

Lawrence, Kansas 3-9-2009

Mr. Paul Clark
Allied Environmental Consultants, Inc.
The Anawalt House
1109 N. Topeka
Wichita, KS 67214

Dear Mr. Clark,

RE: Your letter, dated Dec. 23, 2008, requesting approval for a new waste disposal cell on the existing Cornejo C&D landfill in Wichita, KS

The above-cited letter, consisting of less than two pages of information and one location map, was received by the Kansas Geological Survey (KGS) for review. The information provided dealt only with the soils at the landfill site and was deemed minimal by KGS personnel for rendering a review and opinion regarding the requested expansion of this landfill, especially given that it is located within the City of Wichita (between 31st St. South and Kansas Turnpike I-35), immediately next to the Arkansas River (both attributes not ideal for a landfill location, to say the least). Therefore, KGS requested additional information about that C&D landfill from Kansas Department of Health and Environment (KDHE) and Sedgwick County Department of Natural Resources offices.

Information sent by Sedgwick Co. Dept. of Natural Resources on March 2, 2009, stated that the existing C&D landfill was grand-fathered in and did not have to comply with new construction requirements involving installation of monitoring wells or liners for new C&D landfills. However, further KGS-KDHE discussions about this matter revealed that a number of monitoring wells exist in the vicinity of the landfill, and KGS has obtained copies (from KDHE) of the 11th and 13th groundwater sampling reports, prepared by Geotechnical Services, Inc. (GSI) for Cornejo and Sons, Inc., dated November 12, 2007, and November 7, 2008, respectively.

Examination of those GSI reports indicated that four monitoring wells (MW-1, MW-2, MW-3, and MW-4) exist within the landfill property and are sampled periodically for groundwater chemical analyses. The report summary for the September 28, 2007, sampling indicated that the total arsenic concentrations for MW-1, MW-3, and MW-4 exceeded the KDHE Tier 2 Risk-Based Standards for Kansas (RSK) value of 0.01 mg/L for the non-residential groundwater pathway scenario, and the total lead concentrations in MW-1 and MW-4 exceeded the KDHE Tier 2 RSK value of 0.015 mg/L for the non-resident groundwater pathway scenario. The report summary for the September 25, 2008 sampling (the latest available) indicate that in MW-2 vinyl chloride exceeded the KDHE regulatory

groundwater pathway concentration of 2.0 micrograms per liter. (Vinyl chloride was not previously detected in the four monitoring wells during the previous monitoring events.) In addition, the total arsenic concentration for MW-1, MW-2, and MW-4 exceeded the KDHE Tier 2 RSK value of 0.01 mg/L for the non-resident groundwater pathway scenario, and the total lead for MW-1 and MW-2 exceeded the KDHE Tier 2 RSK value of 0.015 mg/L for the non-residential groundwater pathway scenario. Furthermore, the nitrate concentration in MW-3 exceeded the maximum EPA contaminant level concentration of 10 mg/L.

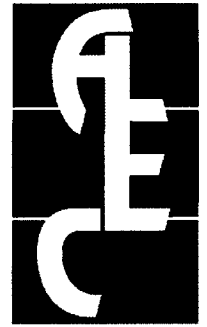
Given all the above information, it does not seem prudent for KDHE to approve or exempt the proposed new C&D waste disposal cell. Please let us know if you have questions. Thank you.

The above comments are based on regional geologic conditions and limited information available to the KGS at the time of writing and cannot be used in substitute for a detailed site characterization. Other geologic conditions, not discussed here, or for which the KGS has no knowledge, may affect the viability or safe operation of this facility or property. Geotechnical engineering and design are outside the purview of the KGS. It is the responsibility of the applicant to produce any detailed site characterizations, geotechnical or environmental testing, or design by a licensed professional geologist or engineer to complete the project.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Sophocleous', with a long horizontal line extending from the bottom left of the signature.

Marios Sophocleous
Senior Scientist



December 23, 2008

Kansas Geological Survey
University of Kansas
1930 Constant Avenue
Lawrence Kansas 66047-3726

Reference: Existing South CDR Landfill
Permit #773; Wichita, Kansas
Location Demonstration
AEC File No. 08023:0090

Dear Sirs:

This letter provides certain information submitted on behalf of Cornejo & Sons, Inc. for review relevant to Kansas Department of Health and Environment regulations for an approval or exemption the new Construction and Demolition (C & D) waste disposal cell proposed for the subject facility. This request is made according to K.A.R. 28-29-302(h).

The proposed C&D waste cell will be on an existing permitted Landfill property located in the portions of Sections 10 and 11, T28S, R1E, of the 6th Principal Meridian (see Figure 1). The local geology is summarized as follows, taken from the sources indicated:

According to the Soil Survey of Sedgwick County, Kansas, the site soils are classified as Ea – Elandco silt loam (nearly level slopes), Lb – Lincoln soils (nearly level slopes), Mb – Milan loam (3 to 6% slopes), and Vb – Vanoss silt loam (1 to 3% slopes). The Elandco silt loam is a deep, nearly level well drained soil on low terraces. The surface layer is a dark grayish brown silt loam approximately 40-inches in thickness. The subsoil is approximately 60-inches thick and is also a dark grayish brown silt loam.

The Lincoln soils are deep, nearly level somewhat excessively drained soils on flood plains adjacent to major stream channels. The surface layer is a dark brown loam approximately 8-inches in thickness. The substratum is approximately 60-inches thick and is brown fine and medium sand with a stratum of dark brown clay loam. The surface layer can range from fine sand to clay loam.

The Milan loam (3 to 6% slopes) is a deep, sloping well-drained soil on uplands. The surface layer is a brown loam approximately 8-inches in thickness. The subsoil is approximately 33-inches thick. The upper part is a reddish-brown, firm clay loam and the lower portion is a red, friable clay loam. The substratum is a yellowish-red clay loam with a depth of approximately 60-inches.

The Vanoss silt loam (1 to 3% slopes) is a moderately deep, gently sloping well drained typically located on uplands and terraces. The surface layer is brown silt loam approximately 13-inches in thickness. The subsoil is brown silt loam approximately 47-inches thick. The upper layer is friable and the lower later is firm to very firm. In some areas, the subsoil is redder.

The deposits underlying the surface soil are part of the Quaternary alluvium and terrace deposits, according to the Geology and Ground-Water Resources of Sedgwick County, Kansas (1965, Bull. 176).

Please respond to Allied Environmental Consultants, Inc., 1109 North Topeka, Wichita, Kansas 67214.
Thank you for attention to this matter.

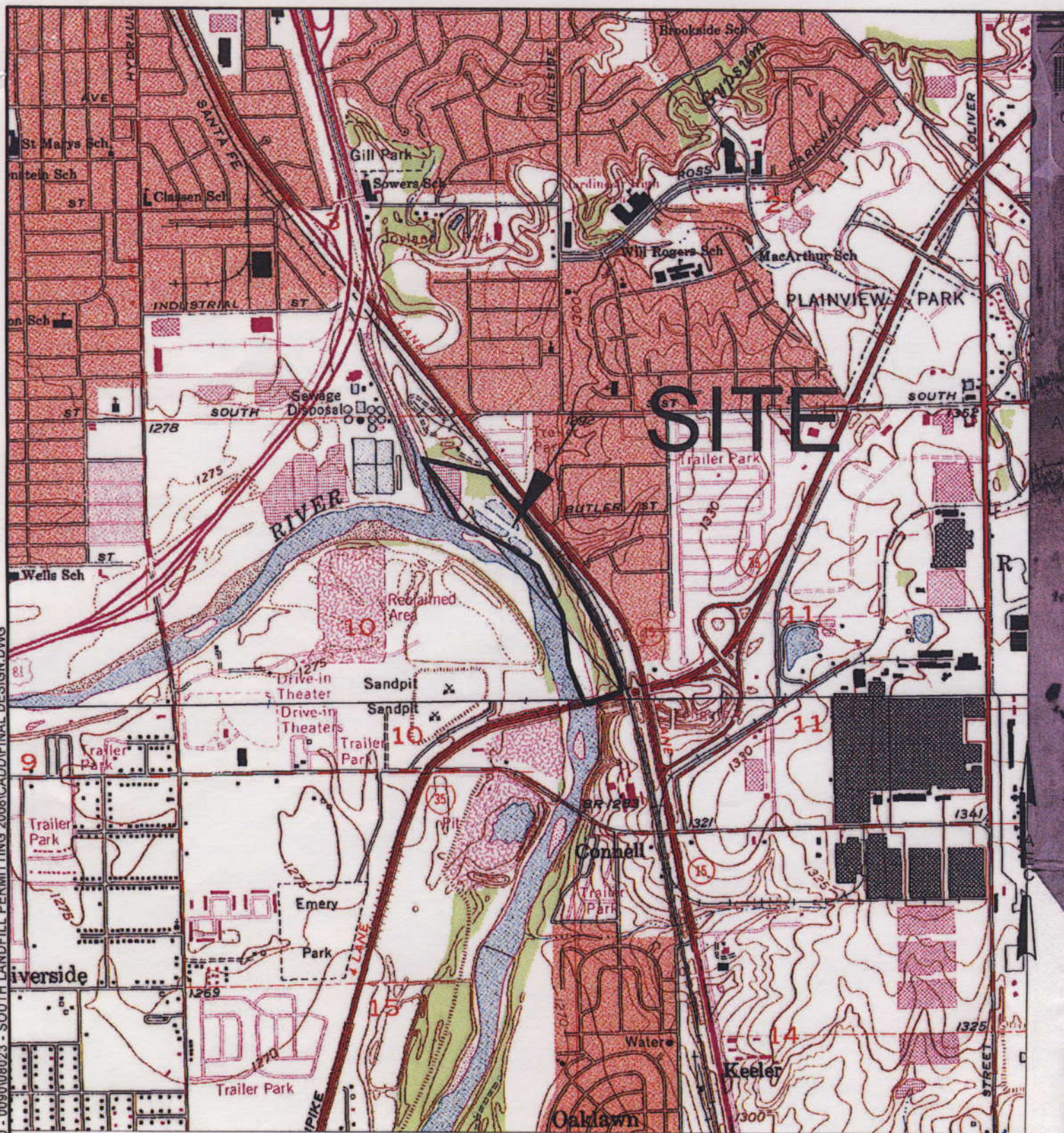
Sincerely,

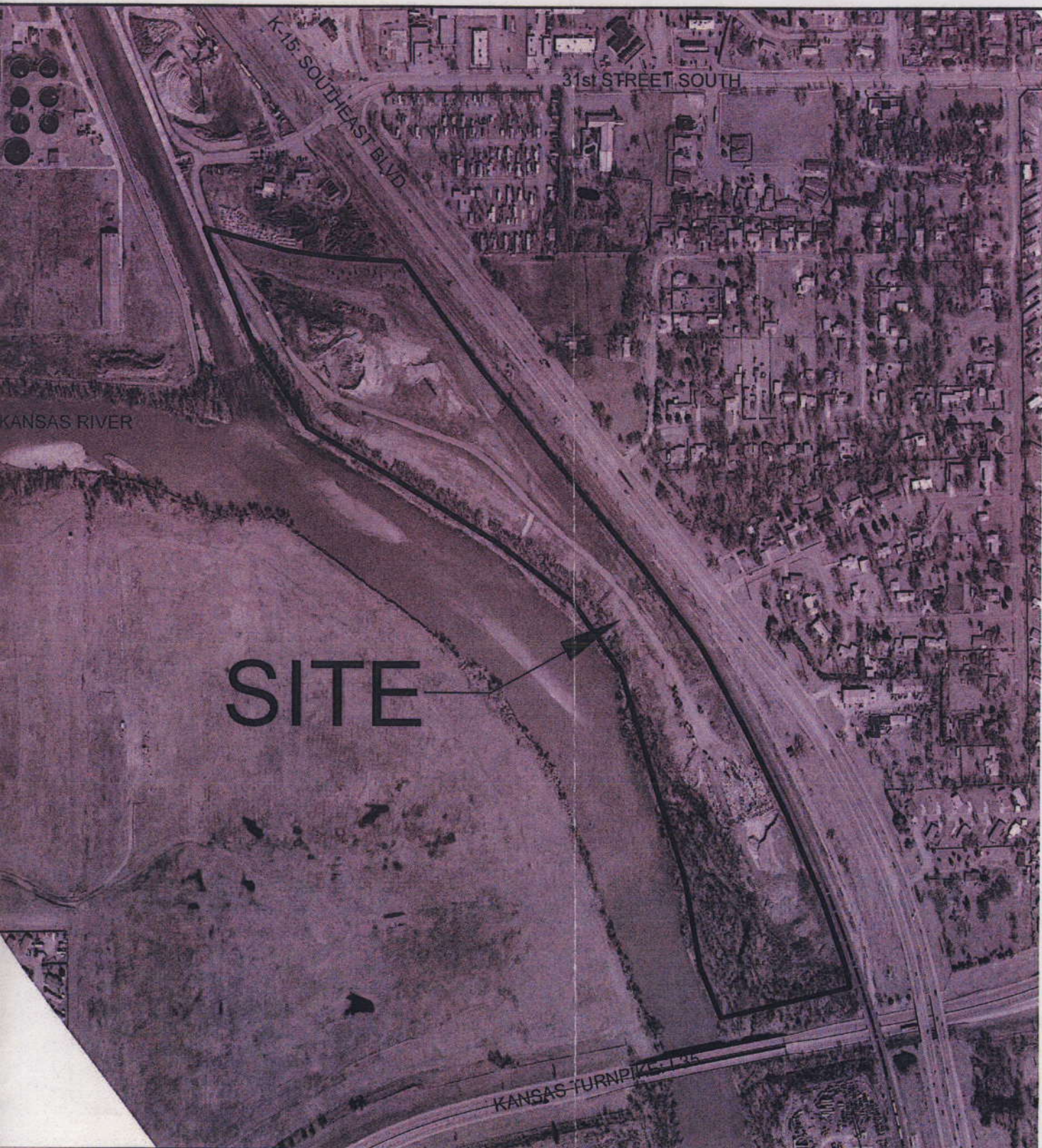
ALLIED ENVIRONMENTAL CONSULTANTS, INC.

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Paul R. Clark, P.G.
Project Manager

Enclosures





ALLIED
ENVIRONMENTAL
CONSULTANTS, INC.
1100 N. TOPEKA
WICHITA, KS 67214
(316) 262-6606

PROJECT: 08023:0090

SCALE: 1"=500'

DATE: 11-19-08

SITE LOCATION MAP

FIGURE

1

DWN BY: RJM

CHKD BY: TBF

SHT: 1.OF.1