

11/30/11

To: Jon Taylor
Nevada Division of Environmental Protection
Bureau of Waste Management
Solid Waste Facilities Branch
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From: Robert Hannum
Property owner, Jungo Road, across the street from the proposed dump/landfill, ME, MBA

Reason: Commentary on permit application for the Jungo Landfill (dump)

Dear Mr. Taylor,

1. **Introduction:** I am not sure if you remember the couple of conversations we had on this topic about 1.5 years ago and about my wondering of why there is no call for an Environmental Impact Study (EIS) of this dump/landfill or why there would even be a possibility that Recology would be allowed to get around the 100 feet restriction in terms of being too close to the aquifer. So, you stated that I need to wait until you sent out the final verdict on allowing or not allowing Recology to go forward and that I would have to wait until this went out for public involvement. If you do not remember, my name is Robert Hannum and I own the land just across the street from the proposed dump/landfill site, parcel number 005-412-10. This would be a stone's throw from the dump/landfill and that is taking into account the westerly winds and my weak arm. I have over 18 years as a mechanical engineer and received an MBA about 10 years ago. I have researched this important topic deeply and have an above average knowledge on landfills because for one company, I helped to develop liner monitoring systems. I would only hope one day to be as good as Charles Schlarb, who also sent you some notification, but I feel that my understanding of the situation is more than adequate.

2. **Introduce my group:** I would like to be considered a member of the local community on Jungo Road, Winnemucca in general and of the Nevadans Against Garbage (NAG) but feel I could hardly keep up with their efforts to date to be considered anything but a junior member. But since this is so close to my property, I would just like to mainly be recognized as a property owner that was not even officially recognized enough to locate or inform of this dump going in and how this affects me and my community.

3. **Comments/concerns:** I would like to make this as clear and up front as I possibly can on an environmentally focused direction. I have the following three concerns:

1. The distance of the bottom of the proposed dump/landfill and the top of the aquifer that is below it. In the regulations of the NDEP, it is stated that the minimum distance should be 100 feet. Currently, it is less than 40 feet. I saw that you wrote to Recology about this issue and they

responded. And now you are approving their proposal. I consider this a complete disgrace. Unless you have never understood the true workings of a dump/landfill or had any prior knowledge, you would know for a fact that all dumps/landfills create a toxic poison called leachate. It is a poison, because it causes nasty things to happen to you if you drink it like cancer, illness.. etc. (I can give you references upon request, but I noticed a bunch of them in Charles Schlarb's response, so why waste your time on it). The next thing that you must be aware of is the fact that all current dump/landfill designs leak, even this one. You must or should know that once an aquifer is contaminated, it is very unlikely to be able to be cleaned (meaning impossible). Since my property is just across the road, the water that I will be drawing from the aquifer will lower the pressure and draw in water from the surrounding area as time goes on. So, you must know that through head pressure changes and osmosis, my water will eventually be tainted by the dump/landfill poison.

I believe that this is a very serious issue. Knowing that this is the case, you are still allowing the permit to move forward. If you know that the dump/landfill is going to poison my water and did nothing to stop it, I believe this is negligence. Worse, knowingly allowing harm to come to individuals is criminal negligence. And since I have plans to invest my future in that property and location, I will have no other option than to take the proper legal action with all organizations and individuals involved. I would prefer not to, but if forced to, I must.

2. Seismic Zone. The area in question is in an area that sees seismic activity. If you do not know what happens to a mud-like/sandy land mass similar to what is at the proposed dump/landfill site, I do. It turns into a liquid and items sitting on top of them sink. How do I know? I live in the bay area and I have seen it. Sandy or "old landfill sites" liquefied and buildings sank. Since the bottom of a dump is plastic lining, I see this both tearing large holes in the bottom and sinking ever closer to the aquifer. I would even imagine that eventually the bottom will be below the top of the aquifer creating a very toxic underground pool that will accelerate the tainting of the water supply as mentioned above, under item 1.

3. Pooling of water in the valley. Out of the many times that I have been to my property, I have seen very large pulls of water in the proposed landfill area. These were very large and could be described as several inches deep. In talking to people who have seen larger, deeper pools of water, the depth could be as high as 4 feet. If the proposed dump/landfill is a very large hole in the ground filling up with garbage and creating toxic liquid, would this not float out a very large amount of toxic debris across the valley? What is Recology going to do to fix that problem? What could they do to guarantee that what they did would clean up the surrounding area?

4. **Solutions:** Very simply put, I only see a couple of solutions to the issues that I and others have similarly raised, revoke the permit on environmental disaster issues. If Recology wants to continue, they should be mandated to pay for an independent party to do an Environmental Impact Study to show how there is no way they can design a dump/landfill that will not ruin the aquifer or the environment for generations to come. All leachate is toxic, all landfills generate it, all landfills leak, and once an aquifer is tainted, it is impossible to fix. On a more personal level, my solution to your position is for you to do your job, or find another one. You are either ignoring the loads of documents that are

coming your way or you do not understand them. Either way, this kind of reaction to this situation means nothing less than incompetence. And legally, you are signing off on this permit and I will remember this when I will be forced to take legal action against this criminal negligence.

Best Regards,

Rob Hannum

Local Property Owner.

<http://ndep.nv.gov/bwm/mailto:jtaylor@ndep.nv.gov?subject=jungo>