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FEB 22 2013

Christopher A. Lund, P.E.
Vice President
GBB Solid Waste Management Consultants and Receiver
850 Arlington Boulevard, Suite 304
Fairfax, VA 22031-4620

RE: Ordot Dump – Request to Approve Use of Alternative Final Cover Design, Letter
Dated January 21, 2013

Hafa Adai Mr. Lund:

The Guam Environmental Protection Agency (Guam EPA) is in receipt of the Memorandum, updated January 4, 2013, "Ordot Dump Closure – Task 5 – Evaluation of Site Development Alternatives" transmitted by the subject letter on January 21, 2013. The letter requests Guam EPA's approval of Option 1 which is an alternative final cover design consisting of a *Geocell Reinforce Soil Cover over a Geomembrane*.

As you are aware, the proposed Option 1 alternative final cover design was presented and discussed during a technical meeting with the Receiver, United States Environmental Protection Agency, Region IX (USEPA), and Guam EPA in San Francisco and on Guam last July and November 2012. A courtesy draft Memorandum was provided by the Receiver on September 7, 2012.

Guam EPA in consultation with USEPA Region IX and its contractor CH2M HILL has reviewed the January 4, 2013, update to the September 7, 2012 Memorandum. Based on the analysis presented in Section 3.0, Guam EPA deems that the Receiver has met the equivalency requirements for filtration and erosion layers pursuant to Guam EPA's Solid Waste Rules and Regulations (GSWRR), Title 22, Division 4, Chapter 23, Article 6, §23601(b)(1) and (2), respectively. We understand that the preferred cover alternative will be placed over a re-graded geometry that will flatten the steep side slopes of the

dump reducing the number of benches as part of the construction of the capping system for closure.

Therefore, pursuant to §23601(b) of the GSWRR, Guam EPA hereby approves the propose Option 1 alternative final cover design for the Ordot Dump closure.

Should have any questions regarding this letter, please feel free to contact Vincent J. Pereira at (671) 475-1658/9.

Senseramente,



ERIC M. PALACIOS
Administrator

cc: Ms. Karen Ueno, USEPA Region IX