DEQ Eugene Office
1102 Lincoln St
Eugene, OR 97401

RE: 1200-Z permit renewal
Riverbend Landfill Company
Yamhill County, Oregon

Permit Coordinator:

Riverbend Landfill Company, Inc. (RLC) recently became aware of a letter sent to your agency by the organization, Willamette Riverkeepers (WR), that provides comments regarding RLC's 1200-Z Industrial Stormwater Permit renewal. WR's letter contains allegations about our site's stormwater program and suggests denying approval of our facility expansion, which we are currently pursuing.

RLC wishes to provide this written response to your agency to address the allegations and misinformation contained in the WR letter.

Background

As you probably know, RLC is a Municipal Solid Waste Landfill, fully-permitted by the Oregon Department of Environmental Quality (DEQ). RLC has been issued a Solid Waste Disposal Permit, Title-V Air Operating Permit, and 1200-Z Industrial Stormwater Permit from DEQ. In conjunction, or in addition, RLC has several environmental programs, policies, and procedures in place to ensure regulatory compliance and protection of human health and the environment. As a Waste Management Company, one of RLC's key commitments is environmental stewardship, which means meeting all regulatory criteria and aligning our environmental priorities with those of our customers, communities, and regulators. RLC is proud to foster and maintain a culture that respects the environment in every business decision.

Stormwater Management

Historically, RLC has implemented a proactive stormwater protection program. An integral part our program is our Stormwater Pollution Control Plan (SWPCP), which contains guidelines and other elements we use consistently and continually. The SWPCP is routinely reviewed and updated in accordance with Condition A.2 of our permit, to reflect significant changes in facility operations, pollution sources, or pollutant types/quantities. We encourage communication of this information among our staff, including educating employees about the contents of the SWPCP, spill prevention, and response measures, good housekeeping procedures, and material management

practices. In conjunction with the above, RLC conducts routine monitoring activities and management of materials and equipment at the facility that have the potential to impact stormwater. We maintain inspection records that document tracking and follow-up procedures to ensure adequate corrective actions have been taken in response to any stormwater issues (see attached summary of benchmark exceedences and documented mitigation measures taken) Finally, RLC consistently utilizes a suite of erosion and sediment control Best Management Practices (BMPs) to help prevent impacts to stormwater.

RLC feels it's important to note that precipitation is managed one of two ways on site, depending on operations. Precipitation that comes into contact with refuse being actively buried is retained and managed as leachate. Leachate is actively collected and pumped into RLC's leachate collection system for subsequent proper management. Precipitation that does not come into contact with refuse being actively buried (non-contact stormwater; water from areas where refuse has been already buried and covered, or other areas where buried refuse does not exist) is actively collected and conveyed to various detention structures/areas to allow for particulate settling and filtering, using accepted BMPs, prior to outfall discharge. RLC maintains ongoing measures in its day-to-day operations to see that both leachate and non-contact stormwater are properly managed and separate to prevent pollution to the non-contact discharge.

Benchmark Exceedences

RLC has experienced periodic exceedences of our permit's E. coli benchmark. Upon occurrence, these exceedences have been investigated (and reported accordingly) to determine the source. We determined the cause to be local wildlife that frequents the site, particularly birds during certain times of the year. There are frequent sightings of seagulls, starlings, waterfowl, deer, turkeys, beavers, and pheasants that frequent the areas surrounding the landfill. RLC has instituted controls for bird populations at the site by incorporating audio deterrents and taking of seagulls under a US Department of Fish and Wildlife depredation permit.

RLC also has experienced exceedences of the benchmark for Total Suspended Solids (TSS). When sampling has indicated an exceedence, RLC has responded and documented with sediment control BMPs depending on the nature of the exceedence. It should be noted that the landfill operations and development are constant and dynamic. Therefore, RLC is always adding sediment control BMPs and adjusting operations to minimize TSS concentrations.

RLC's 1200-Z permit states, "Benchmarks are guideline concentrations, not limitations. They are designed to assist the permittee in determining if the implementation of their SWPCP in reducing pollutant to concentrations below levels of concerns." It should be noted that RCL has not exceeded water quality standards. RLC has exceeded benchmarks and have made and documented appropriate modifications with BMPs consistent with our current permit requirements.

Outfall 4 Location

RLC also disputes the WR allegation the location of our Outfall 4 is not located on RLC's property, but rather on the property of the adjacent landowner. This is entirely false. RLC has had the outfall surveyed to confirm the location and is in fact on RLC property (see attached survey). All site stormwater outfalls are located on RLC property and not on other properties.

Landfill Expansion

Finally, WR's letter also stated that RLC should not be able to expand under its current 1200-Z Industrial Stormwater Permit, due to inadequacies of the previously submitted SWPCP included with our renewal application. RLC's strongly believes there is no connection whatsoever between the DEQ's stormwater and solid waste permitting programs, from the standpoint of expansion approval under the state and federal regulations. As such, we believe the requirements contained in the DEQ-issued Industrial Stormwater permits are irrelevant with regard to facility size. Regardless, RLC will continue to implements continuous and consistent measures to comply with all our permits, including that for stormwater, regardless of the facility size.

In summary, RLC takes its environmental protection responsibility very seriously. We have, and will continue to take proactive approaches for environmental protection with facility operations and development.

Sincerely,

RIVERBEND LANDFILL COMPANY, INC.

George Duvendack

District Manager

copy: Tim Spencer, DEQ
Steve Kraten, METRO

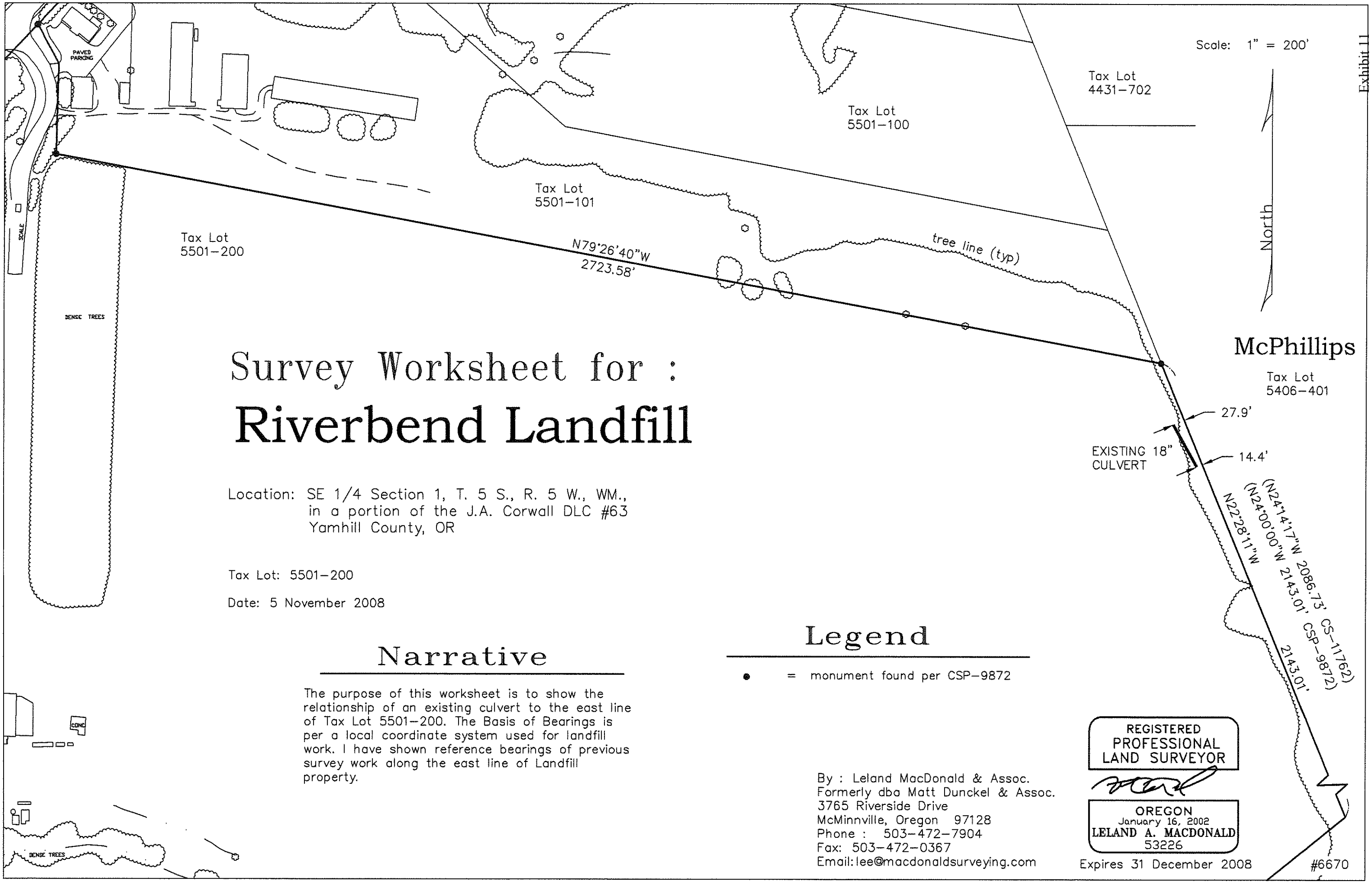
RBLF Stormwater Exceedences Response Summary

Reporting Period		Exceeded Parameter	Exeedence location(s)	BMP/Corrective Action Implemented	Notes
2007/08	Winter (12/18/07)	E. Coli	Outfall No. 2, 6 and 7	RLC reviewed site operations and the RLC SWPCP. RLC increased our activity to control bird populations around the working area, including audio deterrents, and "taking" of Sea-Gulls as allowed under RLC's United States Department of Fish and Wildlife depredation permit. Based on visual observations, these measures were very effective in reducing the number of birds that populated the site. Based on results from samples collected on 03-26-08, these measures were not effective in reducing levels to below benchmark values. Outfall 2, and 4 both exceeded benchmark values but collect only storm water from portions of the site that are under intermediate or final closure.	Discharge from outfall 7 was diverted to flow into outfall 6 in order to better manage this limited flow. Throughout the year RLC inspects and documents the condition of all elements of the storm-water control system. Based on the inspections, any required repairs or actions are made immediately. Throughout the year, RLC inspects and documents the condition of all elements of the storm-water control system. Based on the inspections, any required repairs or actions are made immediately.
		TSS	Outfall No. 2 and 6	As required by our permit, RLC reviewed site operations and the RLC SWPCP. Based on this review RLC implemented additional sediment control measures for areas that discharged to outfall No. 2. These measures included regrading and compacting site access roads, placing straw bales (check dams) in ditch flow lines, and placing additional straw mulch over limited areas that did not have adequate protection to prevent the erosion of soil. Based on visual observations most of the TSS was associated with the roads. In order to better manage TSS associated with outfall No. 7 this flow was diverted to outfall No. 6. This provided additional bio-filtration prior to the discharge. Based on results from samples collected on 03-26-08 and observations these measures effectively reduced the discharge concentrations below the benchmark concentrations.	
	Spring (3/26/2008)	E. Coli	Outfalls 2, 4, and 6.	Based on visual observations and site review of site operations, the elevated e-coli concentrations are attributed to site wildlife and not with site operations. Outfall 2, and 4 both exceeded benchmark values but collect only storm water from portions of the site that are under intermediate or final closure.	
2006/07	Winter (12/14/06)	E. Coli	Outfall No. 2, 6 and 7.	As required by our permit RLC reviewed site operations and the RLC SWPCP. RLC implemented additional measures to control bird populations on-site that tend to gather in the area of waste placement. These measures included full time implementation of audio deterrents, and reducing the size of the waste placement area. Additionally RLC obtained a "depravation" permit from the U.S. Department of Fish and Wildlife that allows a limited taking of Seagulls to control nuisance populations. Based on results from samples collected on 04-9-07 and observations these measures effectively reduced the discharge concentrations below the benchmark levels at all locations except Outfall No. 7.	Outfall locations No. 3 and No. 5 are non-point source discharge locations. Additionally, catch basins that previously drained storm water to Outfall No. 1 were eliminated, eliminating all storm water flow to Outfall No. 1. Throughout the year, RLC inspects and documents the condition of all elements of the storm-water control system. Based on the inspections any required repairs or actions are made immediately.
		TSS	Outfall No. 4 and 7	As required by our permit, RLC reviewed site operations and the RLC SWPCP. Based on this review, RLC implemented additional sediment control measures for areas that discharged to outfall No. 4. These measures included placing straw mulch on slope areas that had been hydro seeded in September to better stabilize soil conditions and diverting the majority of the flow going to outfall No. 4 to outfall No. 6 by installing a pumping system. In order to minimize TSS at outfall No. 7, the drainage area was re-graded and fresh gravel placed in portions of this area, additional straw bale check dams were installed, and traffic in this area was minimized. Based on results from samples collected on 04-9-07 and observations, these measures effectively reduced the discharge concentrations below the benchmark concentrations.	
	Spring (4-9-07)	NONE			
2005/06	Winter (12-2-05)	E. Coli	Outfall No. 2,4,6 and	As required by our permit, RLC reviewed site operations and the RLC SWPCP. RLC implemented significant additional measures to control bird populations on-site that tend to gather in the area of waste placement. These measures included full time implementation audio deterrents, and reducing the size of the waste placement area. Based on results from samples collected on 04-17-06 and observations these measures effectively reduced the discharge concentrations below the benchmark levels at all locations except Outfall No. 4.	Throughout the year RLC inspects and documents the condition of all elements of the storm-water control system. Based on the inspections any required repairs or actions are made immediately.
		TSS	Outfall No. 4 and 7	Measured concentrations were 620 milligrams per liter (mg/l), and 160 mg/l respectively. As required by our permit RLC reviewed site operations and the RLC SWPCP. Based on this review RLC implemented additional sediment control measures for areas that discharged to outfall No. 4, and minimized traffic in the area around outfall No. 7 to minimize impacts. Based on results from samples collected on 04-17-06 and observations these measures effectively reduced the discharge concentrations below the benchmark levels.	
2004/05	Winter (1/12/05)	E. Coli	Outfall No. 1, and 4	As required by our permit, RLC reviewed site operations and the RLC Storm Water Pollution Control Plan (SWPCP). In accordance with our SWPCP, additional samples were collected during separate sampling event on 03-27-05.	E-Coli monitoring is only required for landfills that accept bio-solids. During the 2004-2005 monitoring period RLC accepted 178-tons of bio-solids at the facility. Throughout the year RLC inspects and documents the condition of all elements of the storm-water control system. Based on the inspections, any required repairs or actions are made immediately. Throughout the year, RLC inspects and documents the condition of all elements of the storm-water control system. Based on the inspections, any required repairs or actions are made immediately.
		TSS	Outfall No. 1	As required by our permit, RLC reviewed site operations and the RLC SWPCP. Based on this review, RLC modified the two storm water catch basins that discharge storm water to Outfall No. 1. These modifications included installation of catch basin filter bags and sediment control weirs with graded filters. Additionally, RLC implemented a storm water pumping system to divert storm water into the existing site poplar tree farm area prior to the water draining to the catch basins. This system provided significant natural filtration prior to storm water discharging into the catch basins. Based on sample results and observations, these modifications performed effectively.	
	Spring (3/26/05)	E. Coli	Outfall No. 2, and 7	Sample results for Verification –01 and Verification –02 were 1990 MPN/100ml and 579 MPN/100 ml respectively. Verification –01 and Verification –02 were both collected from areas that are not impacted by landfill waste placement and indicate that the elevated levels are a result of wild life occurring at the facility.	

2003/04	Winter (1/19/04)	E. Coli	Outfall No. 3	As required by our permit, RLC reviewed operations and current stormwater management practices that may impact E-Coli at these outfalls. Based on observations and review of the operations, RLC believes that these elevated E-Coli concentrations were not a direct result of current landfilling activities and do not indicate water is being contaminated by the waste management process. The elevated concentrations were most likely a result of bird populations that fluctuate at the facility based on surrounding climatic conditions and other wildlife that exist at the facility. In order to reduce these values, RLC maintains a significant effort to minimize the bird populations on the site by utilizing "bird cannons", and other devices to discourage birds from inhabiting the working portions of the landfill. Outfall No. 1 does not collect any surface water from portions of the site where waste placement occurs.	Throughout the year, RLC inspects and documents the condition of all elements of the storm-water control system. Based on the inspections, any required repairs or actions are made immediately.
		TSS	Outfall No. 1	As required by our permit, RLC reviewed operations and current storm water management practices that may impact outfall location No. 1. As a result of this review, additional straw bale dams were placed in the storm water drainage ditch along the main site entrance road, additional straw was placed on stockpiled soils, and roads were regraded and compacted. Based on subsequent sampling on 3-25-04, these measures appear to have reduced the TSS concentration at this outfall. Benchmark concentrations for TSS were also exceeded during the 3-25-04 sampling event at outfall No. 2 and 3. Both of these outfalls drain areas that are predominantly covered with temporary plastic and include portions of the main site access road. As required by our permit, RLC has reviewed operations and current storm water management practices. RLC has determined that it may reduce sediment load to outfall No. 2 by placing straw bale check dams in the drainage ditches prior to entering the site storm water sedimentation basin. In order to address TSS concentration benchmark exceedences at outfall No. 3, RLC has revised its road mai that after grading occurs all graded areas are compacted utilizing a smooth drum vibratory roller.	
	Spring (3/25/04)	E. Coli	Outfalls 1, 2, 3, 4, and 5	Based on observations and review of the operations, RLC believes that these elevated E-Coli concentrations were not a direct result of current landfilling activities and do not indicate water is being contaminated by the waste management process. The elevated concentrations were most likely a result of bird populations that fluctuate at the facility based on surrounding climatic conditions and other wildlife that exist at the facility. In order to reduce these values, RLC maintains a significant effort to minimize the bird populations on the site by utilizing "bird cannons", and other devices to discourage birds from inhabiting the working portions of the landfill.	
		TSS	Outfall No. 2 and 3	Both of these outfalls drain areas that are predominantly covered with temporary plastic and include portions of the main site access road. As required by our permit, RLC has reviewed operations and current storm water management practices. RLC has determined that it may reduce sediment load to outfall No. 2 by placing straw bale check dams in the drainage ditches prior to entering the site storm water sedimentation basin. In order to address TSS concentration benchmark exceedences at outfall No. 3, RLC has revised its road maintenance procedures to assure that after grading occurs all graded areas are compacted utilizing a smooth drum vibratory roller.	
2002/03	Winter (1/30/03)	E. Coli	Outfall No. 1, 2, and 4	As required by our permit RLC reviewed operations, and current stormwater management practices that may impact E-Coli at these outfalls. Based on observations, and review of the operations RLC believes that these elevated E-Coli concentrations were not a direct result of current landfilling activities and do not indicate water is being contaminated by the waste management process. The elevated concentrations were most likely a result of bird populations, that fluctuate at the facility based on surrounding climatic conditions and other wildlife that exist at the facility. In order to reduce these values RLC maintains a significant effort to minimize the bird populations on the site by utilizing "bird cannons", and other devices to discourage birds from inhabiting the working portions of the landfill. RLC was effective in minimizing the E-coli concentrations at Outfall No. 2, which currently drains the majority of the facility. Outfall No. 1 does not collect any surface water from portions of the site where waste placement occurs.	Throughout the year RLC inspects and documents the condition of all elements of the storm-water control system. Based on the inspections any required repairs or actions are made immediately.
		TSS	Outfalls 1,2, and 4	As required by our permit and SWPCP these data were reviewed and measures taken to minimize the discharge. These measures included, re-grading roads to remove dirt that had built up as a result of hauling soil material, protecting areas that were not fully vegetated with straw mulch, and placing straw bales in ditch lines to lower the flow velocity, and filter sediment load. Based on the results of the 04-24-03 sampling event, these measures were effective in reducing the sediment load associated with these areas.	
	Spring (4/24/03)	NONE			
2001/02	Winter (1/7/02) Sampling of outfall 2 was delayed due to high water conditions until 1-31-02.	E. Coli	Outfall No. 1, 2, 4, and 5	As required by our permit, RLC reviewed operations and current stormwater management practices that may impact E-Coli at these outfalls. Based on observations and review of the operations, RLC believes that these elevated E-Coli concentrations were not a direct result of current landfilling activities and do not indicate water is being contaminated by the waste management process. The elevated concentrations were most likely a result of significant bird populations that fluctuate at the facility based on surrounding climatic conditions and other wildlife that exist at the facility. In order to reduce these values RLC maintains a significant effort to minimize the bird populations on the site by utilizing "bird cannons" and other devices to discourage birds from inhabiting the working portions of the landfill. During the fall and early winter, bird populations were noted to be higher then normal at the facility. During this period, RLC was not able to utilize tools implemented in the past due to new purchasing regulations for explosive deterrent devices.	During the 2001/2002 monitoring period, surface water diverted to Outfall No. 5 was largely eliminated. This outfall remains in-place as during future site operations more significant portions of the site's surface water may be diverted to this location. Throughout the year, RLC inspects and documents the condition of all elements of the storm-water control system. Based on the inspections, any required repairs or actions are made immediately.
	Spring (5/17/02) Outfall 5 was not sampled during the May sampling event. Based on the current grading configuration of the facility outfall 5 only generates discharge during extreme weather events.	E. Coli	Outfall No. 1, 2, and 4		

2000/01	Winter(1/21/01)	E. Coli	Outfall No. 1, 4 and 5	RLC reviewed operations and current stormwater management practices that may impact E-Coli at these outfalls. Based on observations and review of the operations, RLC believes that these elevated E-Coli concentrations were not a direct result of current landfilling activities and do not indicate water is being contaminated by the waste management process. The elevated concentrations were most likely a result of significant bird populations that fluctuate at the facility based on surrounding climatic conditions and other wildlife that exist at the facility. In order to reduce these values, RLC maintains a significant effort to minimize the bird populations on the site by utilizing "bird cannons" and other devices to discourage birds from inhabiting the working portions of the landfill. Based on site observations, these measures are quite successful, however, bird populations do still exist around the working face and the surrounding areas.	Outfall No. 2 was resampled on 4-30-01 for Total Recoverable Oil and Grease (TO&G) because the sample bottle for the original sample was broken during shipping. Throughout the year RLC inspects and documents the condition of all elements of the storm-water control system. Based on the inspection reports any required repairs or actions are made immediately.
	Spring (4/2/01)	E. Coli	Outfall No. 1 and 4	E-Coli concentrations at Outfall No. 4 decreased between the two sampling events. Based on current site configuration, this outfall does drain areas that are adjacent to waste management activities and indicates that measures taken by RLF between the two sampling events to minimize the population of birds was effective.	
		Total Oil & Grease	Outfall No. 4	As required by our permit, RLC reviewed operations and current stormwater management practices that may impact TO&G at outfall No. 4. Based on operational records and review with site personnel, no significant event was noted. Additionally, no signs of potentially contaminated discharge were noted during routine site inspections. RLC works very diligently to maintain high storm water quality and views this event as being anomalous. To assure the future quality of stormwater discharge in that area, RLC inspected the entire area for potential sources, replaced and installed additional oil sorbent booms, and retrained site personnel.	
		TSS	Outfall No. 1	As required by our permit, RLC reviewed operations and current storm water management practices that may impact TSS at outfall No. 1. Based on operational records and review with site personnel, no significant event was noted. This area does not drain any portion of the site that is directly associated with active waste management activities. It does drain portions of the site that are permanently closed, temporarily closed, site access roads, and areas in agricultural use. Based on site observations, it is most likely that the elevated TSS level is due to fine aggregate material that exists in the gravel site access roads. During the winter months, RLC occasionally re-grades our roads to minimize maintenance on vehicles that deliver waste to our facility. The elevated TSS level is most likely due to the regrading process prior to the sampling event. In an effort to minimize this potential in the future, RLC will work to properly re-compact the roads utilizing a smooth drum roller after the regarding process. This will create a surface that is less likely to discharge fines to outfall No. 1.	
1999/00	Winter (12/10/00)	E. Coli	Outfall No. 1, 2, and 5	As required by our permit RLC reviewed operations, and current stormwater management practices that may impact E-Coli at these outfalls. Based on observations, and review of the operations RLC determined that these elevated E-Coli concentrations were not a result of active landfilling activities. The elevated concentrations were a result of significant bird populations, and other wildlife that exist at the facility. In order to reduce these values RLC increased efforts to reduce bird populations on the site by purchasing and installing additional "bird cannons", and worked to reduce the size of our active working face. These measures significantly reduced the E-Coli concentrations at outfalls No.s 4 and 5, which drain areas, near the working face.	E-Coil concentrations increased slightly at outfall No.s 1 and 2 between the two sampling events. Both of these outfalls do not drain areas associated with active land filling. E-Coil concentrations in these areas are believed to result from wild life that naturally inhabits our facility. Throughout the year RLC inspects and documents the condition of all elements of the storm-water control system. Based on the inspection reports any required repairs or actions are made immediately. Inspection records are maintained at the site available for review upon request.
		Oil & Grease	Outfall No. 2	The measured TO&G concentration was 12.7 mg/l (permit benchmark concentration 10 mg/l). As required by our permit RLC reviewed operations, and current stormwater management practices that may impact TO&G at outfall No. 2. Based on operational records and review with site personnel no significant event was noted. Additionally RLC adjusted storm water drainage, replaced and installed additional oil sorbet booms, and retrained site personnel.	
	Spring (4-13-00, 4-14-00, 4-28-00)	E. Coli	Outfall No. 1 and 2	As required by our permit RLC reviewed operations, and current stormwater management practices that may impact E-Coli at these outfalls. Based on observations, and review of the operations RLC determined that these elevated E-Coli concentrations were not a result of active landfilling activities. The elevated concentrations were a result of significant bird populations, and other wildlife that exist at the facility. In order to reduce these values RLC increased efforts to reduce bird populations on the site by purchasing and installing additional "bird cannons", and worked to reduce the size of our active working face.	
1998/99	Winter (12-10-99)	Total Oil & Grease	Outfall No. 2	The measured TO&G concentration was 12.7 mg/l (permit benchmark concentration 10 mg/l). As required by our permit, RLC reviewed operations and current stormwater management practices that may impact TO&G at outfall No. 2. Based on operational records and review with site personnel, no significant event was noted. Additionally, RLC adjusted storm water drainage, replaced and installed additional oil sorbet booms, and retrained site personnel.	Samples were collected on 12-10-99, 4-13-00, 4-14-00, and 4-28-00.
		E. Coli	Outfall No. 1, 2, and 5	The elevated E-coli concentrations were measured at outfall No. 1, 2 and 5 on 12-10-99, and outfall No. 1, and 2 on 4-28-00. The measured E-Coli concentrations at and 770, and 980 on 4-14-00 (permit benchmark concentration 406 MPN/100ml). As required by our permit, RLC reviewed operations and current stormwater management practices that may impact E-Coli at these outfalls. Based on observations and review of the operations, RLC determined that these elevated E-Coli concentrations were not a result of active landfilling activities. The elevated concentrations were a result of significant bird populations and other wildlife that exist at the facility. In order to reduce these values, RLC increased efforts to reduce bird populations on the site by purchasing and installing additional "bird cannons" and worked to reduce the size of our active working face. These measures significantly reduced the E-Coli concentrations at outfalls No.s 4 and 5, which drain areas near the working face. E-Coli concentrations increased slightly at outfall No.s 1 and 2 between the two sampling events. Both of these outfalls do not drain areas associate with active landfilling. E-Coli concentrations in these areas are believed to result from wildlife that naturally inhabits our facility.	
	Spring (4/14/00; 4/28/00)	E. Coli	Outfall No. 1		

Scale: 1" = 200'



Survey Worksheet for :

Riverbend Landfill

Location: SE 1/4 Section 1, T. 5 S., R. 5 W., WM.,
in a portion of the J.A. Corwall DLC #63
Yamhill County, OR

Tax Lot: 5501–200

Date: 5 November 2008

Narrative

The purpose of this worksheet is to show the relationship of an existing culvert to the east line of Tax Lot 5501–200. The Basis of Bearings is per a local coordinate system used for landfill work. I have shown reference bearings of previous survey work along the east line of Landfill property.

Legend

● = monument found per CSP–9872

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REGISTERED
PROFESSIONAL
LAND SURVEYOR

OREGON
January 16, 2002
LELAND A. MACDONALD
53226

Expires 31 December 2008

WASTE MANAGEMENT

RIVERBEND LANDFILL CO., INC.
13469 SW Hwy. 18
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(503) 472-8788
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December 26, 2008

Mary Stern, Leslie Lewis, and Kathy George
Yamhill County Commissioners
535 NE Fifth Street
McMinnville, OR 97128

RE: Response to Willamette Riverkeeper Letter for Riverbend Landfill Expansion

Dear Yamhill County Commissioners,

Riverbend Landfill Company, Inc. (RLI) wishes to provide this written response to the Yamhill County Commissioners to address the allegations and misinformation contained in a letter submitted by the Northwest Environmental Defense Center (NEDC) and Willamette Riverkeeper (WR) dated October 27, 2008 that provides comments regarding RLI's proposed expansion. WR's letter contains allegations about our site's environmental protection program and suggests denying approval of our proposed facility expansion, which RLI is currently pursuing.

As you probably know, Riverbend Landfill is a Municipal Solid Waste Landfill, fully-permitted by the Oregon Department of Environmental Quality (DEQ). RLI has been issued a Solid Waste Handling Permit, Title-V Air Operating Permit, and 1200-Z Industrial Stormwater Permit from DEQ. In addition, RLI has several environmental programs, policies, and procedures in place to ensure regulatory compliance and protection of human health and the environment. As a Waste Management Company, one of RLI's key commitments is environmental stewardship, which means meeting all regulatory criteria and aligning our environmental priorities with those of our customers, the community, and the regulators. RLI is proud to foster and maintain a culture that respects the environment in every business decision.

With regard to the allegations raised in the WR's October 27, 2008 letter (in bold text), RLI provides the following responses. For reference, all issues presented in the WR's letter are restated below and has been assigned a sequential number.

1. "Because of the degraded water quality in the South Yamhill River, as well as Riverbend's failure to comply with its stormwater Pollution Control Permit, Commentors encourage you to ensure that Riverbend is in full compliance with all state and federal laws regarding water quality before approving such expansion."

Response: RLI is in full compliance with all state and federal laws regarding water quality, including all laws and regulations for Municipal Solid Waste Landfills and our 1200-Z Stormwater Discharge Permit. In addition, we are not aware of the existence of any data indicating that RLI is impacting the South Yamhill River. Data supporting this claim was collected by RLI on May 5, 2008 (Attachment 1), as part of a surface water quality investigation of onsite un-named tributaries that discharge into the South Yamhill River. The testing was conducted at locations both upgradient and downgradient of the

point where facility stormwater enters the tributaries. The samples were tested for parameters consistent with those typically found in landfill leachate. The results of this testing, which were provided to the DEQ, indicate that water quality upgradient and downgradient of the storm water discharge points is consistent, and that the facility does not significantly contribute to pollutant levels of the tributaries by exceeding water quality standards.

2. "Elevated levels of iron & phosphorous, and decreased oxygen are all associated with landfill leachate; these elevated levels in the South Yamhill may be directly related to the Riverbend and/or Whiteson Landfills, and must be a consideration when deciding whether the landfill can expand."

Response: Information available in Oregon's final 2004/2006 Section 303(d) list of Category 5: Water Quality Limited Waters Needing a TMDL, lists the Yamhill River watershed needing establishment of a TMDL (Total Daily Maximum Load) for parameters Chlorophyll a, chlorpyrifos , dissolved oxygen, bacteria, iron, manganese and temperature (Attachment 2). The following information identifies the primary sources of pollution for these listed parameters:

Agricultural operations are the primary source of pollution from Sheridan to the mouth of the South Yamhill River east of McMinnville. Monitoring of the South Yamhill River indicates that water quality is frequently impacted from high levels of phosphates and fecal coliform, indicating the presence of fertilizers and/or untreated animal or human wastes. High concentrations of nitrate and ammonia detected in the South Yamhill River supports this conclusion (Oregon Water Quality Index Report for Middle Willamette Basin, **http://www.deq.state.or.us/lab/wqm/wqindex/midwill3.htm**).

As indicated in the Natural Resource Conservation Plan (1979) of the Yamhill County Soil and Water Conservation District, failing septic systems are a major source of pollution (bacteria) in the Yamhill County area. (Upper South Yamhill River Watershed Assessment, **https://nrimp.dfw.state.or.us/web%20stores/data%20libraries/files/Watershed%20Councils/Watershed%20Councils_229_DOC_USYamhillAssmnt.pdf**).

RLI is keenly aware of the regional water quality issues associated with the South Yamhill River and has engineered systems in place to prevent impacts to the river that may result from landfill construction and operations. RLI has dedicated engineered collection and conveyance systems to safely and efficiently remove leachate generated in landfill cells and to effectively prevent any impacts to the environment. These systems meet or exceed US EPA requirements contained in Subtitle D (Municipal Solid Waste Landfill Regulations) and their designs have been approved by the DEQ. Riverbend Landfill is constructed utilizing a double-liner system to ensure containment. RLI performs routine monitoring for the presence of leachate in both our secondary liner containment system and the underlying groundwater. This monitoring is performed as part of RLI's formal Environmental Monitoring Plan (EMP) approved by DEQ, and sampling results are reported to DEQ routinely. Since routine environmental monitoring began at the facility in 1994, there has been no indication of a leachate release from our engineered containment systems and there are no data suggesting that landfill leachate is impacting the South Yamhill River.

3. "Should the County approve the expansion while the river is currently violating water quality standards associated with landfills?"; "Commentors advise that it would not be prudent for the county to make such an approval before a plan was in place to address the existing pollution."

Response: There is no evidence from any data collected at Riverbend Landfill indicating that water quality issues in South Yamhill River (as noted in the previous response) are attributed to facility operations.

RLI has had exceedences of the benchmarks contained in our 1200-Z Stormwater Discharge Permit. However, these benchmark exceedances are not water quality standard violations. Our permit clearly states: "Benchmarks are guideline concentrations not limitations. They are designed to assist the permittee in determining if the implementation of their stormwater pollution control plan (SWPCP) is reducing pollutant to concentrations below levels of concern." As a part of our daily operational activities, RLI maintains and inspects several environmental management systems to ensure their proper operation and to prevent system failures. There are currently no conditions indicating there is a pollution problem at the site.

4. "Leachate systems require maintenance of pipes, and pipes can fail because they crack, collapse, or fill with sediment. The EPA has concluded that all landfills will eventually leak into the environment (US EPA, 1988). Thus the fate and transport of leachate in the environment, from both old and modern landfills, is a potentially serious environmental problem and must be considered before the landfill expands to cover more riverfront property."

Response: The assertion that all landfills eventually leak and that future impacts to the South Yamhill River or groundwater are likely is misleading. Resource Conservation Recovery Act Subtitle D regulations have been in place for more than 15 years; they were promulgated several years after EPA's 1988 conclusion, in large part because of such conclusions. Since that time Subtitle D regulations have required an extremely high level of environmental protection. According to a 2007 report by Geosyntec, the high density polyethylene (HDPE) geomembrane components of a composite liner system may have service lives on the order of 1000 years; the service lives of the low permeability soil components of a composite liner system are on the order of several thousand years. In fact, the soil components of composite liners are relied upon by critical waste containment facilities that require a service life of very long periods, e.g., 10,000 years. Liner systems constructed at Riverbend Landfill far exceed those specified by current Subtitle D regulations. These systems are designed to provide protection to the environment, not for hundreds, but thousands of years by utilizing high strength synthetics and natural soil layers that work together to provide this protection.

As stated previously, RLI performs routine monitoring for the presence of leachate in both our secondary liner containment system and the underlying groundwater. This monitoring is performed as part of RLI's formal EMP, approved by DEQ in February 2008, and sampling results are reported to DEQ routinely. Since routine environmental monitoring began at the facility in the early 1990s, there has been no indication of a leachate release from our engineered containment systems, and there are no data to suggest that Riverbend Landfill is impacting the South Yamhill River.

5. "Riverbend has repeatedly violated the terms of its 1200-Z permit and has been discharging stormwater without a permit each day of measurable precipitation since its permit expired on June 30, 2007."

Response: DEQ has the following information on its NPDES Stormwater Discharge Permit website under Permit Documents:

> Note: The new requirements for the 1200-A and 1200-Z permits became effective on July 1, 2007. Facilities that are renewing their coverage under these permits should continue to operate under the terms of the permits that expired on June 30, 2007, until they receive written notification that their renewal application has been granted or denied. The new permit conditions will become effective once facilities have received this notification. (http://www.deq.state.or.us/wq/stormwater/industrial.htm)

As a permittee, RLI submitted the required Permit Renewal Application in December 2006 to DEQ. RLI has not received any correspondence indicating that the application has been granted or denied. RLI is complying with all requirements contained in our current permit, and thus, we are in compliance.

6. "Riverbend has repeatedly violated the following effluent limitations and other conditions contained in its 1200-Z NPDES permit on at least the following occasions:"

Response: Our 1200-Z NPDES Stormwater permit does not contain effluent limits. The permit contains benchmarks. As stated above in our response to Comment (3), our permit clearly states that benchmarks are guideline concentrations, not limits or standards. In all cases, when a benchmark exceedence has occurred, RLI initiated an investigation and implemented the necessary corrective actions. These actions are documented and routinely described in the annually stormwater report sent each year to the DEQ.

7. "There is no record in DEQ's files that Riverbend Landfill conducted either a monthly visual inspection or took designated outfall samples (four times a year)."

Response: We have conducted all required monthly visual inspections and outfall sampling as required in our current permit. This information is submitted annually to DEQ. RLI's current permit only requires sampling of the outfalls twice per year. The new 1200-Z permit, which DEQ has not yet issued to RLI, requires sample collection four times per year.

8. "Schedule A, Condition 9 of the 1200-Z NPDES permit requires the permittee to submit an Action Plan in response to benchmark exceedence; Section d of Condition 9 mandates that "the Action Plan must propose a sampling plan and methodology for demonstrating that the elevated pollutant levels are due to background or natural conditions". From its file review, NEDC finds no evidence that a sampling plan or methodology was proposed or conducted in satisfaction of the 1200-Z permit."

Response: Criteria referenced above are contained in the new 1200-Z permit that has not yet been issued to RLI by the DEQ. However, RLI takes these exceedences seriously, undertaking actions as applicable to solve the problem.

9. "RBLF itself has reported it has violated benchmark requirements on at least 40 times. Failure to conduct an investigation concerning the cause of RBLF's frequent benchmark exceedences has resulted in at least 40 permit violations."

Response: As previously noted, benchmark exceedences are not permit violations. Benchmarks are guideline concentrations not limitations. RLI has followed permit requirements for each exceedence. On each occasion, RLI investigated the occurrence, and took the necessary corrective.

10. "Schedule C of the 1200-Z permit requires that RBLF fully implement the measures in its SWPCP within 90 days after completion and subsequent revision of the SWPCP. RBLF's consistent benchmark exceedences indicate substantive flaws in the BMPs set forth in the SWPCP. Because of RBLF's failure to investigate the sources of these benchmark exceedences and submit revised SWPCPs, it is unclear which specific BMPs are inadequate."

Response: RLI's current SWPCP was revised accordingly for compliance upon issuance of our current permit. RLI investigations and corrective actions have prompted enhancement of identified BMPs.

11. "Riverbend Landfill's consistent benchmark exceedences indicate substantive flaws in the Best Management Practices set forth in the SWPCP. Because of Riverbend Landfill's failure to investigate the sources of these benchmark exceedences and submit revised SWPCPs, it's unclear which specific BMPs are inadequate; Despite Commentors file search, there is no evidence that Riverbend Landfill has implemented the BMPs laid out in its SWPCP. Riverbend Landfill's failure to to implement BMPs are ongoing violations subject to penalties for every day that Riverbend Landfill has failed to act in compliance with its permit; The systematic benchmark exceedences in Riverbend landfill's file indicate that the SWPCP is clearly insufficient as a means to eliminate pollution."

Response: As RLI has indicated in the above responses, we are complying with our current permit. Stormwater BMPs are implemented on an ongoing basis as part of our daily operations. All site BMPs (including stormwater BMPs) are routinely inspected and maintained to ensure effective environmental protection. RLI feels adequate stormwater BMPs are currently in place. If an identified BMP is determined not be adequate, it is revised and/or RLI identifies additional alternate technically and economically feasible control measures.

12. " Riverbend Landfill has consistently exceeded its benchmarks in every winter sampling event. These highly polluted discharges violate state water quality standards, the terms of Riverbend Landfill's SWPCP and the benchmark limits."

Response: RBL has followed permit requirements for each exceedence occurrence. On each occasion, an investigation was performed, and necessary corrective actions were taken in response to the exceedance. RLI has experienced periodic exceedences of our permit's *E. coli* benchmark. Upon occurrence, these exceedences have been investigated (and reported accordingly) to determine the source. We determined the cause to be wildlife species that frequent the site, particularly birds during certain times of the year. In response to this determination, RLI has instituted several measures, including hazing and active depredation, to reduce pollutant sources. RLI is working with the U.S. Department of Agriculture to improve bird control.

13. "Before approving the expansion of it facilities, Yamhill County should require RBLF demonstrate that is in full compliance with all environmental regulations."

Response: RLI is in compliance with all state and federal regulations. DEQ routinely inspects RLI for regulatory compliance. RLI is not aware of any noted deficiencies from these inspections.

In closing, I wish to reiterate to the Commissioners that RLI takes its environmental protection responsibility very seriously. We have, and will continue to take proactive approaches for environmental protection with facility operations.

Our expansion project will include the construction of additional stormwater management systems to effectively minimize the risk of stormwater impacts to local surface waters, These systems will consist of a multi-faceted approach, including but not limited to BMPs associates with soil handling and storage, road maintenance, and *in situ* treatment in conveyance swales and ditches, as well two-stage detention basins systems, and other structures to provide pretreatment settling and filtering before discharge.

The expansion will, of course, be built to the same high standards of the current landfill phases with regard to leachate containment, collection, and disposal, including rigorous environmental monitoring to ensure compliance.

Please let me know if you have any questions. I'd be happy to meet with you to discuss any concerns or other questions regarding our site operations and environmental protection systems.

Sincerely,

RIVERBEND LANDFILL COMPANY, INC.

George Duvendack
District Manager

WASTE MANAGEMENT

TECH FILE COPY
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File # I.2

RIVERBEND LANDFILL CO., INC.
13469 SW Hwy. 18
McMinnville, OR 97128
(503) 472-8788
(503) 434-9770 Fax

June 20, 2008

Tim Spencer
Oregon DEQ
2020 SW Fourth Ave. Ste. 400
Portland, OR 97201

COPY

Re: Surface water analytical results
Riverbend Landfill, SWDP 345
Yamhill County, Oregon

Dear Mr. Spencer:

As requested during your recent site inspection, surface water samples were collected at Riverbend Landfill on May 5th, 2008. Four samples were collected from on-site un-named tributaries of the South Yamhill River. The samples were collected up and down stream of regulated storm water sampling points. The samples were tested for typical parameters of those found in landfill leachate. Review of the analytical results indicates no leaching of landfill wastewater into the agricultural ditches and essentially the Yamhill River. The results are consistent downstream and upstream of the storm water discharge point.

Please review the attached summary table and sample locations and should you have any questions please contact me at (503) 472-8788 or Jeff O'Leary at (503) 640-9427.

Sincerely,
Riverbend Landfill

George Duvendack
District Manager

COPY

Enclosures: Analytical Results Summary Table and Site Map with Sample Locations

Cc: Jeff O Leary, Mark Reeves (WM)
RLC Tech Files

C:\Documents and Settings\gduvenda\My Documents\DEQ\Surface Water Sampling 06-19-08.doc

Collected	Method	Component	Result-01	Result-02	Result-03	Result-04	Units	RL
5/6/2008	120.1	Specific Conductance	280	320	260	250	umhos/cm	2
5/6/2008	130.2	Hardness, as CaCO3	120	120	100	95	mg/L	5
5/6/2008	160.1	Total Dissolved Solids	170	190	160	150	mg/L	10
5/6/2008	160.2	Total Suspended Solids	6	4	8.4	4	mg/L	4
5/6/2008	300.0A	Chloride	12	21	23	23	mg/L	0.5
5/6/2008	300.0A	Sulfate	47	43	16	15	mg/L	1
5/6/2008	300.0A	Nitrate	1.7	2	0.93	1	mg/L	0.05
5/6/2008	310.1	Bicarbonate, as CaCO3	65	73	75	70	mg/L	5
5/6/2008	310.1	Carbonate, as CaCO3	ND	ND	ND	ND	mg/L	5
5/6/2008	310.1	Total Alkalinity	65	73	75	70	mg/L	5
5/6/2008	350.1	Ammonia as N	0.097	0.07	0.099	0.094	mg/L	0.04
5/6/2008	410.4	Chemical Oxygen Demand (COD)	ND	ND	5.8	9	mg/L	5
5/6/2008	6010B	Calcium	29000	33000	28000	28000	ug/L	500
5/6/2008	6010B	Iron	ND	ND	35	34	ug/L	30
5/6/2008	6010B	Magnesium	8700	10000	8200	7400	ug/L	200
5/6/2008	6010B	Manganese	63	120	91	120	ug/L	3
5/6/2008	6010B	Potassium	ND	520	880	760	ug/L	500
5/6/2008	6010B	Silver	ND	ND	ND	ND	ug/L	3
5/6/2008	6010B	Zinc	ND	ND	ND	ND	ug/L	26
5/6/2008	6010B	Silicon	5800	5700	8200	8300	ug/L	100
5/6/2008	6010B	Sodium	12000	14000	12000	12000	ug/L	1000
5/6/2008	6020	Antimony	ND	ND	ND	ND	ug/L	0.6
5/6/2008	6020	Arsenic	ND	ND	ND	ND	ug/L	1
5/6/2008	6020	Cadmium	ND	ND	ND	ND	ug/L	0.2
5/6/2008	6020	Cobalt	0.5	0.62	0.52	0.47	ug/L	0.2
5/6/2008	6020	Copper	1.4	1.1	1.5	1.1	ug/L	1
5/6/2008	6020	Lead	ND	ND	ND	ND	ug/L	0.5
5/6/2008	6020	Nickel	1.3	1.3	1.1	ND	ug/L	1
5/6/2008	6020	Selenium	ND	ND	ND	ND	ug/L	1
5/6/2008	6020	Thallium	ND	ND	ND	ND	ug/L	0.2
5/6/2008	6020	Vanadium	ND	ND	3.5	ND	ug/L	3
5/6/2008	6020	Barium	27	33	27	22	ug/L	1
5/6/2008	6020	Chromium	ND	ND	ND	ND	ug/L	2
5/6/2008	6020	Beryllium	ND	ND	ND	ND	ug/L	0.4
5/6/2008	8260B	1,1,1,2-Tetrachloroethane	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	1,1,1-Trichloroethane	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	1,1,2,2-Tetrachloroethane	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	1,1,2-Trichloroethane	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	1,1-Dichloroethane	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	1,1-Dichloroethene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	1,1-Dichloropropene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	1,2,3-Trichlorobenzene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	1,2,3-Trichloropropane	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	1,2,4-Trichlorobenzene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	1,2,4-Trimethylbenzene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	1,2-Dichlorobenzene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	1,2-Dichloroethane	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	1,2-Dichloropropane	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	1,3,5-Trimethylbenzene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	1,3-Dichlorobenzene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	1,3-Dichloropropane	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	1,4-Dichlorobenzene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	2,2-Dichloropropane	ND	ND	ND	ND	ug/L	5
5/6/2008	8260B	2-Butanone (MEK)	ND	ND	ND	ND	ug/L	6
5/6/2008	8260B	2-Chlorotoluene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	2-Hexanone	ND	ND	ND	ND	ug/L	5

Collected	Method	Component	Result-01	Result-02	Result-03	Result-04	Units	RL
5/6/2008	8260B	4-Chlorotoluene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	4-Isopropyltoluene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	4-Methyl-2-pentanone	ND	ND	ND	ND	ug/L	5
5/6/2008	8260B	Acetone	ND	ND	ND	ND	ug/L	10
5/6/2008	8260B	Benzene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	Bromobenzene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	Bromochloromethane	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	Bromodichloromethane	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	Bromoform	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	Bromomethane	ND	ND	ND	ND	ug/L	2
5/6/2008	8260B	Carbon disulfide	ND	ND	ND	ND	ug/L	2
5/6/2008	8260B	Carbon tetrachloride	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	Chlorobenzene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	Chloroethane	ND	ND	ND	ND	ug/L	2
5/6/2008	8260B	Chloroform	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	Chloromethane	ND	ND	ND	ND	ug/L	2
5/6/2008	8260B	cis-1,2-Dichloroethene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	cis-1,3-Dichloropropene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	Dibromochloromethane	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	Dibromomethane	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	Dichlorodifluoromethane	ND	ND	ND	ND	ug/L	2
5/6/2008	8260B	Ethylbenzene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	Hexachlorobutadiene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	Isopropylbenzene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	Methylene chloride	ND	ND	ND	ND	ug/L	5
5/6/2008	8260B	n-Butylbenzene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	n-Propylbenzene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	Naphthalene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	sec-Butylbenzene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	Styrene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	tert-Butylbenzene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	Tetrachloroethene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	Toluene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	trans-1,2-Dichloroethene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	trans-1,3-Dichloropropene	ND	ND	ND	ND	ug/L	3
5/6/2008	8260B	Trichloroethene	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	Trichlorofluoromethane	ND	ND	ND	ND	ug/L	2
5/6/2008	8260B	Vinyl chloride	ND	ND	ND	ND	ug/L	1
5/6/2008	8260B	Xylenes (total)	ND	ND	ND	ND	ug/L	2

EXPLANATION
SW-050608-1 SURFACE WATER SAMPLE LOCATION (APPROXIMATE)
SW-050608-1
SW-050608-2
SW-050608-3
SW-050608-4
0
400
800
SCALE (FEET)
Shaw® ENVIRONMENTAL, Inc.
WASTE MANAGEMENT
DATE 06/09/08
DWN JC
APP JD
REV
PROJECT NO. 130594
FIGURE
RIVERBEND LANDFILL
McMINNVILLE, OREGON
SURFACE WATER SAMPLING LOCATIONS AND SITE MAP, MAY 6, 2008
File: C:\temp\portc\water sample.dwg Layout: Layout1 User: steve.zimmerman Jun 19, 2008 - 2:37pm
1"
1/2"
0"
1"