Filed: 6/8/2021 10:33:30 AM WEQC

## Shannon Anderson

On behalf of the members of the Powder River Basin Resource Council, thank you for updating the financial assurance requirements for solid and hazardous waste facilities. We appreciate the consistency with the newly enacted land quality financial assurance rules, which made important improvements in several key ways to self-bonding, including reliance on credit ratings, which is a much better way to judge the financial fitness of a company. Nevertheless, we continue to oppose self-bonds for all private sector facilities in Wyoming. Self-bonding is not bonding at all and is too risky for any facility. No amount of safeguards will protect the state and our taxpayers from the cleanup costs when we need it most - when the company has failed. This risk is especially prevalent given the number of bankruptcies in our various industries. We ask the Board to remove the self-bond portions of the rules and require facilities to use the other forms of financial assurance. Thank you. Shannon Anderson, Powder River Basin Resource Council



## Suzanne Engels <suzanne.engels@wyo.gov>

## Solid Waste Rules and Regulations Chapters 1 and 7 comment

1 message

noreply@smartcomment.com <noreply@smartcomment.com>

Thu, Mar 4, 2021 at 4:02 PM

To: sanderson@powderriverbasin.org Bcc: suzanne.engels@wyo.gov

Thank you for your comments on the Solid Waste Rules and Regulations Chapters 1 and 7. Your comments have been received.

Name: Shannon Anderson Address: 934 N. Main St.

City: Sheridan
Province: Wyoming
Postal Code: 82801

Email: sanderson@powderriverbasin.org

## Solid Waste Rules and Regulations Chapters 1 and 7

On behalf of the members of the Powder River Basin Resource Council, thank you for updating the financial assurance requirements for solid and hazardous waste facilities. We appreciate the consistency with the newly enacted land quality financial assurance rules, which made important improvements in several key ways to self-bonding, including reliance on credit ratings, which is a much better way to judge the financial fitness of a company. Nevertheless, we continue to oppose self-bonds for all private sector facilities in Wyoming. Self-bonding is not bonding at all and is too risky for any facility. No amount of safeguards will protect the state and our taxpayers from the cleanup costs when we need it most - when the company has failed. This risk is especially prevalent given the number of bankruptcies in our various industries. We ask the Board to remove the self-bond portions of the rules and require facilities to use the other forms of financial assurance. Thank you. Shannon Anderson, Powder River Basin Resource Council