EVOH Deployment Suitability Assessment No. 8

Bristol Integrated Solid Waste Management Facility

Solid Waste Permit No. 588

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EXECUTIVE SUMMARY

SCS Engineers (SCS) analyzed elevation data from settlement plates installed within the Solid Waste Permit (SWP) No. 588 Landfill to assess the suitability for deployment of the EVOH cover system. The settlement analysis considered three criteria established by the Virginia Department of Environmental Quality (VDEQ):

- **Criterion 1:** The rate of settlement of the waste has transitioned to a state of long-term secondary compression with the settlement varying approximately logarithmically with time.
- **Criterion 2:** Strain rate at all settlement plates is less than 1% per year, or a rate identified as consistent with secondary compression of municipal solid waste. Strain rate is defined here as the ratio of the change in vertical elevation of the surface of the waste at a given location to the thickness of the waste at that location per unit time.
- **Criterion 3:** Surface cracks due to settlement having a width less than 1-inch.

The EVOH deployment is to proceed once all three criteria have been satisfied or by the date of December 1, 2026, as outlined in the amendment to the Consent Decree between the Commonwealth of Viriginia and the City of Bristol, Virginia (Consent Decree).

To date, the analysis of the elevation data and inspection of the site condition show that none of the criteria have been fully satisfied. However, the proportion of settlement plates in compliance with Criterion 1 or Criterion 2 has increased since the start of the suitability assessments. Table 1 summarizes the findings for Criterion 1 and Criterion 2. Recent visual inspections of the site indicate that surface cracking is ongoing and Criterion 3 is also not satisfied. At this time, substantial ongoing settlement could compromise the integrity of the EVOH cover system.

Table 1 – Summary of Findings

Settlement Plate	Criterion 1	Criterion 2
SP-1	Satisfied	Not Satisfied
SP-2A	Satisfied	Not Satisfied
SP-3A	Satisfied	Satisfied
SP-4A	Satisfied	Satisfied
SP-5	Satisfied	Satisfied
SP-6	Satisfied	Satisfied
SP-7A	Satisfied	Satisfied
SP-8	Satisfied	Satisfied
SP-9A	Satisfied	Satisfied
SP-10[1]	Satisfied[1]	Satisfied
SP-11	Satisfied	Satisfied
SP-12	Not Satisfied	Satisfied

[1] The settlement plate SP-10 is believed to have been disturbed between the readings on 5/30/2025 and 6/27/2025. A correction factor was applied to account for the disturbance, see the discussion in Section 2.2.

1.0 INTRODUCTION

SCS has completed the eighth suitability assessment for deployment of the EVOH cover system at the City of Bristol, Virginia's (City's) Integrated Solid Waste Management Facility (ISWMF) SWP No. 588 landfill. The assessment is required by the Consent Decree as amended on March 21, 2024. Settlement data was analyzed based on the three criteria outlined in section 6.iv of Appendix A of the amended Consent Decree. The EVOH cover system deployment will proceed once all three settlement criteria are satisfied, indicating an acceptable rate of settlement, or by December 1, 2026, whichever date comes first.

Excessive settlement within the SWP No. 588 landfill will impact the integrity of the EVOH geomembrane, which is the most important component of the EVOH cover system. Problems include the formation of voids underneath the geomembrane as localized depressions form due to differential settlement. The resulting low areas dispersed across the geomembrane surface will disrupt stormwater drainage, and repairs would require cutting the geomembrane to place soil fill. Additionally, the geomembrane surface will fall relative to the top elevation of vertical pipes installed within the waste mass. Landfill gas wells and temperature probes will be affected at a minimum. Excessive settlement can render the wells and probes unreachable, requiring widespread adjustments and repairs.

The long-term success of the EVOH cover system requires an acceptable rate of settlement to maintain the system's overall integrity. In accordance with the amended Consent Decree, the following three criteria are used to assess the landfill's suitability for the EVOH deployment:

- **Criterion 1:** The rate of settlement of the waste has transitioned to a state of long-term secondary compression with the settlement varying approximately logarithmically with time.
- **Criterion 2:** Strain rate at all settlement plates is less than 1% per year, or a rate identified as consistent with secondary compression of municipal solid waste. Strain rate is defined here as the ratio of the change in vertical elevation of the surface of the waste at a given location to the thickness of the waste at that location per unit time.
- **Criterion 3:** Surface cracks due to settlement having a width less than 1-inch.

The three criteria are evaluated using elevation data from settlement plates positioned throughout the landfill. The City has completed monthly elevation surveys of the settlement plates since their installation in November 2022, and the compiled elevation data have been plotted on graphs for each operational settlement plate. Regression analysis was used to assess Criterion 1 by considering whether the data shows a linear or logarithmic (decreasing rate with time) trendline. Calculations were completed and tabulated to consider if current strain rates satisfy Criterion 2. Additionally, the landfill surface was monitored by personnel for evidence of surface cracking to assess Criterion 3.

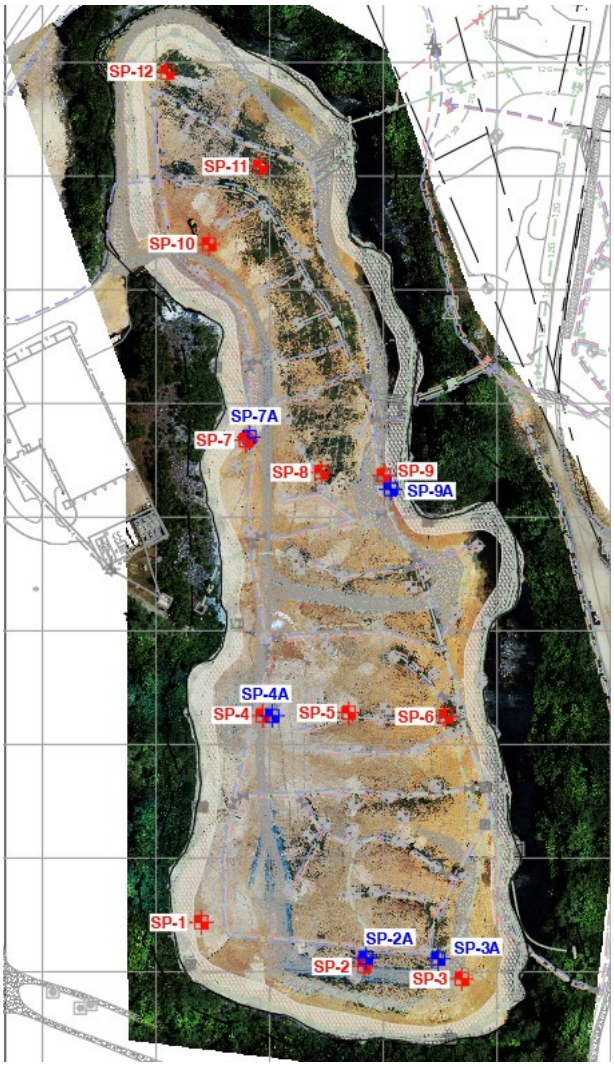
Overall, the analysis of the settlement plate elevation data and surface observations currently indicate ongoing excessive settlement. Criteria one, two, and three are not currently satisfied.

2.0 METHODS

During November 2022, SCS Field Services installed 12 settlement plates on the Solid Waste Permit No. 588 landfill. Five settlement plates were installed during June 2024 to replace settlement plates that had been damaged or were inaccessible. The settlement plates are located throughout the landfill to include varying waste thickness and changes in the landfill's base grade (Figure 1). Monthly surveys of the settlement plates are conducted to monitor changes in elevation. Surveying is

conducted on-foot using satellite-based GPS equipment. The surveyor uses a Trimble R10 as the base and a Trimble R12i as the rover. The base unit is positioned at a control point while the rover is used to locate the settlement plates.

Figure 1 - Settlement Plate Locations



Settlement plates are fixed points installed within the landfill surface that are used to measure changes in elevation and identify the magnitude of on-going settlement. Settlement plates consist of a buried steel base plate and a steel standpipe or rod that extends above ground and provides an elevation reference point. The rod indicates the center of the base plate, and the initial location and elevation is surveyed by a professional surveyor. Subsequent surveys of the settlement plate measure the change in the vertical direction.

2.1 SETTLEMENT PLATE SURVEYS

The locations of the settlement plates were surveyed by the City's surveyor on November 14, 2022. The settlement plates were surveyed again on the following dates: December 13, 2022; January 3, 2023; February 6, 2023; March 8, 2023; April 3, 2023; May 11, 2023; June 5, 2023; July 10, 2023; August 17, 2023; September 11, 2023; October 11, 2023; November 6, 2023; December 12,

2023; January 11, 2024; February 6, 2024; March 13, 2024; April 9, 2024; May 8, 2024; June 4, 2024; July 10, 2024; July 31, 2024; September 10, 2024; October 28, 2024; November 26, 2024; December 23, 2024; January 8, 2025; February 14, 2025; March 18, 2025; April 24, 2025; May 30, 2025; June 27, 2025; July 23, 2025; August 14, 2025; September 9, 2025; October 2, 2025; November 12, 2025, and December 3, 2025.

The surveyed coordinates and elevation changes of the settlement plates are shown in Table 3.

2.2 STATUS OF SETTLEMENT PLATES

Table 2 shows the current condition of each settlement plate. Five of the original settlement plates have been decommissioned due to damage and replaced with new settlement plates in June 2024. Replacement settlement plates (SP-2A, SP-3A, SP-4A, SP-7A, and SP-9A) are listed with suffix "A" in Table 2.

Settlement plates SP-2A, SP-3A, SP-4A, and SP-7A were installed to replace damaged settlement plates. SP-9A was installed due to the existing SP-9's location in a low area which is prone to flooding after rain. The first elevation survey of the replacement settlement plates was conducted July 24, 2024, and the first strain calculations were completed using the next survey's elevation data.

The settlement plate SP-10 is believed to have been disturbed between the readings on 5/30/2025 and 6/27/2025. The disturbance contributed to a measured 0.8-foot drop between the elevation readings. Rather than abandoning the settlement plate, elevation measurements were continued and the subsequent data appears to be reliable. A correction factor has been applied to the calculations and graph for SP-10 to account for the disturbance. The correction factor reduces the measured elevation drop between 5/30/2025 and 6/27/2025 to be consistent with the slope of the best-fit trendline as of the 5/30/2025 reading. Going forward, the correction factor will be applied to calculations and the graph for SP-10.

Table 2 - Settlement Plate Status

Settlement Plate	Condition
SP-1	Operational
SP-2	Decommissioned
SP-2A	Operational
SP-3	Decommissioned
SP-3A	Operational
SP-4	Decommissioned
SP-4A	Operational
SP-5	Operational
SP-6	Operational
SP-7	Decommissioned
SP-7A	Operational
SP-8	Operational
SP-9	Decommissioned
SP-9A	Operational

Settlement Plate	Condition
SP-10[1]	Operational
SP-11	Operational
SP-12	Operational

3.0 SETTLEMENT DATA ANALYSIS

In accordance with the amended Consent Decree, the three criteria introduced in Section 1.0 are used to assess the landfill's suitability for the EVOH deployment:

- **Criterion 1:** The rate of settlement of the waste has transitioned to a state of long-term secondary compression with the settlement varying approximately logarithmically with time.
- **Criterion 2:** Strain rate at all settlement plates is less than 1% per year, or a rate identified as consistent with secondary compression of municipal solid waste. Strain rate is defined here as the ratio of the change in vertical elevation of the surface of the waste at a given location to the thickness of the waste at that location per unit time.
- **Criterion 3:** Surface cracks due to settlement having a width less than 1-inch.

The following sections analyze the settlement plate elevation data for conformance to the three criteria. Criterion 1 is considered by examining the cumulative settlement data, whereas Criteria 2 and 3 are considered using recent settlement data and site inspections. Table 3 provides the most recent position and elevation data (measured in feet) and calculated strain rates for the settlement plates. Non-operational or inaccessible settlement plates have been excluded from some analyses.

Table 3 - Elevation and Strain Data at Settlement Plate Locations

Settlement Plate	Northing (ft)	Easting (ft)	Elevation on December 3, 2025 (ft)	Elevation Change Between September 9, 2025, and December 3, 2025 (ft)	Strain[2] Between September 9, 2025, and December 3, 2025	Calculated Current Rate of Strain/Year[3]	Elevation Change Since Installation (ft)
SP-1	3,397,887.7	10,412,081.2	1,828.4	-0.16	-0.24%	-1.0%	-6.05
SP-2A	3,397,823.6	10,412,370.8	1,791.7	-0.38	-0.25%	-1.1%	-3.97
SP-3A	3,397,820.4	10,412,498.2	1,778.8	-0.06	-0.06%	-0.3%	-1.40
SP-4A	3,398,247.1	10,412,207.9	1,801.7	-0.36	-0.22%	-0.9%	-3.48
SP-5	3,398,255.9	10,412,340.0	1,787.1	-0.53	-0.21%	-0.9%	-13.65

[1] The settlement plate SP-10 is believed to have been disturbed between the readings on 5/30/2025 and 6/27/2025. A correction factor was applied to account for the disturbance, see the discussion in Section 2.2.
[1] Strain is defined as the change in elevation divided by the estimated original waste depth.
[2] Current yearly stain rate is calculated by dividing the strain since the previous suitability assessment survey by the number of days between the assessment surveys and multiplying by 365.

Settlement Plate	Northing (ft)	Easting (ft)	Elevation on December 3, 2025 (ft)	Elevation Change Between September 9, 2025, and December 3, 2025 (ft)	Strain[1] Between September 9, 2025, and December 3, 2025	Calculated Current Rate of Strain/Year[2]	Elevation Change Since Installation (ft)
SP-6	3,398,248.9	10,412,510.1	1,772.6	0.03	0.02%	0.1%	-5.07
SP-7A	3,398,731.4	10,412,158.6	1,821.8	-0.17	-0.13%	-0.6%	-1.68
SP-8	3,398,678.0	10,412,291.1	1,799.2	-0.19	-0.08%	-0.3%	-8.14
SP-9A	3,398,644.3	10,412,416.0	1,788.1	0.17	0.17%	0.7%	-0.73
SP-10[3]	3,399,079.6	10,412,095.4	1,835.8	-0.17	-0.06%	-0.3%	-3.73[3]
SP-11	3,399,216.5	10,412,183.9	1,814.2	-0.05	-0.02%	-0.1%	-2.09
SP-12	3,399,381.7	10,412,019.8	1,809.7	-0.10	-0.09%	-0.4%	-1.00

3.1 CRITERION 1 – TRANSITION TO SECONDARY COMPRESSION

Secondary compression of municipal solid waste is typically characterized by long-term settlement at a decreasing rate due primarily to decomposition. Settlement data for secondary compression follows a logarithmic trend with respect to time.

The previous seven assessments presented the settlement plate data on graphs with linear axes. Linear and logarithmic trendlines were applied to all data for each settlement plate, and the resulting coefficients of determination (R^2) were compared. However, because the analysis duration has increased to over 1100 days, applying the trendlines to the entire data set may obscure more recent changes in the data. The analysis procedure was accordingly revised to better identify more recent transitions from linear to logarithmic data.

The revised analysis presents the settlement plate data on semi-logarithmic graphs where the x-axis uses a logarithmic scale. Logarithmic data will appear to form a line on a semi-logarithmic graph, while linear data will appear to form a curve. The graph for each settlement plate was visually inspected for the appearance of a logarithmic trend. If a logarithmic trend was visible, an approximate start date was chosen. The data following this date was then used to form a best-fit logarithmic trendline. The R^2 of this new logarithmic trendline was compared to the R^2 for the linear trendline generated using the entirety of the settlement data.

The following semi-logarithmic graphs indicate the approximate start day of the visually estimated logarithmic trend. The data points used to calculate the logarithmic trendline are shown in orange. The linear and logarithmic trendline equations and R^2 values are displayed for each graph.

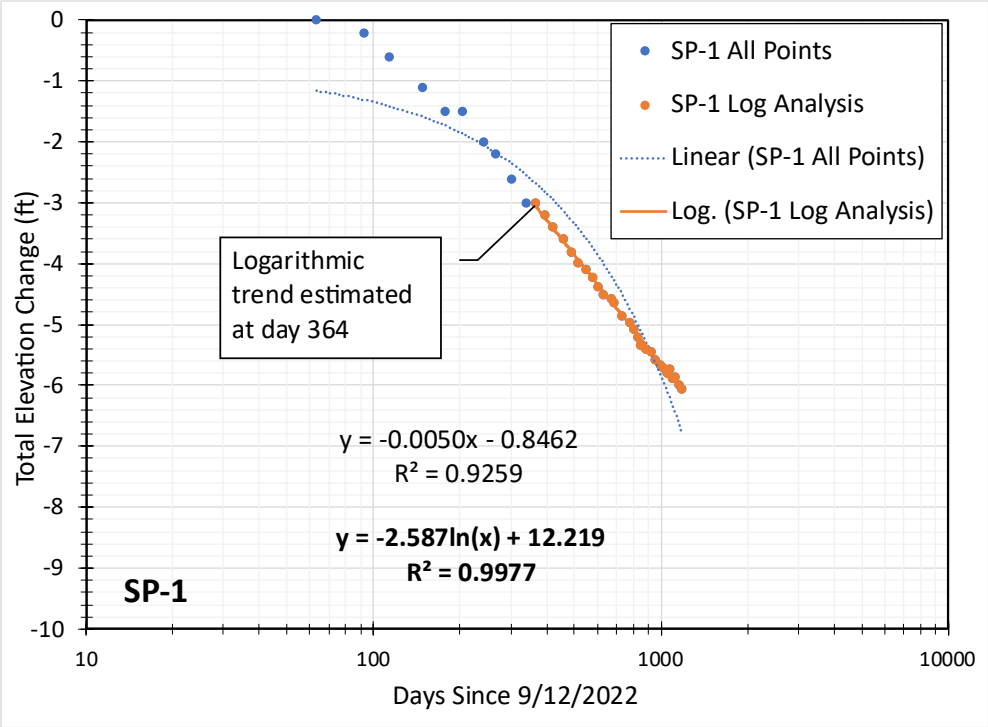
Regression analysis of the complete elevation data for each operational settlement plate currently shows mostly logarithmic trends for the older and replacement settlement plates. Current

[3] The settlement plate SP-10 is believed to have been disturbed between the readings on 5/30/2025 and 6/27/2025. A correction factor was applied to account for the disturbance, see the discussion in Section 2.2.

measurements indicate a logarithmic rate of settlement for SP-1, SP-2A, SP-3A, SP-4A, SP-5, SP-6, SP-7A, SP-8, SP-9A, SP-10, and SP-11. SP-12 is the only remaining plate which best fits a linear trendline, but the overall rate of settlement at SP-12 is low relative to the other plates. The regression analysis results for the settlement plates are presented herein.

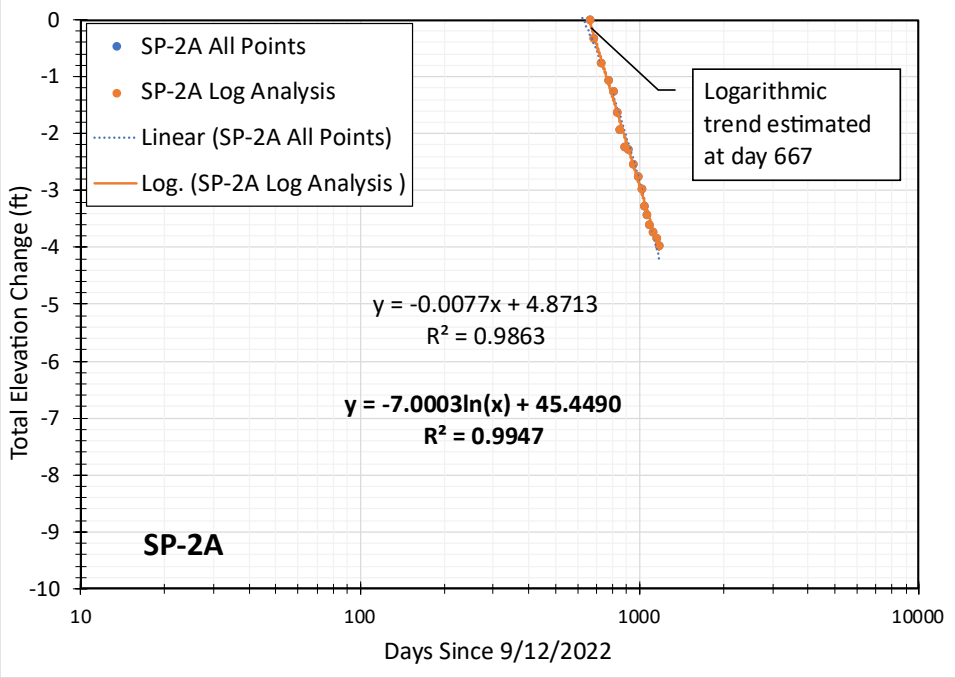
Figure 2 shows the plot of total elevation change versus elapsed time for SP-1. Linear and logarithmic trendlines were fitted to the data, and the coefficients of determination (R^2) were computed. SP-1 shows greater R^2 for the logarithmic trendline, indicating that settlement at SP-1 has transitioned to secondary compression.

Figure 2 - Settlement Plate SP-1



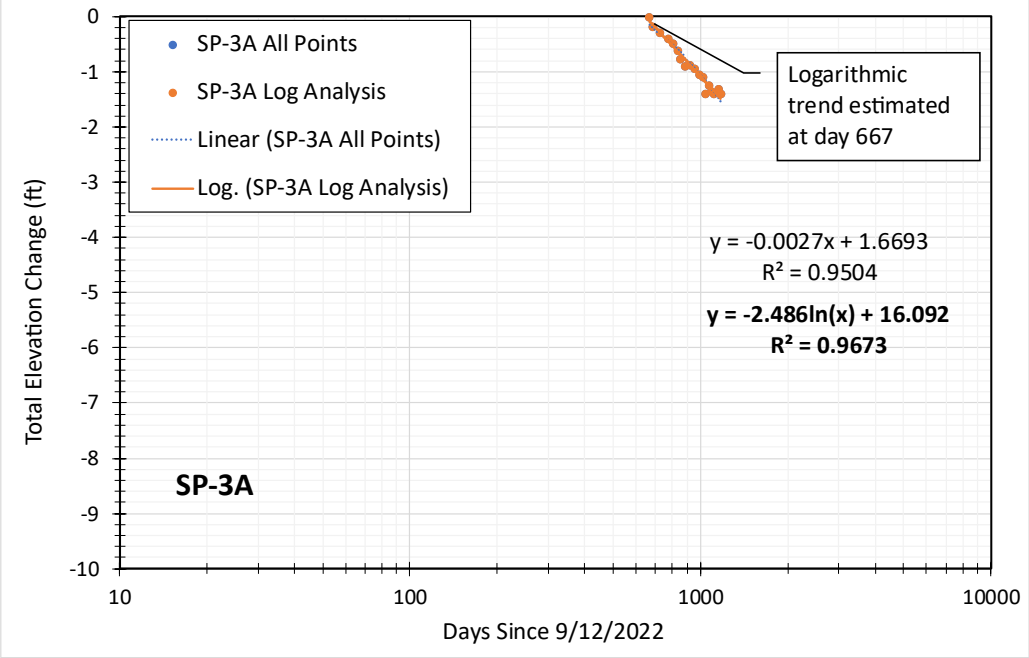
SP-2A replaced SP-2 as of July 2024 and is located near the southern central edge of the landfill. The SP-2A data fits a logarithmic trendline from the day of installation, (R^2=0.9947, see Figure 3).

Figure 3 - Settlement Plate SP-2A



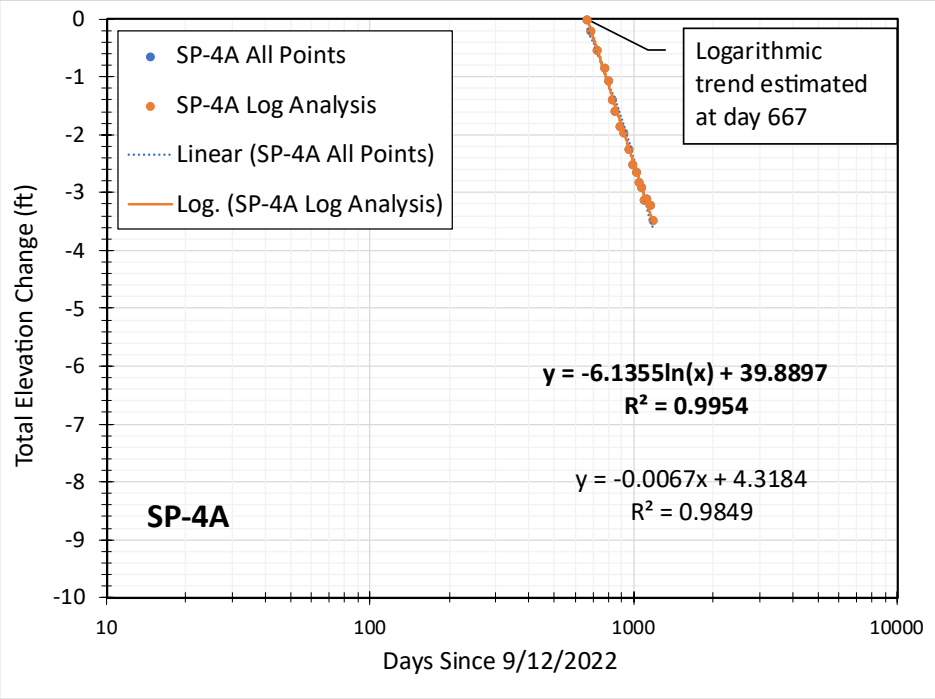
SP-3 was replaced by SP-3A as of July 2024. The elevation data for SP-3A fits data fits a logarithmic trendline from the day of installation, (R2=0.9673, see Figure 4).

Figure 4 - Settlement Plate SP-3A



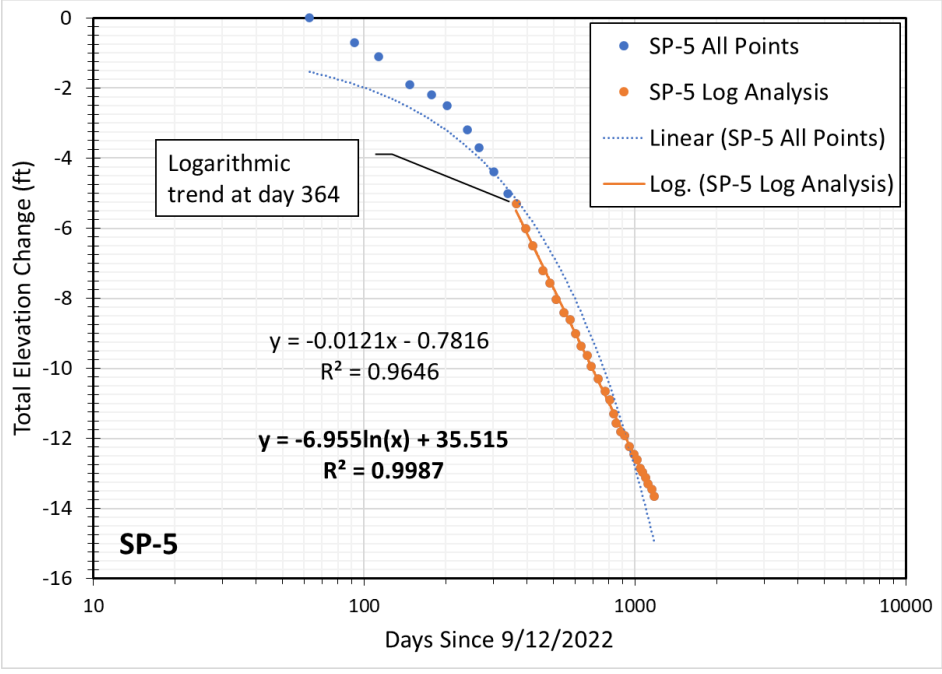
SP-4 was replaced by SP-4A as of the July 31, 2024, survey. The elevation data for SP-4A fits a logarithmic trendline from the day of installation, (R2=0.9954, see Figure 5).

Figure 5 - Settlement Plate SP-4A



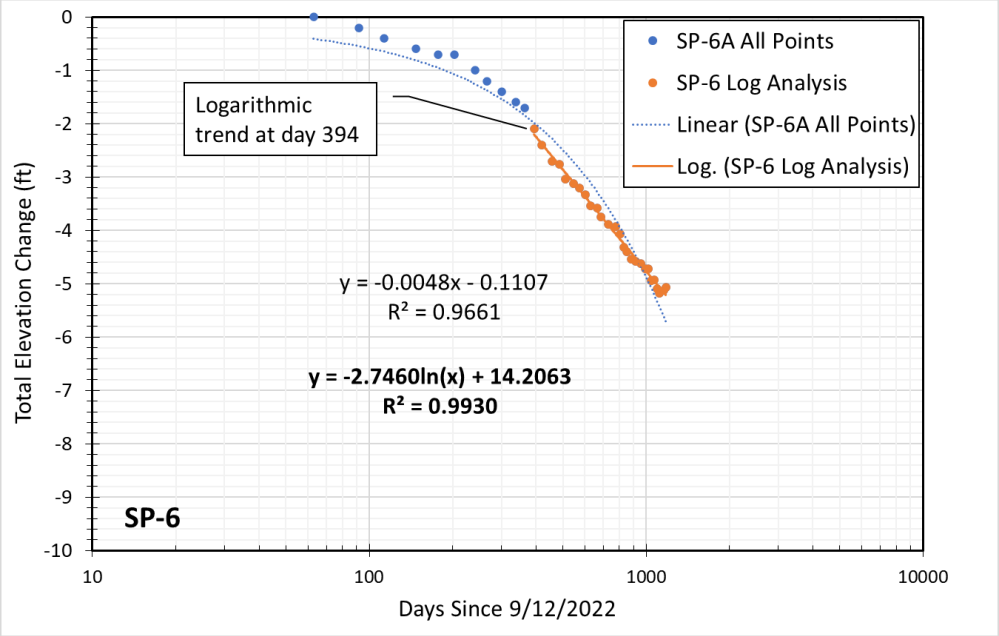
SP-5 shows greater R2 for the logarithmic trendline, indicating that settlement at SP-5 has transitioned to secondary compression (R2=0.9987, see Figure 6).

Figure 6 - Settlement Plate SP-5



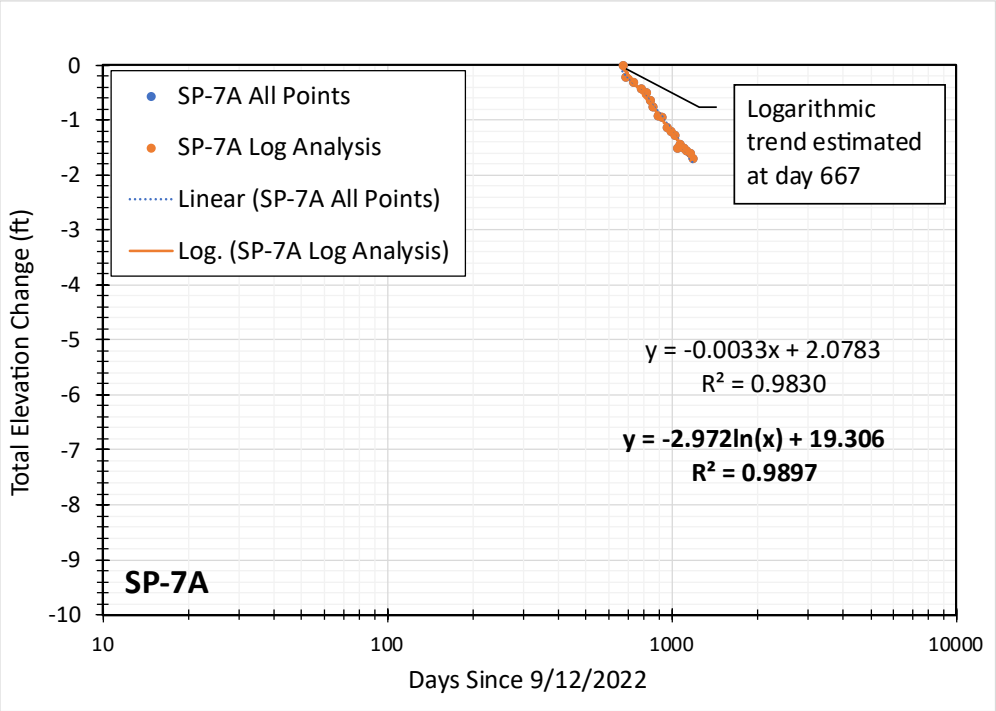
SP-6 shows greater R^2 for the logarithmic trendline, indicating that settlement at SP-6 has transitioned to secondary compression (R2= 0.9930, see Figure 7).

Figure 7 - Settlement Plate SP-6



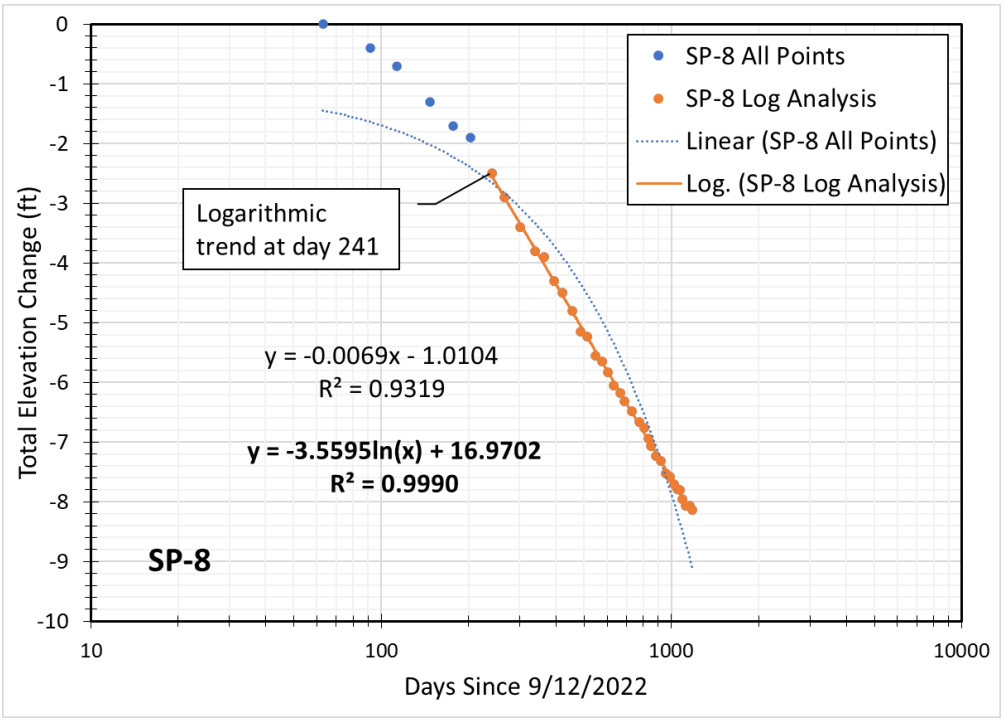
SP-7 was replaced by SP-7A for the July 31, 2024 survey. The elevation data for SP-7A fits a logarithmic trendline from the day of installation (see Figure 8).

Figure 8 - Settlement Plate SP-7A



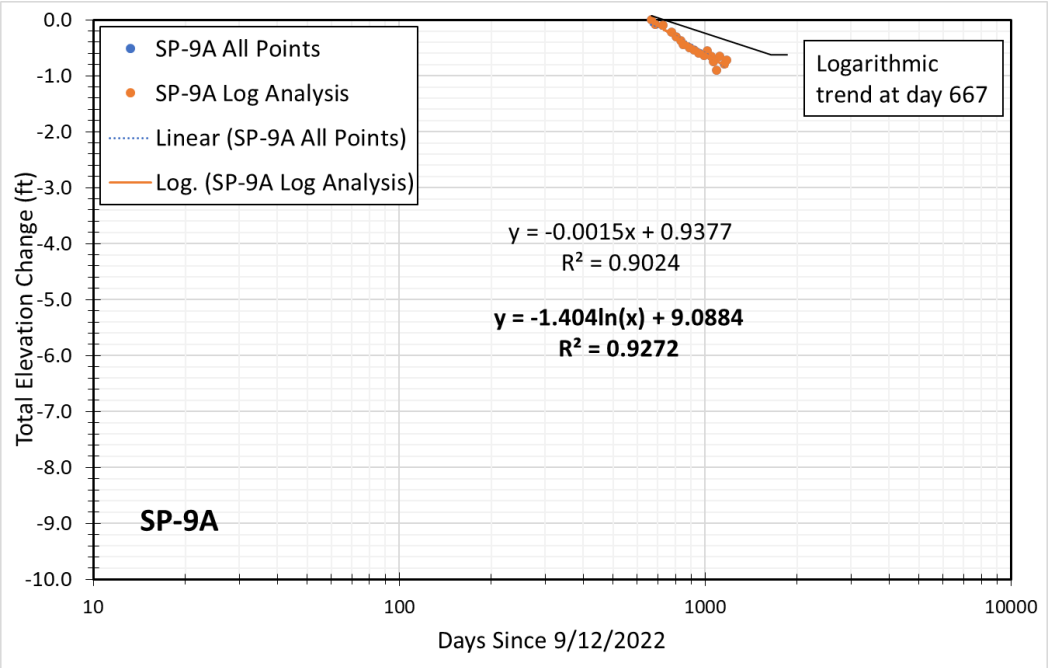
SP-8 is positioned north of the highest temperature area. The settlement data for SP-8 transitioned to a logarithmic trend on day 241 with an R^2 of 0.9990 (Figure 9), indicating secondary compression.

Figure 9 - Settlement Plate SP-8



SP-9 was replaced by SP-9A for the July 31, 2024 survey. SP-9A is located 25 feet southeast of SP-9. The elevation data for SP-9A fits a logarithmic trendline from the day of installation (R2=9272, Figure 10).

Figure 10 - Settlement Plate SP-9A



SP-10, SP-11, and SP-12 are positioned in the north end of the landfill. The northernmost temperature probe (TP-9) indicates lower, more stable temperatures in this area relative to the southern end of the landfill. The elevation data from these settlement plates show lower overall settlement and appear to have lower strain rates (less than 1% per year) relative to the southern plates (Figure 11 through Figure 13). The temperature and elevation data together suggest the northern area may be transitioning to secondary compression, but settlement remains linear with respect to time at SP-12. Elevation variability, potentially due to vertical accuracy limitations of the GPS measurements, appears more noticeable for these settlement plates due to the smaller settlement rates.

Figure 11 - Settlement Plate SP-10

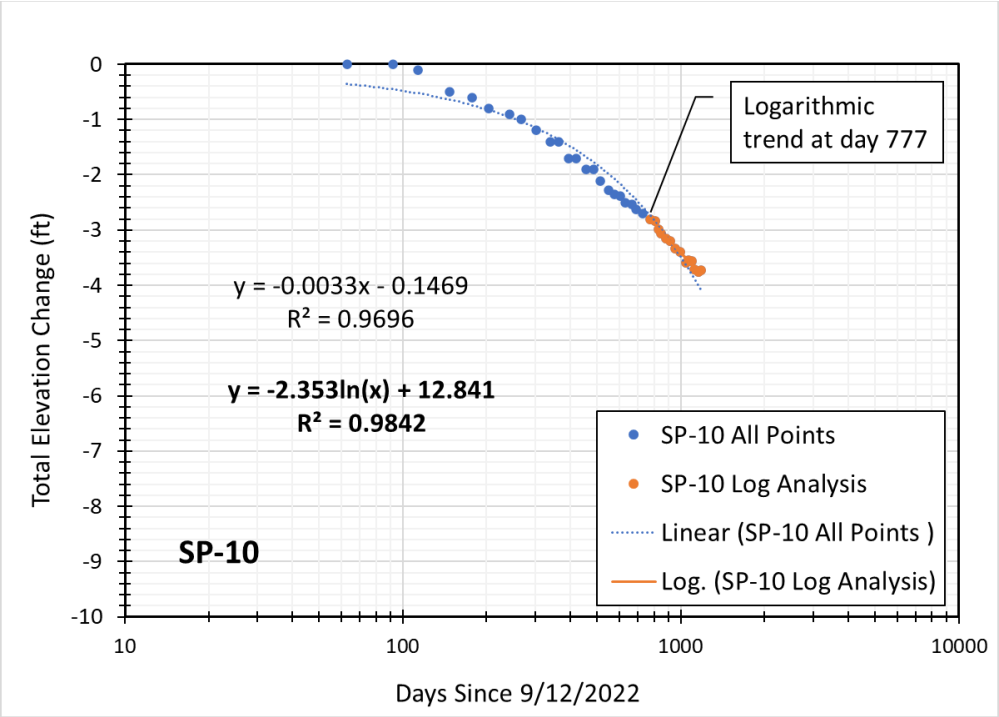


Figure 12 - Settlement Plate SP-11

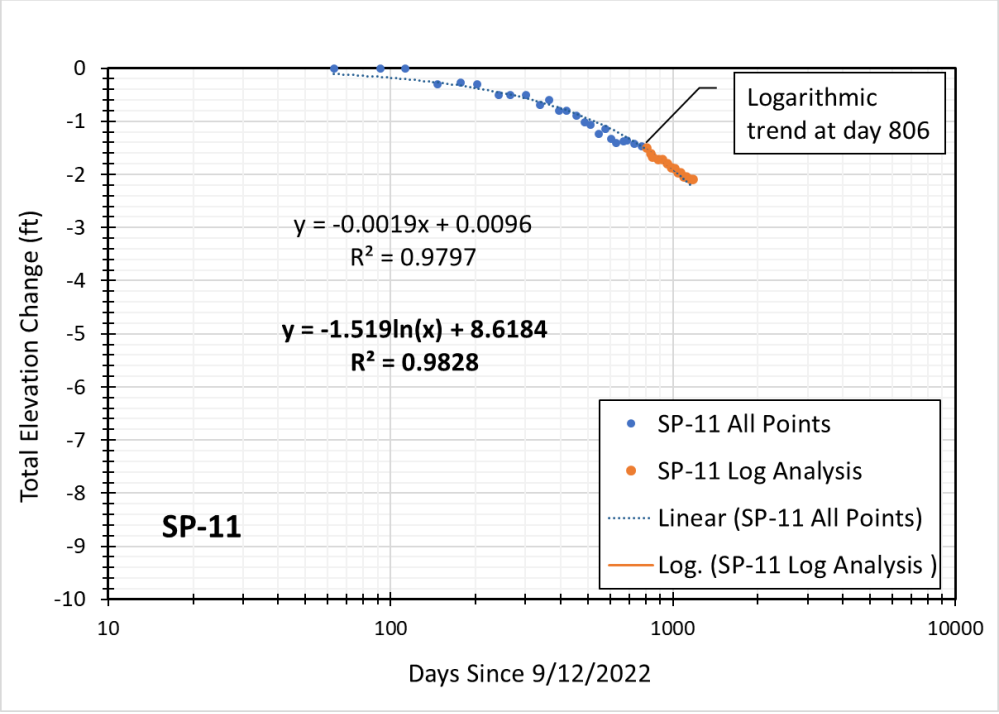
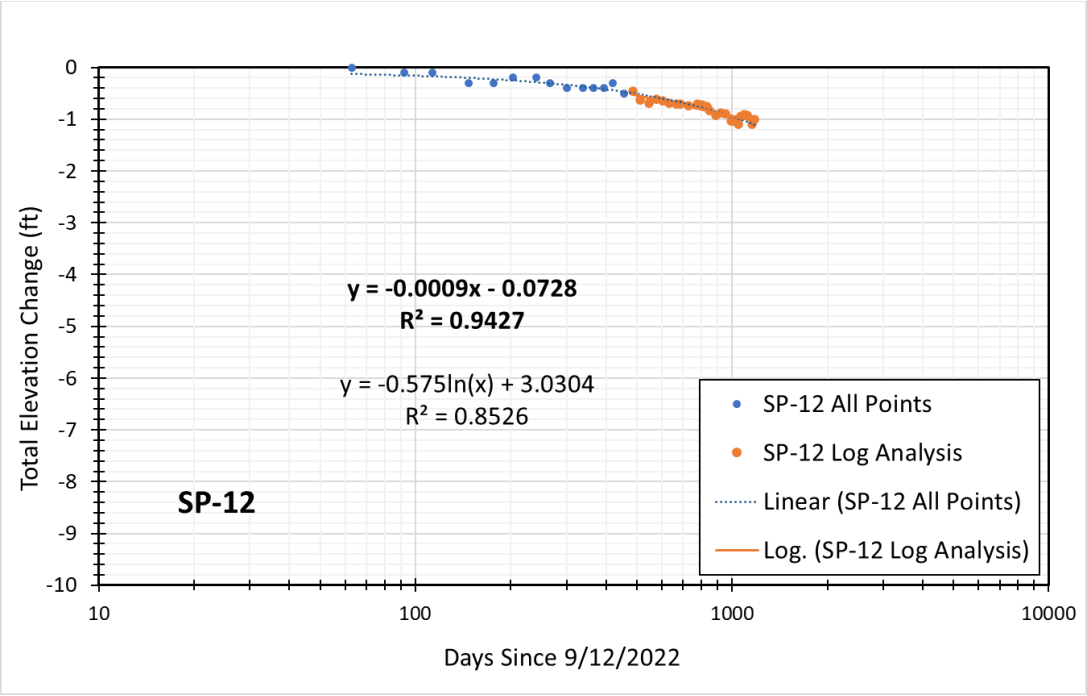


Figure 13 - Settlement Plate SP-12



A summary of the settlement trends is presented in Table 4 for the operational plates. The graphs of the elevation data for SP-1A, SP-2A, SP-3A, SP-4A, SP-5, SP-6, SP-7A, SP-8A, SP-9A, SP-10, and SP-11 demonstrate prevalent logarithmic trends. SP-12 is still displaying a linear regression. While the overall rate of settlement appears to be low, it still has not transitioned to a logarithmic trend. Therefore, criterion 1 is not fully satisfied.

Table 4 - Settlement Trends

Settlement Plate	Apparent Settlement Trend (Linear or Logarithmic)
SP-1	Logarithmic
SP-2A	Logarithmic
SP-3A	Logarithmic
SP-4A	Logarithmic
SP-5	Logarithmic
SP-6	Logarithmic
SP-7A	Logarithmic
SP-8	Logarithmic
SP-9A	Logarithmic
SP-10	Logarithmic
SP-11	Logarithmic
SP-12	Linear

3.2 CRITERION 2 – STRAIN RATE

Table 3 lists *current* yearly strain rates for each settlement plate which were calculated using the change in elevation since the previous suitability assessment (comparing survey data from December 3, 2025 to December 3, 2025) divided by the original waste thickness and the elapsed time measured in years. Two settlement plates show a current yearly strain rate greater than or equal to 1% per year.

As an alternative to the above current yearly strain rate, Table 5 presents the calculated strain rate over the last year by comparing the December 2024 elevation data to December 2025. SP-1, SP-2A, and SP-4A exceeded 1% strain during this time period. These values are compared to the current annual strain rates in Table 3.

Table 5 also includes calculated 1-year settlement projections between December 3, 2025 (the most recent survey date) and December 3, 2026. The calculations used the most recent best-fit trendline for each settlement plate to project the one-year settlement depth (feet) and strain rate (%). The projections are relative to the December 3, 2025 survey measurements.

Table 5 – Comparison of Annual Average Strain Rate and Current Annual Strain Rate

Settlement Plate	Current Annual Strain Rate from Table 3	Average Strain Rate between 12/3/24 and 12/3/25	Projected Settlement between 12/3/2025 and 12/3/2026 (ft)	Projected Annual Strain Rate between 12/3/2025 and 12/3/2026
SP-1	-1.0%	1.28%	-0.7	-1.1%
SP-2A	-1.1%	1.56%	-2.0	-1.3%
SP-3A	-0.3%	0.77%	-0.8	-0.7%
SP-4A	-0.9%	1.25%	-1.7	-1.0%
SP-5	-0.9%	0.92%	-1.9	-0.7%
SP-6	0.1%	0.55%	-0.9	-0.7%
SP-7A	-0.6%	0.78%	-0.8	-0.6%
SP-8	-0.3%	0.49%	-1.0	-0.4%
SP-9A	0.7%	0.34%	-0.5	-0.5%
SP-10[1]	-0.3%	0.52%	-0.7[1]	-0.3%
SP-11	-0.1%	0.20%	-0.4	-0.2%
SP-12	-0.4%	0.22%	-0.5	-0.4%

The measurements indicate that the current strain rates for two of the twelve operational settlement plates meets or exceeds 1% per year. As a result, criterion 2 is not satisfied. The projected one-year settlement rate for three of the twelve settlement plates also meets or exceeds 1%.

[1] The settlement plate SP-10 is believed to have been disturbed between the readings on 5/30/2025 and 6/27/2025. A correction factor was applied to account for the disturbance, see the discussion in Section 2.2

3.3 CRITERION 3 – SURFACE CRACKS

Personnel working at the landfill continue to observe settlement cracks on the landfill surface that exceed 1-inch width. Settlement cracks and surface depressions observed during the current assessment period are shown in the photographs of the landfill surface on the following pages. The locations photographed include the southwest area of the landfill near a bench in the sidewall (Figures 14, 15, and 16). The remaining photographs (Figures 17 and 18) were taken in the northern portion of the landfill, near the access road entrance into the landfill.

Figure 14 – Settlement Crack Observed in Southwest Area Near Sidewall Bench

Figure 15 – Settlement Crack Observed in Southwest Area Near Sidewall Bench

Figure 16 – Settlement Crack Observed in Southwest Area Near Bench in Sidewall

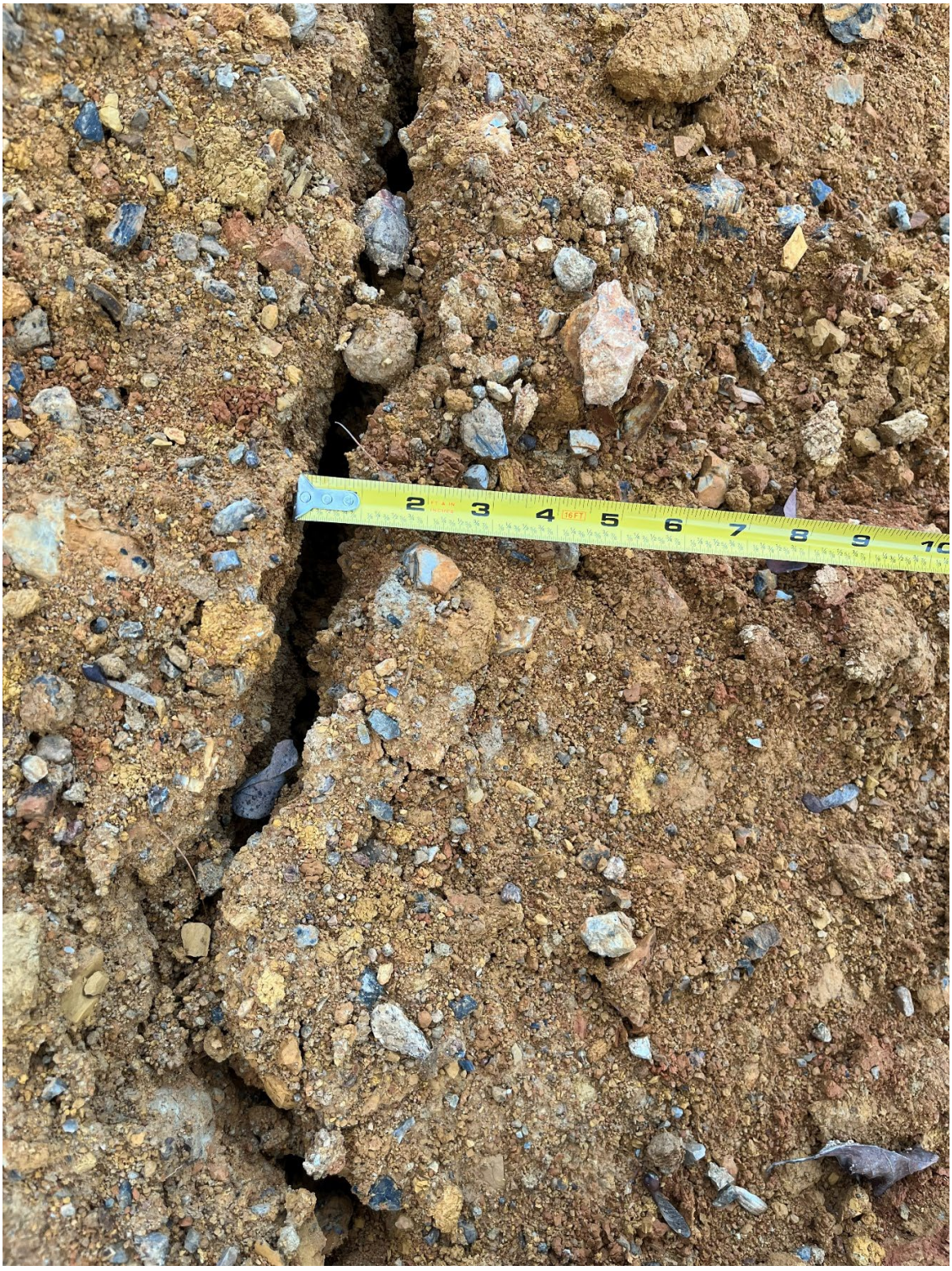


Figure 17 – Settlement Crack Observed in Northern Area Near the Access Road Entrance

Figure 18 – Settlement Crack Observed in Northern Area Near the Access Road Entrance

4.0 CONCLUSION

The analyses of the settlement plate elevation data, strain rates, and presence of surface cracking together indicate that Criteria 1, 2, and 3 remain unsatisfied. The latest settlement trendline projections also suggest that Criterion 2 is unlikely to be satisfied within the next year.

However, the landfill has made progress towards an acceptable settlement condition since the start of the suitability assessments. In the first assessment, one of the eight total settlement plates operational at the time, satisfied Criterion 1 and three plates satisfied Criterion 2. In this current assessment, eleven of the twelve operational settlement plates satisfy Criterion 1 and ten plates satisfy Criterion 2.

SCS understands that if one settlement plate fails to meet Criterion 1 or Criterion 2, then these Criteria have not been fully met. The landfill has not reached an acceptable rate of settlement for the EVOH cover system deployment based on the established criteria. A subsequent assessment will be completed by March 22, 2026 and submitted to VDEQ within 10 business days.