

Dawn Bartel

From: Brian Helminger <brian.helminger@hvmsd.org>
Sent: Monday, August 26, 2019 11:40 AM
To: bruce siebers; Dave Casper; John Sundelius; kcoffey238@gmail.com; Pat Hennessey
Cc: Dawn Bartel
Subject: Public comments - Feasibility study on NW landfill cell
Attachments: doc01437420190826112452.pdf

Commissioners:

Attached are two documents related to the proposed landfill expansion in Little Chute. The public comment period is now closed. No action is necessary at this time but I was cc'd on both and this issue may require discussion by HOVMSD in the future. For now, its being supplied simply for your review.

Brian Helminger
District Director

Heart of the Valley
Metropolitan Sewerage District
801 Thilmany Road
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August 8, 2019

Ms. Jacqueline Marciulionis
Wisconsin Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54313-6727

Review No. 2019-044

Dear Ms. Marciulionis:

Subject: NR-121 SSA Plan Conformance – Outagamie County Northwest Landfill Feasibility Study

The East Central Wisconsin Regional Planning Commission, which oversees the WDNR's NR-121 Sewer Service Area Planning Program within its 10-county area, has reviewed the draft *Feasibility Report for the Outagamie County Northwest Landfill* (Project I.D.:18O002.30) dated September, 2018.

Based on our review, East Central finds that the recommended plan's proposal for conveying leachate from the proposed Northwest Landfill to the City of Appleton WWTF via a connection to the City of Appleton sanitary sewer system **IS NOT in conformance with the current Appleton Sewer Service Area Plan or the Heart of the Valley Sewer Service Area Plan**. At this time, the entire footprint of the Outagamie County Landfill Facility lies within the Heart of the Valley Sewer Service Area; and, **therefore, this plan dictates that all leachate flows from the proposed Northwest Landfill be routed through the Village of the Little Chute and then to the Heart of the Valley MSD for treatment.**

In order for the Northwest Landfill Feasibility Study to be in conformance, amendments would need to be requested and approved to both of these Sewer Service Plans, assuming that such amendments meet all standards and criteria as listed in the SSA plan document (plan documents can be found here: <https://www.ecwrpc.org/programs/community-facilities/ssa/>).

If there any questions regarding these comments, or to discuss details of the SSA amendment process, please contact me at (920) 751-4770 or via email at efowle@ecwrpc.org.

Sincerely,



Eric W. Fowle
Executive Director

c: Brian Van Straten, Outagamie County Director of Solid Waste
Brian Helminger, Heart of the Valley Metropolitan Sewerage District
Paula Vandehey, Public Works Director - City of Appleton
James Fenlon, Administrator – Village of Little Chute
Todd Verboomen, ECWRPC



August 16, 2019

Ms. Jacqueline Marciulionis
Wisconsin Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54313-6727

Dear Ms. Marciulionis,

The Village of Little Chute has reviewed the draft Feasibility Report for the Outagamie County Northwest Landfill (Project ID 180002.30). Our community's comments are outlined below and corresponding exhibits have been attached.

1. **Benefit of the Outagamie County Landfill.** The Village of Little Chute recognizes the benefits and opportunities that exist with regards to the potential of the Northwest Landfill (NWLFL). Capable of as many as 80 acres and more than 12 million cubic yards of airspace, the benefits to the entire Northeast Wisconsin Region and the more than 700,000 residents is considerable. In addition, as a municipal waste hauler, the Village of Little Chute recognizes the benefits of a waste facility located near a growing and bustling metropolitan area as the Fox Cities. Given those benefits, the Village of Little Chute recognizes the important due diligence that must occur to ensure the view points and general quality of life factors of the local municipalities, residents, and businesses are considered when taking into account the important analysis that is currently being conducted on such a large facility.
2. **Local Zoning and Conditional Use Requirements.** Per the Village of Little Chute Municipal Code, the NWLFL will require a conditional use permit. For reference, the Village Code related to Conditional Uses can be found in Section 44 Article IV and is attached here as **EXHIBIT A**. Under that section of municipal code, it should be noted that Section 44-123 provides guidance on the validity of the conditional use process given the timing of the siting process.
3. **Traffic considerations of the Outagamie County Landfill.** The tables provided in the draft feasibility study, particularly table 11-4, indicate that service populations and waste generation will increase over the next two decades. The draft feasibility study indicates that 200-300 vehicles a day access the current facility. Recently, the Village of Little Chute has been working with the Outagamie County Highway Department regarding concerns Outagamie County has for County Highway OO and Holland Road intersection. It should be noted in the review of the feasibility study that Outagamie County has highlighted concerns regarding capacity and delay at this intersection.
4. **Leachate transmission.** As outlined by East Central Regional Planning Commission, the current proposal to transport leachate to the City of Appleton's WWTF is not in conformance with the Sewer Service Area Plan or the Heart of the Valley Sewer Service Area Plan. Correspondence from the commission has been attached as **EXHIBIT B**.
5. **Leachate Generation.** Table 6-2 illustrates projected leachate generation rates for the NWLFL and is attached as **EXHIBIT C**. As the table illustrates, the projections show that at the greatest projected generation rates, the NWLFL would produce approximately 23,000 gallons of leachate daily, or slightly less than 700,000 gallons of leachate monthly. According to leachate amounts reported by Outagamie County Solid Waste, the Northeast Landfill (NELF) has produced monthly averages of 938,403 gallons of leachate in 2015 (March through December), a monthly

average of 1,049,011 gallons of leachate in 2016, a monthly average of 970,563 gallons of leachate in 2017, a monthly average of 1,317,728 gallons of leachate in 2018, and a monthly average of 933,075 gallons of leachate in 2019. It should be noted that between September of 2018 and present, the meters that have been installed to measure total flow of leachate at the NELF have failed. The levels noted above during that timeframe are simply based upon supervisory control and data acquisition (SCADA) tools that measure pump run times, which is not an industry standard for the measurement of flows. In summation, it would seem that the projections of the NWLF are not in line with what the NELF is currently experiencing for leachate generation and should be considered when analyzing best practices for the management of leachate generation at the NWLF.

6. **Leachate pretreatment.** Given the transmission concerns outlined by East Central Regional Planning Commission and the projected leachate to be generated by the NWLF, when combined with what is already and will continue to be generated by the NELF, indicates that a leachate pretreatment system should be considered as a requirement for the NWLF. A pretreatment system would seemingly provide effective treatment to both facilities, creating an economic and utility benefit for the entire region.

While there are other concerns that will certainly be present of the NWLF, such as litter control, odor, and pest management, the above comments illustrate the most relevant to the draft Feasibility Report at this time. Perhaps our largest concern is that the benefits of the regional facility are met with the appropriate controls to limit the fiscal and operational impacts on the local jurisdiction in which the facility is located.

Most importantly, the Village of Little Chute wants to ensure the Department that we are supportive of the NWLF and are well aware of the regional benefits that this facility will provide the over 700,000 residents. If there are any questions regarding these comments, please do not hesitate to contact me at 920-423-3850 or james@littlechutewi.org.

Sincerely,



James P. Fenlon
Administrator - Village of Little Chute

Cc: Brian Van Straten, Outagamie County Director of Solid Waste
Brian Helminger, Heart of the Valley Sewerage District Director
Michael Vanden Berg, Village of Little Chute President

**Table 6-2
Estimated Leachate Generation Rates**

Year of Operation	Phases being Filled	Open Area (acres)	Annual Infiltration from Open Areas (gallon)*	Final Covered Areas (acres)	Annual Infiltration from Final Covered Areas (gallon)**	Total Annual Infiltration (gallon)	Total Daily Leachate Generation (gallon)
1	Phase 1	20.0	3,258,288	0	0	3,258,288	8,900
2	Phase 1	20.0	3,258,288	0	0	3,258,288	8,900
3	Phases 1 & 2	35.8	5,832,336	0	0	5,832,336	16,000
4	Phases 1 & 2	35.8	5,832,336	9.5	257,845	6,090,180	16,700
5	Phases 1 & 2	42.7	6,956,445	9.5	257,845	7,214,290	19,800
6	Phases 1, 2 & 3	42.7	6,956,445	9.5	257,845	7,214,290	19,800
7	Phases 1, 2 & 3	36.3	5,913,793	15.9	431,550	6,345,343	17,400
8	Phase 4	49.2	8,015,388	15.9	431,550	8,446,939	23,100
9	Phases 2, 3 & 4	30.4	4,952,598	34.7	941,811	5,894,409	16,100
10	Phases 2, 3 & 4	46	7,494,062	34.7	941,811	8,435,874	23,100
11	Phases 2, 3 & 4	46	7,494,062	34.7	941,811	8,435,874	23,100
12	Phase 5	27.4	4,463,855	53.3	1,446,644	5,910,499	16,200
13	Filling Complete	27.4	4,463,855	53.3	1,446,644	5,910,499	16,200
14	Filling Complete	27.4	4,463,855	53.3	1,446,644	5,910,499	16,200
15	Filling Complete	0	0	80.7	2,190,322	2,190,322	6,000
16	Post Closure	0	0	80.7	2,190,322	2,190,322	6,000

* - Assumes 6" of infiltration in open areas per s. NR 5.

** - Assumes 1" of infiltration in closed areas per s. NR 512.12(3).

Prepared by: MRS

Checked by: RJM7