

EXHIBIT B

April 29, 2024

Michelle Lastimoza, Administrator
Guam Environmental Protection Agency
Post Office Box 22439 GMF
Barrigada, Guam 96921

VIA ELECTRONIC MAIL: No Hardcopy to follow

ATTN: Glenn San Nicolas
Consent Decree Lead/ Solid Waste Program Director

SUBJECT: NOTICE - Ordot Dump Post-Closure Facility Annual Post-Closure Cost Estimate Update (Permit No. 22-001 PCC)

Hafa Adai Mr. San Nicolas,

The attached Ordot Dump Post-Closure Facility Post-Closure Cost Estimate (PCCE) is an update to the cost estimate value generated by the Guam Environmental Protection Agency and provided to the Receiver in a letter dated April 20, 2023. This update is performed and submitted in accordance with Guam Environmental Protection Agency (GEPA) Rules and Regulations for solid waste disposal, specifically Subsection 23703 (1), (2), (3), and supplemental direction and clarification through email correspondence provided January 24, 2024, from GEPA (email from Roland Gutierrez to Chris Lund at 11:47pm EST January 24, 2024).

This letter serves as notification to the Administrator that the updated estimate was computed in accordance with the GEPA direction ('GEPA Method') and has been placed in the operating record at the Ordot Dump Post-Closure Facility. The GEPA method, or direction, requires only that the prior years' calculated post closure cost estimate value be increased by the required annual inflation index only.

The value of the updated cost estimate using the GEPA method resulted in an increase in the amount of financial assurance required to be provided under part (b) of Subsection 23703 as a result of the inflationary increase. The annual inflation increased the cost estimate from \$31,322,260¹ to \$ 32,150,981.00 or by \$ 828,721.

On March 28, the Bureau of Economic Analysis (BEA) published its latest version of Table 1.1.9 Implicit Price Deflators for Gross Domestic Product which is the required index to use for inflation adjustments. This update



RECEIVER



Gershman, Brickner & Bratton, Inc.
8300 Boone Blvd.
Suite 500
Vienna, VA 22182



Main: (703) 573-5800



hello@gbbinc.com



www.gbbinc.com



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provided the Implicit Price Deflators with Gross National Product (GNP). The attached excel spreadsheet provides not only the updated version of the post-closure cost estimate calculated to using the GEPA Method, it also provides the PCCE calculated in a number of ways that takes into account important significant differences between the GEPA Method and what we propose are more appropriate estimates that take into account changes to rates charged by GWA that accurately reflect costs for 2024, and remaining years of post-closure care. We have also added tabs to provide the annual inflation adjustment (AIA) for 2023. The **new tabs** in the excel spreadsheet for this 2024 Annual Update are described below:

1. **Tab: Table 10-1 2023 Update:** This tab provides an updated version of Table 10-1 originally used in the PCCP application. The PCCE reflects 22.25 years remaining post-closure care. **PCCE = \$22,553,131.**
2. **Tab: PCC Costs – 2023 Update:** This tab provides the basis for the Table 10-1 2023 Update tab. Note, the sewer discharge fee was adjusted to reflect the change to \$14.72 per 1,000 gallons. The daily volume is the same (48,168 gpd) used in the PCCP application.
3. **Tab: Table 10-1 2023a Update:** This tab provides an updated version of Table 10-1 originally used in the PCCP application. The PCCE reflects 22.25 years remaining post-closure care. This version uses the average day flow from 2016 through 2023 (58,292 gpd) and the new reduced sewer discharge fee of \$14.72 per 1,000 gallons. **PCCE = \$23,823,916.**
4. **Tab: PCC Costs – 2023a Update:** This tab provides the basis for the Table 10-1 2023a Update tab. Note, the sewer discharge fee was adjusted to reflect the change to \$14.72 per 1,000 gallons. The daily volume is the average from 2016 through 2023 (58,292 gpd).
5. **Tab: GEPA Method:** This uses GEPA's method for estimating the PCCE. It simply takes the prior year PCCE and adds inflation. It does not reflect a reduction in the number of years remaining in post-closure care nor does it reflect the reduced sewer discharge fee now used. **PCCE = \$32,150,981.**
6. **Tab: BEA GDP Table 1.1.9 Mar 2024:** This tab provides the data source for the AIA (2.65% for 2023).

Since Table 10-1 tabs reflect a reduced PCCE based on the years remaining, there is a substantial reduction between these estimates from the prior year, 2023 and the 2024 estimate using the GEPA method. In accordance with §23703 (4) the owner or operator may 'reduce the post-closure cost estimate and the amount of financial assurance provided under Subsection (b) of this §23703 if the cost estimate exceeds the maximum costs of post-closure care remaining over the post-closure care period.'

We believe the drop in leachate treatment rates, decreasing remaining years, and significant drop in leachate volumes is compelling justification to support reduction the PCCE and the amount of financial



assurance to either of the values presented above, and we are requesting GEPA reconsider its methodology for PCCE computation and accept one of these values.

Responsible Official signature is provided below and the updated Post-Closure Cost Estimate is included as an attachment to this notification. The Facility continues to operate under the conditions of the existing Permit.

Please contact Chris Lund of GBB at (703) 853-7806 if you have any questions or need additional information.

Sincerely,

Gershman, Brickner & Bratton, Inc.

Christopher Lund, P.E.
Receiver Project Manager/ Exec. Vice President
Receiver Representative Gershman, Brickner & Bratton, Inc.
clund@gbbinc.com/(703)-853-7806

Enclosures:

Post-Closure Cost Estimate - 2024 Annual Update – PDF Format
Post-Closure Cost Estimate – 2024 Annual Update – Excel Format

ⁱ We note a slight discrepancy in the amount calculated in the GEPA Letter dated April 20, 2023, for the inflation adjusted 2023 Post Closure Cost Estimate of \$31,322,061.21 and our calculated amount.

1. Table 10-1 2023 Update

TABLE 10-1
ORDOT DUMP POST-CLOSURE FACILITY
POST-CLOSURE AND MAINTENANCE COST ESTIMATE 2023 - UPDATE (Prepared: March 29, 2024)

Item No.	Description	Estimated Quantity		2023 Unit Price	Annual Cost (2023 \$)
1	SITE SECURITY				
	Security Inspections and Reports - Quarterly	4	QTR	\$ 869	\$ 3,477
	Fence Maintenance/Replacement	1	YR	\$ 6,954	\$ 6,954
	Vegetation Maintenance	12	MO	\$ 8,692	\$ 104,310
			Subtotal		\$ 114,741
2	FINAL COVER MAINTENANCE				
	Vegetation Maintenance	12	MO	\$ 5,505	\$ 66,063
	Settlement	1	YR	\$ 20,398	\$ 20,398
			Subtotal		\$ 86,461
3	GROUNDWATER MONITORING PROGRAM				
	Semi-Annual Event	1	YR	\$ 91,667	\$ 91,667
	Annual Event	1	YR	\$ 101,911	\$ 101,911
	New Wells - 8 events	1	YR	\$ 10,931	\$ 10,931
	Well Repair/Replacement	1	YR	\$ 4,636	\$ 4,636
			Subtotal		\$ 209,145
4	LANDFILL GAS MONITORING PROGRAM				
	Quarterly Monitoring	4	QTR	\$ 2,955	\$ 11,822
	Probe Replacement	1	YR	\$ 5,911	\$ 5,911
			Subtotal		\$ 17,733
5	LANDFILL GAS COLLECTION AND CONTROL SYSTEM				
	Routine Inspections	1	YR	\$ 7,302	\$ 7,302
	Extraction Well Monitoring and Adjustments	1	YR	\$ 9,979	\$ 9,979
	Replacement of Header Pipe	1	YR	\$ 1,082	\$ 1,082
	Replacement of Extraction Wells	1	YR	\$ 0	\$ 0
	Flare System	1	YR	\$ 7,031	\$ 7,031
	Surface Emissions Monitoring	1	YR	\$ 1,082	\$ 1,082
	GEPA Permit Reporting	1	YR	\$ 4,327	\$ 4,327
	SVE System	1	YR	\$ 13,425	\$ 13,425
			Subtotal		\$ 44,227
6	DRAINAGE SYSTEM				
	Drainage Repairs amd Component Replacement	1	YR	\$ 18544	\$ 18,544
	Remove Debris and Vegetation	1	YR	\$ 13908	\$ 13,908
	ACOE/Wetlands Permit Compliance	1	YR	\$ 5988	\$ 5,988
	MSGP	1	YR	\$ 13328	\$ 13,328
			Subtotal		\$ 51,769
7	LCRS				
	Leachate Monitoring	1	YR	\$ 12,054	\$ 12,054
	LCRS O&M	1	YR	\$ 11,358	\$ 11,358
	Enhanced LCRS Monitoring	1	YR	\$ 1,738	\$ 1,738
	Leachate Contingency Plan	1	YR	\$ 9,179	\$ 9,179
	Sumps, Pumps and Other Component Replacement	1	YR	\$ 3,477	\$ 3,477
			Subtotal		\$ 37,807
8	ANNUAL REPORT				
	Annual Report	1	YR	\$ 8,692	\$ 8,692
			Subtotal		\$ 8,692
9	GSWA DIRECT PAY ITEMS				
	Leachate Disposal	1	YR	\$ 258,797	\$ 258,797
	Electrical Power	1	YR	\$ 28,975	\$ 28,975
	Technical Support to GEPA	1	YR	\$ 17,771	\$ 17,771
	Trustee	1	YR	\$ 5,795	\$ 5,795
			Subtotal		\$ 311,338

TABLE 10-1
ORDOT DUMP POST-CLOSURE FACILITY
POST-CLOSURE AND MAINTENANCE COST ESTIMATE 2023 - UPDATE (Prepared: March 29, 2024)

Item No.	Description	Estimated Quantity		2023 Unit Price	Annual Cost (2023 \$)
10	OTHER				
	Property Insurance	1	YR	\$ 3,825	\$ 3,825
	Performance Bond	1	YR	\$ 7,765	\$ 7,765
	Permit Fees	1	YR	\$ 487	\$ 487
	General Administration	1	YR	\$ 68,469	\$ 68,469
				Subtotal	\$ 80,546
11	COST ESTIMATES				
	Annual	1	YR	\$ 1,738	\$ 1,738
	5 Year Update	1	YR	\$ 1,159	\$ 1,159
				Subtotal	\$ 2,897
	Subtotal Annual Post-Closure Maintenance Cost				\$ 965,356
	Non-Routine Costs (5% of subtotal)				\$ 48,268
	ANNUAL POST-CLOSURE MAINTENANCE COST=				\$ 1,013,624
	TOTAL 22.25 YEAR POST-CLOSURE MAINTENANCE COST=				\$ 22,553,131

GENERAL:

- A. Post-closure cost estimate assumes a 30 year post-closure period of which 22.25 years remain. Estimated post-closure cost for 22.25 years is \$22,393,358. Post Closure Period Credit Assumed for period from March 1, 2016 to December 2023.

NOTES:

- 1.0 **ITEM 1 - SITE SECURITY:** Cost is based on quarterly inspections and reporting; replacement of 50 LF of fence each year @ \$139.04/LF; 100 hrs of vegetation maintenance each month at \$86.90/hr for technician and equipment.
- 2.0 **ITEM 2 - FINAL COVER:** In the 6 years since closure completion, there has been one isolated instance of differential settlement. Otherwise settlement has been found to be uniform across the surface of the Facility without having an effect on the final cover system to function as designed. Cost for Item 2 is based on quarterly inspections and reporting; full landfill surface topographic survey every 5 years @ \$84,576/event and annual settlement repair cost based on 100 CY of new fill each year @ \$34.75/CY.
- 3.0 **ITEM 3 - GROUNDWATER MONITORING:** Cost is based on 2021 Sampling and Analysis Plan which includes one semi-annual event each year, one annual event each year and eight quarterly events (Years 1 and 2) for 4 new monitoring wells. The 4 new monitoring wells will be sampled quarterly until 8 events have been completed after which time they will be added to the semi-annual and annual events. Sampling event cost assumptions are: (1) semi-annual events in Years 1 and 2 at \$55,568/event (\$6,946/well), (2) annual events in Years 1 and 2 at \$62,544/event (\$7,818/well), (3) quarterly events in Years 1 and 2 at \$38,080/event (\$9,520/well), (4) semi-annual events Years 3 to 30 at \$83,352/event (\$6,946/well) and (5) annual events Years 3 to 30 at \$93,816/event (\$7,818/well). Well repair/replacement assumes each monitoring well will be replaced once during the post-closure period @ cost of \$11,586 for each well.
- 4.0 **ITEM 4 - LANDFILL GAS MONITORING:** Cost is based on quarterly testing of 18 landfill gas monitoring wells. Well repair/replacement assumes each gas monitoring well will be replaced once during the post-closure period @ cost of \$9,849/well.
- 5.0 **ITEM 5 - LANDFILL GAS COLLECTION AND CONTROL SYSTEM:** In 2021, the flow at the flare has been approximately 125 scfm at 35% methane content (includes approximately 15 scfm of flow from the SVE system). This flow is approximately equal to 88 scfm at 50% methane content which is close to the LandGEM projected flow of 82 scfm for 2020. LandGEM projects a flow of 48 scfm at 50% methane content in 2025. The low end operating range for the flare is 50 scfm so it is projected the flare will cease operation in 2025 due to low flow and the unit will be placed in long-term storage. Costs are based on GCCS operation for 7 years with weekly inspection and reporting; monthly well-field tuning; \$2,897/yr for well-head, valve and flex hose replacement; 100 LF of header replacement each year @ \$46.35/LF; surface emissions monitoring will be performed annually; semi-annual and annual reporting to GEPA for air permit compliance; operation of SVE system will cease in 2025.
- 6.0 **ITEM 6 - DRAINAGE SYSTEM:** Costs are based on annual drainage system repairs @ \$18,538/yr (based on first 3 years of OMM); \$13,903/yr for debris and vegetation removal (96hrs @ \$144.82/hr); annual compliance reporting to ACOE for wetlands permit @ \$35,917/yr for a period of 5 years; MSGP weekly monitoring and quarterly/annual reporting.
- 7.0 **ITEM 7 - LCRS:** Leachate monitoring costs based on quarterly testing required by GWA; 48hrs/yr @ \$191.17/hr for vacuum truck to address contingency plan; replacement of one leachate pump every 5 years @ \$17,379/replacement.
- 8.0 **ITEM 8 - REPORTS:** Cost based on annual report preparation @ \$8,689/yr.
- 9.0 **ITEM 9 - GSWA DIRECT PAY ITEMS:** Costs are based on: leachate disposal costs based on 48,168 gpd @ \$14.72/1,000 gallons GWA commercial 2 discharge fee which is the highest discharge rate (a lower rate may be negotiated in the future); electrical power @ \$28,965/yr; technical support to GEPA @ \$100,000 for 1 year and \$90,000/yr for 4 additional years adjusted for inflation; cost for trustee \$5,793 per year.
- 10.0 **ITEM 10 - OTHER COSTS:** Costs are based on property insurance @ \$3,823/yr (actual); performance bond @ \$7,762/yr (actual); permit fees (air) @ \$580/yr and \$580/5yrs for renewal; permit fee (monitoring well permit renewals every 5 years) @ \$695/renewal; general administration cost is assumed to be 12% of the cost for Items 1 through 8.
- 11.0 **ITEM 11 - COST ESTIMATES:** Costs are based on \$1,738/yr for inflation cost adjustment reviews and \$5,793/5yrs for complete cost update.

2. PCC Costs – 2023 Update

	Monitoring	Inspection	Operations	Maintenance	Reporting	Subtotal (Annualized)	Notes
1 Site Security							
a. Security Inspections	NA	\$ 3,477	NA	NA	Included in Item 8. b.	\$ 3,477	Adjusted for CY2022 inflation
b. Security Fence Maintenance	NA	NA	NA	\$ 6,954	Included in Item 8. b.	\$ 6,954	Adjusted for CY2022 inflation
c. Security Vegetation Maintenance	NA	NA	NA	\$ 104,310	Included in Item 8. b.	\$ 104,310	Adjusted for CY2022 inflation
					Item 1 Subtotal	\$ 114,741	
2 Final Cover System:							
a. Vegetative Maintenance	NA	\$ 3,477	NA	\$ 62,586	Included in Item 8. b.	\$ 66,063	Adjusted for CY2022 inflation
b. Settlement	\$ 16,921	Included in Item 2. a.	NA	\$ 3,477	Included in Item 8. b.	\$ 20,398	Adjusted for CY2022 inflation
					Item 2 Subtotal	\$ 86,461	
3 Groundwater Monitoring Program:							
a. Semi-Annual Event	\$ 81,525	NA	NA	NA	\$ 10,141	\$ 91,667	Adjusted for CY2022 inflation
b. Annual Event	\$ 91,770	NA	NA	NA	\$ 10,141	\$ 101,911	Adjusted for CY2022 inflation
c. Remaining Initial 8 Rounds Monitoring for New Wells.	\$ 10,158	NA	NA	NA	\$ 773	\$ 10,931	Adjusted for CY2022 inflation
d. Well Repair, and Replacement. (12 Monitoring Wells)	NA	NA	NA	\$ 4,636	NA	\$ 4,636	Adjusted for CY2022 inflation
					Item 3 Subtotal	\$ 209,145	
4 Landfill Gas Monitoring Program:							
a. Routine Quarterly Monitoring (Monitoring wells LFGMW-14, -15, and - 16, at all three depths of SVE performance observation probe OP-10, at vertical SVE well TW-10, at horizontal well HW-3 (East), and at the GWA vault near HW-1)	\$ 10,663	NA	NA	NA	\$ 1,159	\$ 11,822	Adjusted for CY2022 inflation
b. Probe Replacement	NA	NA	NA	\$ 5,911	NA	\$ 5,911	Adjusted for CY2022 inflation
					Item 4 Subtotal	\$ 17,733	
5 Landfill Gas Collection and Control System:							
a. Routine Inspections	NA	\$ 7,302	NA	NA	Included in Item 5. g.	\$ 7,302	Adjusted for CY2022 inflation
b. Extraction Well Monitoring and Well-Head Adjustments	\$ 3,245	NA	\$ 5,409	\$ 1,325	Included in Item 5. g.	\$ 9,979	Adjusted for CY2022 inflation
c. Replacement of Header Piping	NA	NA	NA	\$ 1,082	Included in Item 5. g.	\$ 1,082	Adjusted for CY2022 inflation
d. Replacement of Extraction Wells	NA	NA	NA	NA	Included in Item 5. g.	\$ -	Adjusted for CY2022 inflation
e. Flare System	\$ 3,516	\$ 3,516	Included in Monitoring and Inspection.	NA	Included in Item 5. g.	\$ 7,031	Adjusted for CY2022 inflation
f. Surface Emission Monitoring	\$ 1,082	NA	NA	NA	Included in Item 5. g.	\$ 1,082	Adjusted for CY2022 inflation
g. GEPA Permit Reporting	NA	NA	NA	NA	\$ 4,327	\$ 4,327	Adjusted for CY2022 inflation
h. SVE System	\$ 4,636	\$ 3,767	Included in Monitoring and Inspection.	\$ 386	\$ 4,636	\$ 13,425	Adjusted for CY2022 inflation
					Item 5 Subtotal	\$ 44,227	
6 Drainage System:							
a. Drainage Repairs and Component Replacement	NA	Included in Maintenance	NA	\$ 18,544	Included in Item 8. b.	\$ 18,544	Adjusted for CY2022 inflation
b. Remove debris and Vegetation	NA	Included in Maintenance	NA	\$ 13,908	Included in Item 8. b.	\$ 13,908	Adjusted for CY2022 inflation
c. ACOE/Wetlands Permit Compliance	Included in Reporting	Included in Reporting	NA	NA	\$ 5,988	\$ 5,988	Adjusted for CY2022 inflation
d. MSG Stormwater Permit	\$ 7,533	NA	NA	NA	\$ 5,795	\$ 13,328	Adjusted for CY2022 inflation
					Item 6 Subtotal	\$ 51,769	
7 LCRS:							
a. Leachate Liquid Monitoring	Included in Reporting	NA	See Item 9. a.	NA	\$ 12,054	\$ 12,054	Adjusted for CY2022 inflation
b. LCRS O & M	NA	NA	\$ 11,358	NA	Included in Item 8. b.	\$ 11,358	Adjusted for CY2022 inflation
c. Enhanced LCRS Monitoring	\$ 1,159	NA	NA	NA	\$ 579	\$ 1,738	Adjusted for CY2022 inflation
d. Leachate Contingency Plan	NA	NA	\$ 9,179	NA	Included in Item 8. b.	\$ 9,179	Adjusted for CY2022 inflation
e. Sumps, Pumps, Other Component Replacement	NA	NA	NA	\$ 3,477	NA	\$ 3,477	Adjusted for CY2022 inflation
					Item 7 Subtotal	\$ 37,807	
8 Annual Reports:							

Ordot Post-Closure Care Cost Estimate Worksheet

		Monitoring	Inspection	Operations	Maintenance	Reporting	Subtotal (Annualized)	Notes
a.	Annual Report	NA	NA	NA	NA	\$ 8,692	\$ 8,692	Adjusted for CY2022 inflation
9	GSWA Direct Pay Items:					Item 8 Subtotal	\$ 8,692	
a.	Leachate disposal	Actual Costs					\$ 258,797	No change - 48,168 gpd at \$14.72/1,000 gal
b.	Guam Power Authority	Actual Costs					\$ 28,975	Adjusted for CY2022 inflation
c.	Technical Support to GEPA (\$100K/base year; \$90K/year thereafter.)	Actual Costs					\$ 17,771	Adjusted for CY2022 inflation
d.	Trustee	Actual Costs					\$ 5,795	Adjusted for CY2022 inflation
						Item 9 Subtotal	\$ 311,338	
10	Other:							
a.	Property Insurance	Actual Costs					\$ 3,825	Adjusted for CY2022 inflation
b.	Performance Bonds	Actual Costs					\$ 7,765	Adjusted for CY2022 inflation
c.	Permit Fees	Actual Costs					\$ 487	Adjusted for CY2022 inflation
d.	General Administrative Services (e.g., office, vehicles, support staff, etc.)	Estimate Costs Based on Contract.					\$ 68,469	Adjusted for CY2022 inflation
						Item 10 Subtotal	\$ 80,546	
11	Cost Estimates:							
a.	Annual adjustment for inflation						\$ 1,738	Adjusted for CY2022 inflation
b.	Whole-sale review every 5 years						\$ 1,159	Adjusted for CY2022 inflation
						Item 11 Subtotal	\$ 2,897	
	Subtotal Per Year						\$ 965,356	
	Subtotal Per Year x Non-Routine Contingency Services						\$ 48,268	5% of subtotal
	Total Cost Estimate						\$ 30,408,716	
	Total Annual Cost Estimate x Remaining PCM Years (PC started [April] 2016, confirm exact date from GEPA letter.)						\$ 22,553,131	Assumes 22.25 yrs remain

2021 Update	Implicit Price Deflator - GNP: 114.673 Q4 - 2020	
	Implicit Price Deflator - GNP: 121.684 Q4 - 2021	
	6.1139%	1.061139
2022 Update	Implicit Price Deflator - GNP: 121.684 Q4 - 2021	
	Implicit Price Deflator - GNP: 129.480 Q4 - 2022	
	6.4068%	1.064068
2023 Update	Implicit Price Deflator - GNP: 120.002 Q4 - 2022	
	Implicit Price Deflator - GNP: 123.177 Q4 - 2023	
	2.6458%	1.026458

3. Table 10-1 2023a Update

TABLE 10-1
ORDOT DUMP POST-CLOSURE FACILITY
POST-CLOSURE AND MAINTENANCE COST ESTIMATE 2023a - UPDATE (Prepared: March 29, 2024)

Item No.	Description	Estimated Quantity		2023 Unit Price	Annual Cost (2023 \$)
1	SITE SECURITY				
	Security Inspections and Reports - Quarterly	4	QTR	\$ 869	\$ 3,477
	Fence Maintenance/Replacement	1	YR	\$ 6,954	\$ 6,954
	Vegetation Maintenance	12	MO	\$ 8,692	\$ 104,310
				Subtotal	\$ 114,741
2	FINAL COVER MAINTENANCE				
	Vegetation Maintenance	12	MO	\$ 5,505	\$ 66,063
	Settlement	1	YR	\$ 20,398	\$ 20,398
				Subtotal	\$ 86,461
3	GROUNDWATER MONITORING PROGRAM				
	Semi-Annual Event	1	YR	\$ 91,667	\$ 91,667
	Annual Event	1	YR	\$ 101,911	\$ 101,911
	New Wells - 8 events	1	YR	\$ 10,931	\$ 10,931
	Well Repair/Replacement	1	YR	\$ 4,636	\$ 4,636
				Subtotal	\$ 209,145
4	LANDFILL GAS MONITORING PROGRAM				
	Quarterly Monitoring	4	QTR	\$ 2,955	\$ 11,822
	Probe Replacement	1	YR	\$ 5,911	\$ 5,911
				Subtotal	\$ 17,733
5	LANDFILL GAS COLLECTION AND CONTROL SYSTEM				
	Routine Inspections	1	YR	\$ 7,302	\$ 7,302
	Extraction Well Monitoring and Adjustments	1	YR	\$ 9,979	\$ 9,979
	Replacement of Header Pipe	1	YR	\$ 1,082	\$ 1,082
	Replacement of Extraction Wells	1	YR	\$ 0	\$ 0
	Flare System	1	YR	\$ 7,031	\$ 7,031
	Surface Emissions Monitoring	1	YR	\$ 1,082	\$ 1,082
	GEPA Permit Reporting	1	YR	\$ 4,327	\$ 4,327
	SVE System	1	YR	\$ 13,425	\$ 13,425
				Subtotal	\$ 44,227
6	DRAINAGE SYSTEM				
	Drainage Repairs and Component Replacement	1	YR	\$ 18,544	\$ 18,544
	Remove Debris and Vegetation	1	YR	\$ 13,908	\$ 13,908
	ACOE/Wetlands Permit Compliance	1	YR	\$ 5,988	\$ 5,988
	MSGP	1	YR	\$ 13,328	\$ 13,328
				Subtotal	\$ 51,769
7	LCRS				
	Leachate Monitoring	1	YR	\$ 12,054	\$ 12,054
	LCRS O&M	1	YR	\$ 11,358	\$ 11,358
	Enhanced LCRS Monitoring	1	YR	\$ 1,738	\$ 1,738
	Leachate Contingency Plan	1	YR	\$ 9,179	\$ 9,179
	Sumps, Pumps and Other Component Replacement	1	YR	\$ 3,477	\$ 3,477
				Subtotal	\$ 37,807
8	ANNUAL REPORT				
	Annual Report	1	YR	\$ 8,692	\$ 8,692
				Subtotal	\$ 8,692
9	GSWA DIRECT PAY ITEMS				
	Leachate Disposal	1	YR	\$ 313,191	\$ 313,191
	Electrical Power	1	YR	\$ 28,975	\$ 28,975
	Technical Support to GEPA	1	YR	\$ 17,771	\$ 17,771
	Trustee	1	YR	\$ 5,795	\$ 5,795
				Subtotal	\$ 365,732

TABLE 10-1
ORDOT DUMP POST-CLOSURE FACILITY
POST-CLOSURE AND MAINTENANCE COST ESTIMATE 2023a - UPDATE (Prepared: March 29, 2024)

Item No.	Description	Estimated Quantity		2023 Unit Price	Annual Cost (2023 \$)
10	OTHER				
	Property Insurance	1	YR	\$ 3,825	\$ 3,825
	Performance Bond	1	YR	\$ 7,765	\$ 7,765
	Permit Fees	1	YR	\$ 487	\$ 487
	General Administration	1	YR	\$ 68,469	\$ 68,469
				Subtotal	\$ 80,546
11	COST ESTIMATES				
	Annual	1	YR	\$ 1,738	\$ 1,738
	5 Year Update	1	YR	\$ 1,159	\$ 1,159
				Subtotal	\$ 2,897
	Subtotal Annual Post-Closure Maintenance Cost				\$ 1,019,750
	Non-Routine Costs (5% of subtotal)				\$ 50,988
	ANNUAL POST-CLOSURE MAINTENANCE COST=				\$ 1,070,738
	TOTAL 22.25 YEAR POST-CLOSURE MAINTENANCE COST=				\$ 23,823,916

GENERAL:

- A. Post-closure cost estimate assumes a 30 year post-closure period of which 22.25 years remain. Estimated post-closure cost for 22.25 years is \$22,393,358. Post Closure Period Credit Assumed for period from March 1, 2016 to December 2023.

NOTES:

- 1.0 **ITEM 1 - SITE SECURITY:** Cost is based on quarterly inspections and reporting; replacement of 50 LF of fence each year @ \$139.04/LF; 100 hrs of vegetation maintenance each month at \$86.90/hr for technician and equipment.
- 2.0 **ITEM 2 - FINAL COVER:** In the 6 years since closure completion, there has been one isolated instance of differential settlement. Otherwise settlement has been found to be uniform across the surface of the Facility without having an effect on the final cover system to function as designed. Cost for Item 2 is based on quarterly inspections and reporting; full landfill surface topographic survey every 5 years @ \$84,576/event and annual settlement repair cost based on 100 CY of new fill each year @ \$34.75/CY.
- 3.0 **ITEM 3 - GROUNDWATER MONITORING:** Cost is based on 2021 Sampling and Analysis Plan which includes one semi-annual event each year, one annual event each year and eight quarterly events (Years 1 and 2) for 4 new monitoring wells. The 4 new monitoring wells will be sampled quarterly until 8 events have been completed after which time they will be added to the semi-annual and annual events. Sampling event cost assumptions are: (1) semi-annual events in Years 1 and 2 at \$55,568/event (\$6,946/well), (2) annual events in Years 1 and 2 at \$62,544/event (\$7,818/well), (3) quarterly events in Years 1 and 2 at \$38,080/event (\$9,520/well), (4) semi-annual events Years 3 to 30 at \$83,352/event (\$6,946/well) and (5) annual events Years 3 to 30 at \$93,816/event (\$7,818/well). Well repair/replacement assumes each monitoring well will be replaced once during the post-closure period @ cost of \$11,586 for each well.
- 4.0 **ITEM 4 - LANDFILL GAS MONITORING:** Cost is based on quarterly testing of 18 landfill gas monitoring wells. Well repair/replacement assumes each gas monitoring well will be replaced once during the post-closure period @ cost of \$9,849/well.
- 5.0 **ITEM 5 - LANDFILL GAS COLLECTION AND CONTROL SYSTEM:** In 2021, the flow at the flare has been approximately 125 scfm at 35% methane content (includes approximately 15 scfm of flow from the SVE system). This flow is approximately equal to 88 scfm at 50% methane content which is close to the LandGEM projected flow of 82 scfm for 2020. LandGEM projects a flow of 48 scfm at 50% methane content in 2025. The low end operating range for the flare is 50 scfm so it is projected the flare will cease operation in 2025 due to low flow and the unit will be placed in long-term storage. Costs are based on GCCS operation for 7 years with weekly inspection and reporting; monthly well-field tuning; \$2,897/yr for well-head, valve and flex hose replacement; 100 LF of header replacement each year @ \$46.35/LF; surface emissions monitoring will be performed annually; semi-annual and annual reporting to GEPA for air permit compliance; operation of SVE system will cease in 2025.
- 6.0 **ITEM 6 - DRAINAGE SYSTEM:** Costs are based on annual drainage system repairs @ \$18,538/yr (based on first 3 years of OMM); \$13,903/yr for debris and vegetation removal (96hrs @ \$144.82/hr); annual compliance reporting to ACOE for wetlands permit @ \$35,917/yr for a period of 5 years; MSGP weekly monitoring and quarterly/annual reporting.
- 7.0 **ITEM 7 - LCRS:** Leachate monitoring costs based on quarterly testing required by GWA; 48hrs/yr @ \$191.17/hr for vacuum truck to address contingency plan; replacement of one leachate pump every 5 years @ \$17,379/replacement.
- 8.0 **ITEM 8 - REPORTS:** Cost based on annual report preparation @ \$8,689/yr.
- 9.0 **ITEM 9 - GSWA DIRECT PAY ITEMS:** Costs are based on: leachate disposal costs based on 58,292 gpd (average flow 2016 - 2023) @ \$14.72/1,000 gallons GWA commercial 2 discharge fee which is the highest discharge rate (a lower rate may be negotiated in the future); electrical power @ \$28,965/yr; technical support to GEPA @ \$100,000 for 1 year and \$90,000/yr for 4 additional years adjusted for inflation; cost for trustee \$5,793 per year.
- 10.0 **ITEM 10 - OTHER COSTS:** Costs are based on property insurance @ \$3,823/yr (actual); performance bond @ \$7,762/yr (actual); permit fees (air) @ \$580/yr and \$580/5yrs for renewal; permit fee (monitoring well permit renewals every 5 years) @ \$695/renewal; general administration cost is assumed to be 12% of the cost for Items 1 through 8.
- 11.0 **ITEM 11 - COST ESTIMATES:** Costs are based on \$1,738/yr for inflation cost adjustment reviews and \$5,793/5yrs for complete cost update.

4. PCC Costs – 2023a Update

	Monitoring	Inspection	Operations	Maintenance	Reporting	Subtotal (Annualized)	Notes
1 Site Security							
a. Security Inspections	NA	\$ 3,477	NA	NA	Included in Item 8. b.	\$ 3,477	Adjusted for CY2022 inflation
b. Security Fence Maintenance	NA	NA	NA	\$ 6,954	Included in Item 8. b.	\$ 6,954	Adjusted for CY2022 inflation
c. Security Vegetation Maintenance	NA	NA	NA	\$ 104,310	Included in Item 8. b.	\$ 104,310	Adjusted for CY2022 inflation
					Item 1 Subtotal	\$ 114,741	
2 Final Cover System:							
a. Vegetative Maintenance	NA	\$ 3,477	NA	\$ 62,586	Included in Item 8. b.	\$ 66,063	Adjusted for CY2022 inflation
b. Settlement	\$ 16,921	Included in Item 2. a.	NA	\$ 3,477	Included in Item 8. b.	\$ 20,398	Adjusted for CY2022 inflation
					Item 2 Subtotal	\$ 86,461	
3 Groundwater Monitoring Program:							
a. Semi-Annual Event	\$ 81,525	NA	NA	NA	\$ 10,141	\$ 91,667	Adjusted for CY2022 inflation
b. Annual Event	\$ 91,770	NA	NA	NA	\$ 10,141	\$ 101,911	Adjusted for CY2022 inflation
c. Remaining Initial 8 Rounds Monitoring for New Wells.	\$ 10,158	NA	NA	NA	\$ 773	\$ 10,931	Adjusted for CY2022 inflation
d. Well Repair, and Replacement. (12 Monitoring Wells)	NA	NA	NA	\$ 4,636	NA	\$ 4,636	Adjusted for CY2022 inflation
					Item 3 Subtotal	\$ 209,145	
4 Landfill Gas Monitoring Program:							
a. Routine Quarterly Monitoring (Monitoring wells LFGMW-14, -15, and - 16, at all three depths of SVE performance observation probe OP-10, at vertical SVE well TW-10, at horizontal well HW-3 (East), and at the GWA vault near HW-1)	\$ 10,663	NA	NA	NA	\$ 1,159	\$ 11,822	Adjusted for CY2022 inflation
b. Probe Replacement	NA	NA	NA	\$ 5,911	NA	\$ 5,911	Adjusted for CY2022 inflation
					Item 4 Subtotal	\$ 17,733	
5 Landfill Gas Collection and Control System:							
a. Routine Inspections	NA	\$ 7,302	NA	NA	Included in Item 5. g.	\$ 7,302	Adjusted for CY2022 inflation
b. Extraction Well Monitoring and Well-Head Adjustments	\$ 3,245	NA	\$ 5,409	\$ 1,325	Included in Item 5. g.	\$ 9,979	Adjusted for CY2022 inflation
c. Replacement of Header Piping	NA	NA	NA	\$ 1,082	Included in Item 5. g.	\$ 1,082	Adjusted for CY2022 inflation
d. Replacement of Extraction Wells	NA	NA	NA	NA	Included in Item 5. g.	\$ -	Adjusted for CY2022 inflation
e. Flare System	\$ 3,516	\$ 3,516	Included in Monitoring and Inspection.	NA	Included in Item 5. g.	\$ 7,031	Adjusted for CY2022 inflation
f. Surface Emission Monitoring	\$ 1,082	NA	NA	NA	Included in Item 5. g.	\$ 1,082	Adjusted for CY2022 inflation
g. GEPA Permit Reporting	NA	NA	NA	NA	\$ 4,327	\$ 4,327	Adjusted for CY2022 inflation
h. SVE System	\$ 4,636	\$ 3,767	Included in Monitoring and Inspection.	\$ 386	\$ 4,636	\$ 13,425	Adjusted for CY2022 inflation
					Item 5 Subtotal	\$ 44,227	
6 Drainage System:							
a. Drainage Repairs and Component Replacement	NA	Included in Maintenance	NA	\$ 18,544	Included in Item 8. b.	\$ 18,544	Adjusted for CY2022 inflation
b. Remove debris and Vegetation	NA	Included in Maintenance	NA	\$ 13,908	Included in Item 8. b.	\$ 13,908	Adjusted for CY2022 inflation
c. ACOE/Wetlands Permit Compliance	Included in Reporting	Included in Reporting	NA	NA	\$ 5,988	\$ 5,988	Adjusted for CY2022 inflation
d. MSG Stormwater Permit	\$ 7,533	NA	NA	NA	\$ 5,795	\$ 13,328	Adjusted for CY2022 inflation
					Item 6 Subtotal	\$ 51,769	
7 LCRS:							
a. Leachate Liquid Monitoring	Included in Reporting	NA	See Item 9. a.	NA	\$ 12,054	\$ 12,054	Adjusted for CY2022 inflation
b. LCRS O & M	NA	NA	\$ 11,358	NA	Included in Item 8. b.	\$ 11,358	Adjusted for CY2022 inflation
c. Enhanced LCRS Monitoring	\$ 1,159	NA	NA	NA	\$ 579	\$ 1,738	Adjusted for CY2022 inflation
d. Leachate Contingency Plan	NA	NA	\$ 9,179	NA	Included in Item 8. b.	\$ 9,179	Adjusted for CY2022 inflation
e. Sumps, Pumps, Other Component Replacement	NA	NA	NA	\$ 3,477	NA	\$ 3,477	Adjusted for CY2022 inflation
					Item 7 Subtotal	\$ 37,807	
8 Annual Reports:							

Ordot Post-Closure Care Cost Estimate Worksheet

		Monitoring	Inspection	Operations	Maintenance	Reporting	Subtotal (Annualized)	Notes	
a.	Annual Report	NA	NA	NA	NA	\$ 8,692	\$ 8,692	Adjusted for CY2022 inflation	
9	GSWA Direct Pay Items:								
a.	Leachate disposal	Actual Costs						\$ 313,191	No change - 58,292 gpd at \$14.72/1,000 gal
b.	Guam Power Authority	Actual Costs						\$ 28,975	Adjusted for CY2022 inflation
c.	Technical Support to GEPA (\$100K/base year; \$90K/year thereafter.)	Actual Costs						\$ 17,771	Adjusted for CY2022 inflation
d.	Trustee	Actual Costs						\$ 5,795	Adjusted for CY2022 inflation
						Item 8 Subtotal	\$ 365,732		
10	Other:								
a.	Property Insurance	Actual Costs						\$ 3,825	Adjusted for CY2022 inflation
b.	Performance Bonds	Actual Costs						\$ 7,765	Adjusted for CY2022 inflation
c.	Permit Fees	Actual Costs						\$ 487	Adjusted for CY2022 inflation
d.	General Administrative Services (e.g., office, vehicles, support staff, etc.)	Estimate Costs Based on Contract.						\$ 68,469	Adjusted for CY2022 inflation
						Item 10 Subtotal	\$ 80,546		
11	Cost Estimates:								
a.	Annual adjustment for inflation							\$ 1,738	Adjusted for CY2022 inflation
b.	Whole-sale review every 5 years							\$ 1,159	Adjusted for CY2022 inflation
						Item 11 Subtotal	\$ 2,897		
	Subtotal Per Year							\$ 1,019,750	
	Subtotal Per Year x Non-Routine Contingency Services							\$ 50,988	5% of subtotal
	Total Cost Estimate							\$ 32,122,134	
	Total Annual Cost Estimate x Remaining PCM Years (PC started April 2016.)							\$ 23,823,916	Assumes 22.25 yrs remain

2021 Update	Implicit Price Deflator - GNP: Q4 - 2020	114.673	
	Implicit Price Deflator - GNP: Q4 - 2021	121.684	
		6.1139%	1.061139
2022 Update	Implicit Price Deflator - GNP: Q4 - 2021	121.684	
	Implicit Price Deflator - GNP: Q4 - 2022	129.480	
		6.4068%	1.064068
2023 Update	Implicit Price Deflator - GNP: Q4 - 2022	120.002	
	Implicit Price Deflator - GNP: Q4 - 2023	123.177	
		2.6458%	1.026458

5. GEPA Method

2021 AIA		
	2021 PCCE	\$ 27,740,327
	IPD-GNP 2020 Q4	114.673
	IPD-GNP 2021 Q4	121.684
	2021 AIA (%)	6.11%
	2021 AIA (\$)	\$ 1,696,018
	2022 PCCE	\$ 29,436,345

2022 AIA		
	2022 PCCE	\$ 29,436,345
	IPD-GNP 2021 Q4	121.684
	IPD-GNP 2022 Q4	129.480
	2022 AIA (%)	6.41%
	2022 AIA (\$)	\$ 1,885,915.51
	2023 PCCE	\$ 31,322,260

2023 AIA		
	2023 PCCE	\$ 31,322,260
	IPD-GDP 2022 Q4	120.002
	IPD-GDP 2023 Q4	123.177
	2023 AIA (%)	2.65%
	2023 AIA (\$)	\$ 828,721
	2024 PCCE	\$ 32,150,981

6. BEA GDP Table (1.1.9 March 2024)

Table 1.1.9. Implicit Price Deflators for Gross Domestic Product

[Index numbers, 2017=100] Seasonally adjusted

Bureau of Economic Analysis

Last Revised on: March 28, 2024 - Next Release Date April 25, 2024

Line		2021				2022				2023				2023 Inflation
		Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	
1	Gross domestic product	107.668	109.305	110.92	112.848	115.135	117.671	118.962	120.093	121.261	121.766	122.762	123.271	
2	Personal consumption expenditures	106.547	108.174	109.673	111.487	113.574	115.568	116.902	118.098	119.309	120.044	120.814	121.35	
3	Goods	101.348	103.45	105.379	108.051	111.145	113.795	114.617	114.643	114.844	114.911	115.163	114.759	
4	Durable goods	97.844	101.218	103.593	105.894	108.072	108.435	109.214	108.764	108.521	108.547	107.332	106.38	
5	Nondurable goods	103.245	104.572	106.24	109.127	112.754	116.745	117.591	117.899	118.366	118.457	119.6	119.531	
6	Services	109.091	110.445	111.701	113.043	114.572	116.205	117.809	119.624	121.37	122.461	123.506	124.545	
7	Gross private domestic investment	105.514	106.528	108.074	110.457	112.891	115.431	117.389	118.176	119.228	119.087	119.557	120.292	
8	Fixed investment	105.881	106.92	108.772	111.042	113.626	116.227	118.098	119.14	120.384	120.37	120.89	121.62	
9	Nonresidential	102.377	102.43	103.555	105.438	107.135	109.07	110.673	111.545	113.278	113.334	113.581	114.138	
10	Structures	106.613	108.254	110.631	116.512	120.356	124.898	129.638	131.83	134.127	134.429	133.634	134.331	
11	Equipment	99.752	98.915	100.091	101.524	103.584	105.64	107.073	108.61	110.7	110.381	111.009	111.418	
12	Intellectual property products	102.745	102.901	103.374	103.876	104.286	104.992	105.446	105.158	106.326	106.61	106.985	107.609	
13	Residential	118.262	122.622	127.003	130.673	136.374	141.401	144.306	146.043	145.102	144.779	146.487	147.944	
14	Change in private inventories	---	---	---	---	---	---	---	---	---	---	---	---	
15	Net exports of goods and services	---	---	---	---	---	---	---	---	---	---	---	---	
16	Exports	106.518	111.128	113.718	115.581	120.539	126.104	123.075	121.326	121.359	120.169	121.362	120.703	
17	Goods	105.215	111.074	114.083	116.167	122.478	129.886	125.159	121.694	120.799	118.816	120.088	119.03	
18	Services	108.891	110.806	112.519	113.901	115.923	117.61	118.141	120.013	122.021	122.504	123.531	123.706	
19	Imports	102.425	105.452	107.052	108.876	112.364	115.284	114.025	112.795	112.426	111.052	111.145	111.275	
20	Goods	101.495	104.663	106.251	108.2	112.147	115.147	113.368	111.429	110.763	109.048	109.24	109.426	
21	Services	106.55	108.807	110.486	111.7	112.903	115.42	116.629	118.687	119.701	119.938	119.55	119.411	
22	Government consumption expenditures and gross in	110.707	112.381	113.918	115.759	118.109	121.271	122.113	123.086	123.548	123.221	124.756	125.336	
23	Federal	107.395	108.445	109.543	110.784	112.726	114.6	115.953	117.119	118.311	118.917	120.081	121.252	
24	National defense	107.443	108.582	109.704	111.059	113.494	115.983	116.8	117.838	118.805	119.356	120.596	121.991	
25	Nondefense	107.346	108.282	109.347	110.439	111.749	112.827	114.876	116.207	117.684	118.359	119.428	120.314	
26	State and local	112.77	114.848	116.664	118.889	121.503	125.482	126.005	126.858	126.855	125.936	127.707	127.913	
Addendum:														
27	Gross national product	107.591	109.225	110.838	112.765	115.05	117.582	118.872	120.002	121.168	121.673	122.668	123.177	2.6458%