



WASTE MANAGEMENT

1850 Parkway Place
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Marietta, GA 30067

March 29, 2013

Wendy M. Swindell, Senior Project Scientist
Cardno Entrix
1906 12th Court
Vero Beach, Florida 32960 USA

**RE: Waste Management/Wheelabrator Technologies Facility
Grand Cayman, British West Indies**

Dear Ms. Swindell:

I understand that Cardno Entrix is carrying out an environmental impact assessment for the project put forward by Dart Realty (Cayman) Ltd (DRCL) for a new solid waste facility on Grand Cayman and the closure of the existing unlined landfill in George Town.

I understand that as part of your assessment you are tasked with reviewing the "Do-Nothing" alternative at George Town and you are hopeful of obtaining some background knowledge on the feasibility of maintaining and expanding solid waste management activity on the existing property, as this possibility has been raised during public meetings.

You have asked for our qualitative view of DRCL's proposal, and how it may compare with the redevelopment of the George Town property as necessary to implement a waste-to-energy facility at that site.

In early 2012, representatives of Waste Management met with representatives of DRCL, so we are familiar in broad terms with the DRCL proposal to the Cayman Islands Government. In order to summarize our thoughts on the questions you have proposed, I have reviewed the matter with another Waste Management attendee at that meeting.

The meeting was held in Atlanta, Georgia, between the DRCL representatives and those of Waste Management, and we also were representing its affiliate, Wheelabrator Technologies, Inc. At this meeting, DRCL described plans for implementing a new solid waste management facility, described as the Waste Management Facility (WMF). This new facility, to be located on an undeveloped area on Grand Cayman that is well-located on the island, is to include a lined landfill and multiple ancillary facilities including provisions for:

- yard waste composting,
- materials recovery,
- medical waste incineration, and
- citizens convenience center

DRCL is to develop the first phase of the facility on DRCL property on behalf of the government, which is to replace the currently utilized open dump at George Town. DRCL is also to implement closure of the George Town Landfill. The first phase to be implemented by DRCL at the WMF is designed to provide the government with the necessary components to operate a comprehensive waste management facility. The property had been master-planned to allow for the future implementation of waste management technologies including an on-site parcel designated for a waste-to-energy facility.

In contrast to the previously undeveloped WMF site, the George Town site has been used for waste disposal for decades, and the lack of space for additional disposal is among the reasons for considering a differing approach at the George Town site or a different site.

Waste Management/Wheelabrator has not performed a detailed technical review of the proposed closure or new site development. That being said, the preliminary design information provided to us at the meeting relative to the WMF appeared technically sound, offering the island an effective means of managing its solid wastes now and into the future, and it would represent a great improvement in comparison to current practice. Developing a new modern facility on a new site would, in our opinion, represent an attractive and viable technical option.

In contrast, limited available space at the George Town site could potentially be utilized to implement a waste-to-energy facility. However, such facilities generate residue requiring disposal, and not all wastes can be processed through a waste-to-energy facility. Therefore, either the George Town site would need to be expanded or a new site developed to accept the waste-to-energy bypass and residue. This site may be viable in the short term, but the need for future disposal capacity brings into question the long-term viability of this George Town alternative. Waste Management would not recommend mining and subsequently processing previously landfilled waste through a waste-to-energy facility in order to gain future capacity at the George Town site.

We trust that our response is helpful to you. Please contact me at your convenience should you have any questions.

Very truly yours,

WASTE MANAGEMENT



John Van Gessel
Southeast General Counsel

cc: John Workman