

# New York State Department of Environmental Conservation

## Division of Solid and Hazardous Materials, Region 9

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June 5, 2002

[REDACTED]  
Director of Water Resources  
Town of Tonawanda  
779 Two Mile Creek Road  
Tonawanda, New York 14150

Dear [REDACTED]:

Town of Tonawanda Landfill, #15S29  
Landfill Closure Investigation Report  
Revised March, 2002

Department staff have reviewed the Closure Investigation Report (CIR), Revised March 2002 for the Town of Tonawanda landfill. Malcolm Pirnie, Inc. has incorporated the responses to our previous comment letter on the CIR dated May 10, 1999 along with items that were discussed during our meeting on March 18, 2002. Therefore, the Department hereby approves the revised CIR for the Town of Tonawanda landfill.

The Conceptual Closure Plan as contained in Section 6.2 of the report, outlines the proposed closure activities as currently envisioned by the Town and is based upon the conditions which presently exist at the facility. The proposed closure design includes the incorporation of two specific variances from the 6 NYCRR Part 360 regulations. These include;

1. Subsection 360-2.13(p), which requires the construction of a gas venting layer directly below the barrier layer of the final cover system. For the Town of Tonawanda landfill, an alternative gas venting system is proposed which incorporates gas vents at a minimum spacing of one per acre and which in specific areas of the landfill are to be interconnected by gas collection trenches. Additionally, perimeter leachate collection trenches will also be designed to collect subsurface landfill gas.
2. Subsection 360-2.13(r)(2)(iii), which requires that a barrier protection layer of soil of not less than 24 inches thickness be installed above the geomembrane barrier layer. The thickness of the proposed barrier protection layer has been reduced to 12 inches.

While the Department approves the conceptual closure plan, including the above mentioned variances, the Town of Tonawanda should recognize that this approval is conditioned upon the information contained in the revised CIR and the site conditions as they currently exist. As you are aware, there are many factors which could alter the requirements for the landfill closure once the final design stage is reached. Included in such factors are the final outcome of the US Army Corps of Engineers FUSRAP investigation/remediation, the placement of various types of wastes in the landfill to be used as alternate grading materials and the Town's own proposed future use of the site following the completion of the closure activities. Certainly, if the Town proposes to utilize the closed landfill for some type of recreational activity such as a golf course, park or sports

fields, this may dictate the need to modify the final landfill closure plans accordingly.

It should also be noted that the figures presented in the conceptual closure plan must be considered to be *preliminary at this time*. In particular, Figures 6-4 and 6-4B, which provide details of the proposed gas venting system should not be considered to be the final approved design configuration for these components. During the final design of the landfill closure the Department will review and approve these design components based upon conditions that exist at that time.

The Department appreciates the cooperation of the Town in the matter of developing a comprehensive closure plan for the Tonawanda landfill and we look forward to the completion of this project in accordance with the provisions of the signed order on consent.

Should you have any questions on this matter, please call me at 851-7220.

Sincerely,

[Redacted Signature]

[Redacted Name], P.E.  
Environmental Engineer II

- cc: [Redacted], Regional Solid Materials Engineer  
[Redacted], Engineering Geologist II  
[Redacted], Assistant Regional Attorney  
[Redacted], DSHM, Albany  
[Redacted], Bureau Of Pesticides & Radiation/Albany  
[Redacted], US Army Corps of Engineers  
[Redacted], Malcolm Pirnie, Inc.