

US EPA ARCHIVE DOCUMENT

HIGHWAY 36 LAND DEVELOPMENT COMPANY  
A Subsidiary of Rollins Environmental Services, Inc.  
FACILITY AUDIT PACKAGE

# Highway 36 Land Development Company Facility Audit Package

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## **Facility Description**

Rollins' Highway 36  
108555 E. Highway 36  
Deer Trail, CO 80105  
970-386-2293

EPA ID Number: COD-991-300-484

Federal ID Number: 76-0167186

Highway 36 is located 70 miles east of Denver on US Highway 36, near Deer Trail, CO. The surrounding area is populated with less than 250 people within a 10 mile radius. Highway 36 owns 5,760 acres with the surrounding ground used primarily for agricultural purpose. Our permitted area is 325 acres. The facility is currently permitted for landfill disposal of just over 2.5 million cubic yards of treated waste. As of March 31, 1996, approximately 230,000 cubic yards of permitted air space has been consumed. The facility sets on 4,000 feet of unweathered Pierre shale. There is no aquifer underlying the permitted area. The annual average rainfall is 14 inches and the evaporation rate is 58 inches per year.

### **Regulatory Agencies**

Colorado Department of Public Health and the Environment  
(CDPHE)

Mr. Gary Baughman

Hazardous Materials Waste Management Division

4300 Cherry Creek Drive South

Denver, CO 80222-1530

Phone: 303-692-3300

USEPA Region VIII

Ms. Linda Jacobson

Waste Management Division

999 18 th Street, Suite 500

Denver, CO 80202-2405

Phone 303-293-1798

## Property History

Prior to 1980

Agricultural Use

In 1980, Highway 36 Land Development Company purchased 5,760 acres in southeast Adams County to site a hazardous waste management facility.

August 1983, Adams County Commissioners granted Highway 36 a Certificate of Designation.

March 1987, Colorado Department of Health issued the RCRA portion of a part B permit.

Highway 36 was the first commercial hazardous waste landfill constructed and permitted since the Hazardous and Solid Waste Amendments (HSWA) of 1984. April 1987, USEPA issued the Facility Part B Permit.

July 1, 1991, Concord Resources Group, Inc. purchased Highway 36 stock.

July 21, 1991, Highway 36 received the first waste shipment.

July 1994, Rollins Environmental Services, Inc. purchased Highway 36 stock.

## Permits

Permit	Issue Date	Number	Regulatory Agency
Certificate of Designation	1983	147-82-C-CD	Adams County Board of Commissioners
Colorado Wastewater Discharge Permit	1984	CO-0042064	CDPHE
RCRA Part B	1987	COD991300484	CDPHE
HSWA Part B	1987	COD991300484	USEPA
Air Emissions	1989	88AD100-1 thru 88AD100-4	CDPHE Pollution Control Division
Stormwater Discharge Permit	1992	COR-020149	CDPHE Water Quality Division
Permit to move soil	1993	S-4279	US Dept of Agriculture

## Compliance History

### RCRA

Inspections are conducted approximately 4 times a month by CDPHE.

February 4, 1994, a Notice of Violation (NOV) was issued based on routine inspections conducted by CDPHE dating back to November of 1992. The majority of items cited were previously addressed at the time the Notice of Inspections were issued by CDPHE. Cited items were addressed by Highway 36 to CDPHE satisfaction and were characterized as minor. Fines totaled \$29,350.00.

Air Emission inspections are conducted by the Tri-County Health Department. During the operating life of the facility there have been no violation and no enforcement actions.

Inspections of Highway 36 under the Colorado Discharge Permit Systems have not been conducted to date. January 2, 1992, Highway 36 self reported various minor violations resulting in a fine of \$27,000.00.

### OSHA

In the past five years there have been two OSHA notice of violations/enforcement letters. An OSHA Citation was issued on September 24, 1992, and an informal settlement agreed to on October 19, 1992. A de minimis OSHA record-keeping citation was issued on July 21, 1994, and the violation was corrected prior to receipt of citation.

### DOT

July 28, 1992, DOT noted violations. There was no enforcement action or fines.

## **Highway 36 Organizational Structure**

Attachment  
Highway 36 Organizational Chart

Rollins Highway 36 Management Team

**James P. Mock**  
**Vice President and General Manager**

1991 to Present: Direct the operations of the facility to insure compliance with all Corporate regulatory, environmental, and business practices policies, and all Federal, State and local business and environmental laws and regulations.

**Wendell O. Blakney**  
**Production Manager**

1991 to Present: Manage personnel and tasks associated with waste handling, treatment and disposal.

**Robert Kirby**  
**Maintenance Manager**

1990 to Present: Identify, perform, and direct the duties associated with light and heavy equipment maintenance and repair, administer the activities associated with the shop including fuel, oil, parts, and equipment purchasing under the supervision of the General Manager.



**Kenneth Miner**  
**Business Manager**

1995 to Present: Provide direct management of business and information activities per established policies and procedures to achieve company's financial and operational goals. Responsibilities include contract administration, receipt scheduling, business planning and analysis, and customer service. Responsible for QA/QC management directly or through specific designee for assigned functional activities.

**Richard Grondin**  
**Technical Manager**

1994 to Present: Oversee and manage technical aspects of Highway 36 operations; including verification of treatment standards and analytical documentation of waste pre-acceptance, treatment and disposal. Responsible for treatment procedures, personnel, equipment and overall management of Waste Water Treatment facility and Environmental monitoring. Responsible for general laboratory functions and supervision of Laboratory Manager and personnel.

**Steven Schneider**  
**Laboratory Manager**

1994 to Present: To manage daily laboratory functions, including supervision and daily planning of laboratory personnel.

**Peter J. Ferenc**  
**Controller**

1984 to Present: Responsible for development and preparation of all financial information necessary for making policy decisions and reporting results. Manages all accounting personnel. Responsible for budgeting, cost accounting, general ledger, accounts receivable, accounts payable, payroll, insurance and taxes.

**William E. Mills**  
**Manager Environmental Affairs and Regulatory Compliance**

1994 to Present: Oversee Environmental Affairs and Regulatory Compliance

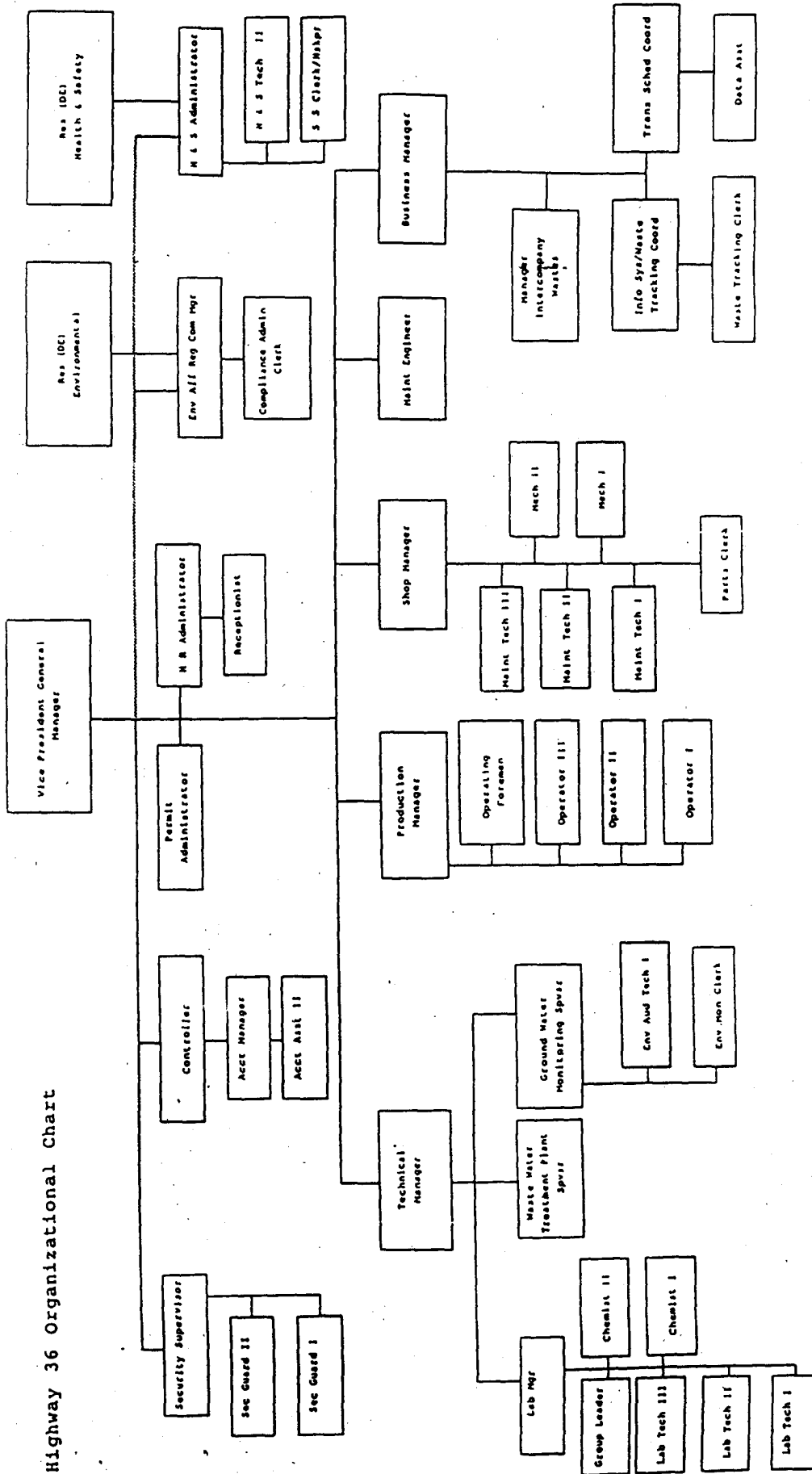
**Dolly Mae Sharpe**  
**Accounting Manager/Human Resources Administrator**

1990 to Present: Manage accounting and purchasing functions. Administer all personnel functions, assist in personnel training and medical surveillance.

**Doug Pelton**  
**Health and Safety Administrator**

1994 to Present Monitors and maintains Health and Safety records and conduct for site personnel. Development of training programs for site and job specific functions. Administers Industrial Hygiene program. Monitors the medical surveillance program.

# Highway 36 Organizational Chart



## Health and Safety

1. Compliance with Occupational Safety and Health Administration (OSHA) and other health and safety standards to protect all employees, contractors, and visitors are a fundamental and indispensable adjunct to all Highway 36 operations and a condition of employment for all employees.
  - a. Hazardous waste exposures during normal operations at Hwy 36 primarily consist of inorganic materials as particulates through the respiratory tract pathway. All treatment of hazardous waste is accomplished while in level C or higher protection inside a containment building and the air is cleaned of particulates and gases/vapors prior to being released to the atmosphere. Exterior doors on the containment building remain closed during off-loading, treating, and mixing of waste. Exposures continue to be minimized by transporting all wastes to secure cells in covered containers and only when wind speeds are less than 35 mph. All roads on which wastes are transported at Hwy 36 are hard-surfaced and routinely cleaned, and hard-surfaces in all storage and transport areas simplify containment and removal of any spilled material and decontamination of the surfaces.
  - b. The following table is our health and safety record for the past five calendar years:

CALENDAR YEAR	TOTAL # OF INJURIES	TOTAL # OF LOST WORKDAY CASES	TOTAL # OF RESTRICTED WORKDAY CASES	TOTAL # OF CASES WITH MEDICAL ATTENTION ONLY	TOTAL # OF FATALITIES	TOTAL MANHOURS WORKED
1991	2	1	1	1	0	145,619
1992	9	6	4	3	0	142,687
1993	9	6	6	2	0	140,236
1994	4	2	1	2	0	135,237
1995	4	1	1	3	0	129,853

2. The personnel training program, managed by the Health and Safety Administrator (HSA), consists of formal training, On-the-Job (OJT) and annual refresher training (Attachments A and B). The program is designed to train Highway 36 employees to perform their duties proficiently and safely and ensure emergencies are effectively resolved. Every 6 months, the HSA compares each employee's personnel file against their job description and training requirements to verify the frequency and type of training required for that job. The training plan is reviewed annually by the HSA and other managers to ensure changes in processes or waste streams, permit requirements, and incidents are being properly dealt with.
  - a. Formal training consists of initial 40-hour HAZWOPER training followed by in-house presentations of training modules that are selected based on specific job titles. Mastery of initial classroom training is substantiated by either completion of a unit quiz for each training module or certificates of course completion. Initial training is completed within 6 months after the date of employment. Annual refresher training that reviews and updates modules previously presented to an employee is provided within twelve months from the date of initial training or last annual refresher training.
  - b. Emergency response team members, the emergency coordinator, and alternate emergency coordinators receive additional training and education as required by 29 CFR 1910.120 Subpart L.

- c. OJT is conducted to familiarize new employees and employees transferring into new positions with their duties including hazards associated with the job; personal protective equipment required; general training in emergency procedures; and environmental protection. OJT is based on job descriptions and managed through an OJT work-sheet. Proficiency of the trainee is authenticated by the OJT trainer (i.e. area supervisor or foreman) via an operating test (performance/written), a verbal test, or other performance evaluation demonstration. Initial OJT training is completed in the first six weeks of employment or reassignment by a line-supervisor or experienced co-worker in the same job classification. Both the employee and the individual supervising the training sign and date the OJT form.
- d. Personnel Training Records are maintained continuously on current employees and for three years after leaving on departed employees.
- e. Standard Operating Procedures (SOPs) have been developed for specific functions in all operational areas. Review and revision of current SOPs and development of new SOPs are an ongoing process.

HIGHWAY 36 LAND DEVELOPMENT COMPANY (RES [CO]) HEALTH AND SAFETY PLAN

APPENDIX C  
TRAINING AFFIDAVIT

I, \_\_\_\_\_, am an employee of Highway 36 Land Development Company and have received instruction on the following topics:

MODULE	DESCRIPTION	DATE	TRAINEE'S INITIALS	TRAINER'S INITIALS
F3	Site Safety			
F4	Individual Contingency Plan			
F5	Regulatory Requirements			
F6	Hazard Communication			
F7	Introduction to PPE			
F8	Intro to Respiratory Protection			
F9	Advanced Respiratory Protection			
F10	Intro to Fire and Fire Extinguishers			
F11	Advanced Fire			
F12	First Aid			
F13	CPR			
F14	Heat/Cold Stress			
F15	Hearing Conservation			
F16	Heavy Equipment			
F17	Skid Steer Drum Lift			
F18	Basic Chemical Concepts			
F19	Basic Toxicology			
F20	Lab QA/QC			
F21	Confined Space Entry			
F22	Lock Out/Tag Out			
F23	Asbestos Training			
F24	Hot Work Procedures			
F25	Electrical Grounding			
F26	Safe Drum Handling			
F27	Placards, Labels, & Manifests			
F28	Train the Trainer			
F30	Emergency Response Level I, II, III			
F32	Annual Review			
F33	Advanced Use of Fire Protection & Spill Response Equipment			
F34	OSHA-8 Hour Update			

I have had the opportunity to ask questions and receive answers on the contents of this training. I understand the training I have received and agree to abide by the standards presented therein.

\_\_\_\_\_  
Signature \_\_\_\_\_ Date

I Modules constitute formal training (excluding initial OSHA HAZWOPER) required by Part I.H. of our Permit. The listing of formal training requirements by job position is in Appendix A and descriptions of information to be addressed is in Appendix B.







APPENDIX D

On the Job (OJT), Training Requirements

PTP Appendix D

Job Title	J1-SAMPLING	J2-ANALYTICAL METHODS	J3-CALIBRATION/LAB	J4-WASTE MGT DOC	J5-QAM MONITORING EQPT	J6-WASTE INSPECTION	J7-ONSITE INSPECTION	J8-SEGREGATION	J9-FIRE EXTINGUISHERS	J10-HEAVY EQPT	J11-POWER EQPT	J12-HAND TOOLS	J13-CONTAINER HANDLING	J14-GROUNDING	J15-MANUAL LIFTING	J16-EQPT LIFTING	J17-WASTE LOAD/UNLOAD	J18-TRUCK WASH	J19-EMERGENCY EQPT USE	J20-FIRE FIGHTING	J21-PPE	J22-SCBAS	J23-OAM & OTHER FE SYS	J24-HAND SIGNALS	J25-COMMUNICATIONS EQPT	J26-CONTINGENCY PLAN	J27-OAM PRIMARY W M AREAS	J28-WASTE MOVE DOC	J29-EMERGENCY COMM SYST/MAINT	J30-EMERGENCY SYS/OP UNITS	J31-GENERAL SAFETY MEETINGS			
ON THE JOB (OJT) TRAINING MATRIX																																		
VP and GM																																		
SECURITY SUPERVISOR																																		
SECURITY GUARD II, I, PT																																		
CONTROLLER																																		
ACCOUNTING MANAGER																																		
ACCOUNTING ASSISTANT II, I																																		
PERMIT ADMINISTRATOR																																		
HUMAN RESOURCES ADM																																		
RECEPTIONIST																																		
MEARC																																		
COMPLIANCE ADMIN CLK																																		
HEALTH & SAFETY ADM																																		
HEALTH & SAFETY TECH II, I																																		
SAFETY SUPPLY CLERK																																		
TECHNICAL MANAGER																																		
LABORATORY MANAGER																																		
CHEMIST III, II, I																																		
LAB GROUP LEADER																																		
LAB TECHNICIAN III, II, I																																		
IWW TRMT PLANT SPVSR																																		
GRND WTR MONITORING SPVSR																																		
ENV AUDITING TECH II, I																																		
ENV MONITORING CLERK																																		
PRODUCTION MANAGER																																		
OPERATING FOREMEN																																		
OPERATOR III, II, I																																		
MAINTENANCE MANAGER																																		
MAINT TECHNICIAN III, II, I																																		
MECHANIC II, I																																		
PARTS CLERK																																		
MAINTENANCE ENGINEER																																		
BUSINESS MANAGER																																		
MGR INTERCOMPANY WASTES																																		
INFO SYS/WSTE TRKG COORD																																		
WASTE TRACKING CLERK																																		
TRANS SCHEDULING COORD																																		
DATA ASSISTANT																																		
ECs, ERs, ALTs																																		

Q=Quarter M=Month W=Week I=Initial A=Annual PT= Part-time

## Waste Acceptance

Highway 36 waste approval procedures are in place to provide an efficient method to accurately characterize waste and the recommended treatment methods. In this process we review environmental issues as well as safety issues to protect our staff and local community.

The pre-acceptance procedures are outlined in the Permit Waste Analysis Plan.

The process begins with a representative sample of the waste. Each sample submitted is required to be accompanied by a Highway 36 Waste Characterization Data Sheet (WCD). Each sample must be labeled with the corresponding WCD number. Debris waste streams require a detailed description, and photographs are helpful. The WCD provides valuable information to our Laboratory and Technical Staff and assures proper handling at our facility. With proper information Highway 36 can approve your waste shipment in a timely fashion.

Highway 36 accepts hazardous and non hazardous waste streams. An acceptable waste code list is attached. Dioxin bearing wastes, codes F020 to F023 and/or F026 or F032, require prior approval from CDPHE. The request for approval must include analytical information that indicates that the described codes meet applicable Land Disposal Restrictions (LDR).

Highway 36 can not accept RCRA regulated organic compounds above LDR, or water reactive wastes for treatment. Additionally, Highway 36 may not receive radioactive wastes above facility background, explosive, shock/heat sensitive or bio-hazardous wastes.

### Appendix 3

## WASTE ANALYSIS PLAN APPROVED WASTE CODES

D Codes	F Codes	K Codes	P Codes
D001 thru D043	F001 thru F012 F019 thru F028 F032 F034, F035 F037 thru F039	K001 thru K052 K060 thru K062 K064 thru K066 K069, K071 K073 K083 thru K088 K090, K091 K093 thru K118 K123 thru K126 K131, K132 K136 K141 thru K145 K147 thru K151 K156 thru K161	P001 thru P018 P020 thru P031 P033 thru P051 P054 P056 thru P060 P062 thru P078 P081, P082 P084, P085 P087 thru P089 P092 thru P099 P101 thru P116 P118 thru P123 P127, P128 P185 P188 thru P192 P194 P196 thru P199 P201 thru P205

U Codes
U001 thru U012 U014 thru U223 U225 thru U249 U271 U277 thru U280 U328, U353, U359 U364 thru U367 U372, U373 U375 thru U379 U381 thru U387 U389 thru U396 U400 thru U404 U407 U409, U410, U411

## Laboratory

Highway 36 houses a modern laboratory equipped to accurately identify and quantify hazardous constituents in all types of sample matrices. EPA-approved methodologies employed at Highway 36 include, but are not limited to, such analyses as onsite fingerprints, metals, cyanide, pesticides, herbicides, volatile and semi-volatile organic compounds.

The laboratory is comprised of state of the art analytical instruments and highly-trained technicians and chemists. Serving as the technical nucleus of the facility, the laboratory provides mix designs and analytical data as precursors to proper waste treatment and disposal.

A key to success at Highway 36 has been through compliance with a strict, corporate wide Laboratory Quality Assurance Program (LQAP) which encompasses our technical staff and up-to-date analyses. Highway 36 management provides a scientific baseline objective that all data generated by the laboratory must be scientifically defensible and of known and documented quality. The program defines such requirements as accuracy and precision acceptance criteria, staff training and periodic performance evaluation studies. Scheduled reviews of the site Waste Analysis Plan, laboratory Quality Assurance Manual and SOPs keep these documents current with the latest technologies and quality control measures.

## Operations

The process building is divided into three areas:

1. Receiving
2. Treatment
3. Container Management

Bulk wastes are received through four enclosed, independent receiving bays. Each bay corresponds with a 130 cubic yard receiving and mixing basin accommodating end-dumps or roll-off boxes. The solidification building is divided into two separate areas allowing for the segregation of materials requiring different PPE. If a bulk load is brought in with a direct bury waste streams the material will be placed directly in the Secure Cell.

Types of operations include sizing, encapsulation, blending, shredding, solidification, and direct placement. Acceptable Technology Codes are CHOXD, CHRED, DEACT, NEUTR, STABL and EPA's alternative treatment methods (40 CFR 268). For each campaign of treated material a sample is taken and a TCLP test is performed to ensure treatment to LDR.

Drummed and small container wastes are off loaded in the receiving area in the container storage area. The containers are then sampled and fingerprinted to ensure that the waste matches pre-acceptance data. Container storage area provides proper segregation and is permitted for 600 container units. The container storage area is separated from the treatment building by a common wall, where the shredder is located. When shredding drums the material passes through to a mixing basin in the Solidification Building for treatment.

Operating and Environmental Monitoring inspections are required by permit; daily, non operating day, weekly, monthly, quarterly, yearly, biannual, and every five years of various areas within the permitted area.





## **Computerized Waste Tracking**

Highway 36 uses a computerized relational database to aid in the regulatory requirement of cradle-to-grave tracking. The backbone of the system is Wixel's TSDTrax, accompanied by custom programming by Wixel, internal custom programming, and a myriad of reports. The outline below provides a brief overview of the information contained in this system and applications of the system.

### **Pre-shipment**

- Generator records (name, address, contact, phone, fax, bill to, EPA ID)
- Transporter records
- Sample data tracking
- Analytical analysis data
- Waste Profile data
- Pre-Treatment and Disposal Recommendation sheet

### **Scheduling**

- Shipment orders, which are requested by the customer, are entered into the pickup database
- Upon approval, orders are automatically posted to the receiving schedule
- Dispatch orders are printed from databases

### **On-Site Management**

- At the gate
  - manifest information is entered into the computer
  - manifests are equated with workorder number
  - containers numbers are created and linked to the profile, workorder, and generator manifest

- **Fingerprinting and Off-Specification Identification**
  - Fingerprint perimeters are based on pre-acceptance
  - Off-Specs, if any, are based on fingerprint results and/or paperwork
  - An Off-Spec Discrepancy summary, with approval signature, is generated
- **Movement Requests (MR)**
  - Internal document which authorize waste transfer and treatment provide a link to inventory
  - Final MR is to the landfill disposal cell
- **Drum Management**
  - Drum labels are generated with EPA regulated drum grouping compatibility
  - Drum Inventory audit report is generated

### **Post-disposal**

- Workorder Summary is printed for Accounting. Includes information entered by the Scheduling Data Clerk at time of order, actual quantities received, off-spec information, pricing information
- Certificate of Disposal is forwarded to Accounting, sent to customer with invoice

### **Auxiliary Management Tools**

- Contact List, summarizing generators, waste profiles and status
- Shipment Summary by Generator or by Profile
- Off-spec Summary by Territory by Generator
- Off-spec Summary by Generator
- Container Audit reporting
- Manifest Audit reporting

## Ground Water Monitoring

There are 120 monitoring wells located both within and outside the Hwy 36 compliance boundary. 32 of these wells are considered "wet" wells. Only 22 of the wet wells hold sufficient volume to collect a GW-2 sample suite which includes volatile organics, total organic carbon (TOC), total organic halides (TOX), phenols, dissolved metals, nitrates/nitrites, alkalinity, chloride, and fluoride.

All wet wells are initially sampled for four background sample suites of GW-1 constituents which include the above parameters with the addition of semi-volatile organics, PCB's, BNA's, Herbicides, Pesticides, and radiochemistry. These samples were obtained prior to receipt of waste at the facility. For future cell construction, monitoring wells must be installed and sampled utilizing the GW-1 parameters for four quarters prior to receipt of waste within that particular cell. GW-2 sample parameters shall be analyzed quarterly thereafter.

In the event a tentative statistical exceedance should occur through the GW-2 analysis, a GW-1 sample suite shall be obtained the following quarter. Should the constituent exceedance be confirmed through this sampling event, implementation of the Contingency Plan shall be warranted for Inspection monitoring wells (Level 3, 4, and 6), and implementation of the Compliance Monitoring Program for the Detection monitoring wells (Level 5). The tentative statistical exceedances incurred at Hwy 36 have been proven inconclusive through confirmatory results.

Level 3 monitoring wells : 36 wells located in the sand bodies of the surficial clay unit ranging in depths of 25 - 40 feet. L3 wells are dry.

Level 4 monitoring wells: 58 wells located in the zone between the weathered pierre shale and the unweathered pierre shale ranging in depths of 40 - 70 feet.

Level 5 monitoring wells: 8 wells located at the uppermost saturated portion of the unweathered pierre shale ranging in depths of 276 - 440 feet.

Level 6 monitoring wells: 3 wells located in the zone defined as the first occurrence of saturated conditions in the alluvial drainage outside the compliance boundary ranging in depths of 27 -- 57 feet.

Brine Pond monitoring wells: 15 wells located in a previously closed oil field brine pond. These wells were monitored through the first quarter of 1994.

The Roller Compacted Concrete (RCC) in the process area is sloped to drain the stormwater runoff into the potentially contaminated retention basin (PCRB) as are all potentially contaminated (PC) ditches. The PC water is treated in the wastewater treatment plant through flocculation/clarification, multi-media filtration, and carbon adsorption. The contaminated water (on and off site truck wash and operations accumulative sumps) are also treated through the wastewater treatment plant utilizing the above treatment method with the addition of the reverse osmosis system for the final phase.

Treated water is discharged through discharge point DP-001 into the Highway 36 plant water tanks for process area reuse. Should the tanks be filled to capacity, the water would then be discharged into UC-6 which flows to the uncontaminated detention pond (UCDP). Each discharge is analytically monitored in accordance with a Colorado Discharge Permit Systems (CDPS) permit which requires Highway 36 to remain within all effluent limitations.

## **Closure and Post Closure**

### **Attachments**

Permit Attachment CLP-1, Closure Cost Estimate  
Certificate of Insurance Closure and Post Closure

### **Summary of the Final Filling of Secure Cells**

The waste filling plan for the secure cells is divided into a series of stages.

**Stage 1 Intermediate Waste Grading Plan (Stage 1)**  
During placement of waste to achieve the intermediate waste grading, the operations layer will be placed over the liner on the slopes to the crest of the landfill.

**Stage 2 Final Waste Grading Plan**  
Filling of cells to the final waste elevations will be accomplished in two lifts. Lift number 1 will bring the waste above the crest of the cell with V-ditches and sump area operational. The lift will be approximately 4 to 7 feet thick. Lift number 2 will bring the waste to the final lines and grades. The lift will be approximately 4 feet thick. Waste will be back filled into the V-ditches and intermediate soil cover must be placed directly over the waste so the waste will not be exposed in V-ditch during filling.

**Stage 3-6 Sump Back filling**  
The Sump Filling Plan goes through five phases to complete the placement of waste and to control the surface water run off.

## Cover Construction

The liner System will consist of the following components from top to bottom:

Vegetative soil cover

General fill

Geocomposite drainage layer

80 mil HDPE geomembrane

3 feet of compacted clay liner

Interimsoil cover

HIGHWAY 36 LAND DEVELOPMENT COMPANY

CLOSURE COST ESTIMATE  
REFERENCES

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1. Adjusted for inflation to reflect 1994 dollars
2. Sussex Contractors, Inc.; Deer Park, Texas
3. Highway 36 Operational Experience
4. Southwest Portland Cement; Denver, Colorado
5. Resource Technologies Group; Lakewood, Colorado
6. Oil & Solvent Process Co.; Henderson, Colorado
7. ENCOTEC; Ann Arbor, Michigan
8. Nilex Corporation; Englewood, Colorado
9. Rohm & Haas; Philadelphia, Pennsylvania
10. Denver Commercial Builders (DCB); Denver, Colorado
11. Danis Construction; Dayton, Ohio
12. 1993 Secure Disposal Cell 2 Construction Bids
13. Morgan Sand and Gravel; Fort Morgan, Colorado
14. H36LDC, Deer Trail, Colorado/CenRef Laboratories; Brighton,  
Colorado
15. TerraMatrix Engineering and Environmental Services; Steamboat  
Springs, Colorado

**K. Total Final Closure Cost**

A.	Project Manager and Equipment Cost	\$331,764
B.	Waste Inventory Treatment and Disposal Cost	\$302,714
C.	Contaminated Solids Disposal Cost	\$421,089
D.	Contaminated and Potentially Contaminated Water Treatment and Disposal Cost	\$175,907
E.	Equipment and Structures Decontamination Cost	\$512,649
F.	Backfill of Voids Cost	\$348,857
G.	Final Cover Placement and Vegetation Cost	\$1,777,140
H.	Groundwater Monitoring Cost	\$61,132
I.	Leak Detection/Permanent Sump Monitoring Cost	\$32,549
J.	Closure Certification Cost	\$30,479
K.	Total Closure Cost	\$3,994,280



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HIGHWAY 36 LAND DEVELOPMENT COMPANY

ATTACHMENT 1

INCREMENTAL CLOSURE COST ESTIMATE IF AVAILABLE AIRSPACE IS LESS THAN  
47,000 CUBIC YARDS

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In the unlikely event that the Facility should go into closure without 47,000 cubic yards of available airspace, it may be necessary to construct an additional permitted landfill unit. This unit would be downsized to be a 47,000 cubic yard secure cell to dispose the on-site inventory and other materials requiring disposal at final closure. This 47,000 cubic yards of airspace would be within the 2,528,000 cubic yards of currently permitted airspace and would not represent a new landfill. The objective of this attachment is to estimate the addition to the closure cost should this scenario occur.

The cost to construct a 47,000 cubic yard secure cell and close the Facility is estimated to be the cost of closure described in the main text of the Closure Cost Estimate (\$3,468,030) plus the cost to construct and cap the 47,000 cubic yard secure cell. The figures below estimate the cost to do so using the same references as used in the main text of the Closure Cost Estimate.

The 47,000 cubic yard secure cell cost estimated below is based upon dimensions of 352 feet by 352 feet at the surface, 42 feet deep, and 3 (horizontal):1(vertical) sideslopes.

## SECURE CELL ESTIMATED CONSTRUCTION COST

No.	Item	Amount	Unit Rate	Cost
1.	Mobilization and Demobilization	n/a	n/a	\$ 50,000
2.	Site Preparation	n/a	n/a	\$ 40,000
3.	Cell Excavation	87,000 cy	\$3.00	\$ 261,000
4.	Clay Liner	34,000 cy	\$7.16	\$ 243,440
5.	80-mil HDPE Liner	260,000 sf	\$0.61	\$ 158,600
6.	Filter Geotextile	5,000 sf	\$0.18	\$ 900
7.	Geocomposite	265,000 sf	\$0.65	\$ 172,250
8.	Sump and Pipe Bedding Gravel	300 cy	\$35.00	\$ 10,500
9.	Leachate Collection Sand Layer	400 cy	\$30.00	\$ 12,000
10.	8" Diameter HDPE Pipe	400 lf	\$20.00	\$ 8,000
11.	18" Diameter HDPE Pipe	420 lf	\$100.00	\$ 42,000
12.	24" Diameter HDPE Pipe	220 lf	\$150.00	\$ 33,000
13.	Protective Soil Layer	7,000 cy	\$4.89	\$ 34,230
14.	Sump Pumps and Concrete	n/a	n/a	\$ 5,000
Total Estimated Contractor Cost				\$1,070,920
Estimated CQA Cost (assumes 25% of contractor cost)				\$ 267,730
Total Estimated Cell Construction Cost				\$1,338,650

## FINAL COVER ESTIMATED CONSTRUCTION COST

No.	Item	Amount	Unit Rate	Cost
1.	Mobilization and Demobilization	n/a	n/a	\$ 25,000
2.	Site Preparation	n/a	n/a	\$ 20,000
3.	Clay Liner	14,000 cy	\$7.16	\$ 100,240
4.	80-mil HDPE Liner	125,000 sf	\$0.61	\$ 76,250
5.	Geocomposite	125,000 sf	\$0.65	\$ 81,250
6.	General Fill	14,000 cy	\$4.89	\$ 68,460
7.	Vegetation	3 acres	\$1,200	\$ 3,600
8.	Trench Excavation	26 cy	\$5.00	\$ 130
9.	Gas Vent Gravel	26 cy	\$35.00	\$ 910
10.	Gas Vent Geotextile	3,530 sf	\$0.18	\$ 635
11.	Concrete Pads & Assoc. Structures	n/a	n/a	\$ 4,000
12.	4" Diameter HDPE Pipe	720 lf	\$10.23	\$ 7,366
Total Estimated Contractor Cost				\$ 387,841
Estimated CQA Cost (assumes 25% of contractor cost)				\$ 96,960
Total Estimated Final Cover Construction Cost				\$ 484,801

Total Estimated Cost to Construct and Cover a 47,000 cy Secure Cell \$1,823,451

**F. Total Post-Closure Costs**

1.	Groundwater Monitoring	\$1,384,140
2.	Leachate Collection System	\$ 627,562
3.	Leak Detection System	\$ 114,127
4.	Permanent Sump System	\$ 114,227
5.	Maintenance	<u>\$ 552,847</u>
6.	<b>TOTAL POST-CLOSURE ESTIMATE</b>	<b>\$2,792,903</b>

# ACORD. CERTIFICATE OF INSURANCE

ISSUE DATE (MM/DD/YY)

4/5/96

**PRODUCER**

Rollins Hudig Hall of PA., Inc.  
Public Ledger Building  
520 Chestnut Street, Suite 500  
Philadelphia, PA 19106

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

**COMPANIES AFFORDING COVERAGE**

**INSURED**

Highway 36 Land Development Company  
108555 East Highway 36  
Deer Trail, CO 80105  
  
EPA ID # COD 991300484

- COMPANY LETTER **A** Commerce & Industry Insurance Company
- COMPANY LETTER **B**
- COMPANY LETTER **C**
- COMPANY LETTER **D**
- COMPANY LETTER **E**

**COVERAGES**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
	<b>GENERAL LIABILITY</b>				
	COMMERCIAL GENERAL LIABILITY				GENERAL AGGREGATE \$
	CLAIMS MADE OCCUR.				PRODUCTS-COMP/OP AGG \$
	OWNER'S & CONTRACTOR'S PROT.				PERSONAL & ADV. INJURY \$
					EACH OCCURRENCE \$
					FIRE DAMAGE (Any one fire) \$
					MED. EXPENSE (Any one person) \$
	<b>AUTOMOBILE LIABILITY</b>				
	ANY AUTO				COMBINED SINGLE LIMIT \$
	ALL OWNED AUTOS				BODILY INJURY (Per person) \$
	SCHEDULED AUTOS				BODILY INJURY (Per accident) \$
	HIRED AUTOS				PROPERTY DAMAGE \$
	NON-OWNED AUTOS				
	GARAGE LIABILITY				
	<b>EXCESS LIABILITY</b>				
	UMBRELLA FORM				EACH OCCURRENCE \$
	OTHER THAN UMBRELLA FORM				AGGREGATE \$
	<b>WORKER'S COMPENSATION AND EMPLOYERS' LIABILITY</b>				STATUTORY LIMITS
					EACH ACCIDENT \$
					DISEASE—POLICY LIMIT \$
					DISEASE—EACH EMPLOYEE \$
	<b>OTHER</b>				
A	Closure	PLL 529 3059	4/1/96	4/1/97	\$6,000,000 Closure
	Post Closure	PLL 529 3059	4/1/96	4/1/97	\$3,000,000 Post Closure

**DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS** This Certificate certifies that the policy to which this Certificate applies, provides Closure and Post-Closure Care coverage in connection with the Insured's obligation to demonstrate financial responsibility under section 266.14 of the Colorado Hazardous Waste Regulations, C.R.S. 1973, as amended.

**CERTIFICATE HOLDER**

Colorado Department of Health  
Hazardous Material and Waste  
Management Division  
4210 East 11th Avenue  
Denver, CO 80220

**CANCELLATION**

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL MAIL 60 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT.

AUTHORIZED REPRESENTATIVE

*Jarrett A. Matheson*

## Financial Review

### Attachments:

Certificate of Insurance

Audited Financial Statement with Auditors Opinion

## FINANCIAL REVIEW

## FIVE YEAR SELECTED FINANCIAL DATA

(Dollars in Thousands, Except Per Share Amounts)

FISCAL YEAR ENDED SEPTEMBER 30,	1995	1994	1993	1992	1991
Revenues	\$ 217,367	\$ 181,468	\$ 214,843	\$ 240,477	\$ 220,759
Earnings (loss) before income taxes (benefits)	\$ (28,655)	\$ (16,876) <sup>(1)</sup>	\$ 19,155	\$ 49,215	\$ 40,020
Income taxes (benefits)	(10,363)	(6,942) <sup>(2)</sup>	7,231	17,203	14,083
Net earnings (loss)	\$ (18,292)	\$ (9,934) <sup>(1)(2)</sup>	\$ 11,924	\$ 32,012	\$ 25,937
Earnings (loss) per share	\$ (.30)	\$ (.16) <sup>(1)(2)</sup>	\$ .20	\$ .53	\$ .43
Cash dividends per share <sup>(3)</sup>	\$ —	\$ —	\$ .10	\$ .0925	\$ .09
<b>SEPTEMBER 30,</b>					
Working capital	\$ 50,772	\$ 66,369	\$ 64,864	\$ 68,898	\$ 60,891
Property and equipment	\$ 298,673	\$ 166,383	\$ 180,998	\$ 169,285	\$ 151,446
Total assets	\$ 429,484	\$ 273,386	\$ 278,641	\$ 283,318	\$ 257,968
Long-term debt	\$ 134,181	\$ 3,970	\$ 4,632	\$ 5,444	\$ 7,945
Shareholders' equity	\$ 184,669	\$ 202,961	\$ 212,807	\$ 206,572	\$ 179,809

<sup>(1)</sup> Includes special charge of \$14,500 (\$9,031 after tax benefit or \$.15 per share).<sup>(2)</sup> Includes benefit of \$543 or \$.01 per share from the adoption of SFAS No. 109 - Accounting for Income Taxes.<sup>(3)</sup> The Company's Board of Directors suspended the payment of cash dividends at its October 29, 1993 meeting. The Board of Directors periodically reviews this decision.

## INDEPENDENT AUDITORS' REPORT

The Shareholders and Board of Directors  
Rollins Environmental Services, Inc.

We have audited the accompanying consolidated balance sheets of Rollins Environmental Services, Inc. and subsidiaries as of September 30, 1995 and 1994 and the related consolidated statements of operations and cash flows for each of the years in the three-year period ended September 30, 1995. These consolidated financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these consolidated financial statements based on our audits.

We conducted our audits in accordance with generally accepted auditing standards. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audits provide a reasonable basis for our opinion.

In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the financial position of Rollins Environmental Services, Inc. and subsidiaries as of September 30, 1995 and 1994, and the results of their operations and their cash flows for each of the years in the three-year period ended September 30, 1995, in conformity with generally accepted accounting principles.

As discussed in the Notes to the Consolidated Financial Statements, in fiscal year 1994, the Company changed its method of accounting for income taxes.

Wilmington, Delaware  
October 26, 1995

KPMG Peat Marwick LLP

# ACORD. CERTIFICATE OF INSURANCE

DATE (MM/DD/YY)  
9/19/95

**PRODUCER**

Rollins Hudig Hall of PA, Inc.  
620 Public Ledger Building  
Philadelphia, PA 19106  
(215) 925-6100

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**COMPANIES AFFORDING COVERAGE**

COMPANY  
A

COMPANY  
B

Commerce & Industry Insurance Company

COMPANY  
C

COMPANY  
D

**INSURED**

Highway 36 Land Development Company  
108555 East Highway 36  
Deer Trail, CO 80105

EPA ID # 991300484

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	<b>GENERAL LIABILITY</b> <input type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS MADE <input type="checkbox"/> OCCUR <input type="checkbox"/> OWNER'S & CONT PROT				GENERAL AGGREGATE \$ PRODUCTS-COMP/OP AGG \$ PERSONAL & ADV INJURY \$ EACH OCCURRENCE \$ FIRE DAMAGE (Any one fire) \$ MED EXP (Any one person) \$
	<b>AUTOMOBILE LIABILITY</b> <input type="checkbox"/> ANY AUTO <input type="checkbox"/> ALL OWNED AUTOS <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> HIRED AUTOS <input type="checkbox"/> NON-OWNED AUTOS				COMBINED SINGLE LIMIT \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE \$
	<b>GARAGE LIABILITY</b> <input type="checkbox"/> ANY AUTO				AUTO ONLY - EA ACCIDENT \$ OTHER THAN AUTO ONLY: EACH ACCIDENT \$ AGGREGATE \$
	<b>EXCESS LIABILITY</b> <input type="checkbox"/> UMBRELLA FORM <input type="checkbox"/> OTHER THAN UMBRELLA FORM				EACH OCCURRENCE \$ AGGREGATE \$
	<b>WORKERS COMPENSATION AND EMPLOYERS' LIABILITY</b> THE PROPRIETOR/PARTNERS/EXECUTIVE OFFICERS ARE: <input type="checkbox"/> INCL <input type="checkbox"/> EXCL				STATUTORY LIMITS EACH ACCIDENT \$ DISEASE - POLICY LIMIT \$ DISEASE - EACH EMPLOYEE \$
B	<b>OTHER Pollution Legal Liab. Sudden/Gradual</b>	PLL 5873580 PLL 5293088	10/01/95 10/01/95	10/01/96 10/01/96	15M each loss/15M Total All Loss 2M each loss/ 2M Total All Loss

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS This Certificate certifies that the policy to which the Certificate applies provides Liability Insurance Covering Bodily Injury and Property Damage in connection with the Insured's obligation to demonstrate financial responsibility under Section 266.16 of the Colorado Hazardous Waste Regulation C.R.S. 1973 As Amended

**CERTIFICATE HOLDER**

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Hazardous Material and Waste  
Management Division  
1216 East 11th Avenue  
Denver, CO 80220

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AUTHORIZED REPRESENTATIVE

*Richard G. Diccianni*