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GOVERNOR


STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



PHILLIP D. ROOS
DIRECTOR

TO: Landfill Owners/Operators

FROM: Katriena Hurley, Solid Waste Section, Materials Management Division

DATE: June 25, 2024 

SUBJECT: Financial Assurance Inflation Adjustment for July 1, 2024, through June 30, 2025, for Type II Landfills licensed after March 29, 2023

This memo provides information related to the inflation factor for adjusting closure/post-closure financial assurance costs for your Type II solid waste landfill license after March 29, 2023.

Please note facilities that are actively taking waste, will need to submit updated financial assurance on an annual basis based on the anniversary date of your most recent operating license.

Closure/post-closure cost inflation factor of 1.335 for existing and new Type II landfills.

- Landfill owners/operators for existing¹ Type II landfills and new Type II landfill will use the inflation factor of **1.335** to calculate the annual adjustment to closure and post-closure costs for the period July 1, 2024, through June 30, 2025.
- Landfill owners/operators will utilize Form B² - Closure Cost Estimate for adjusting closure costs to account for inflation. On Form B, line 22, insert the new inflation index of **542**; on line 23, insert the base year inflation index of 406; and on line 24, insert the inflation factor of **1.335**.
- Landfill owners/operators will utilize Form C² – Post-closure Cost Estimate for adjusting post-closure costs to account for inflation. On Form C, line 32, insert the new inflation index of **542**; line 33, insert the base year inflation index of 406; and on line 34, insert the inflation factor of **1.335**.
- Landfill owners/operators who are in the process of applying for a new Type II solid waste disposal area operating license or renewing a solid waste disposal area operating license for a Type II landfill that will be issued during the July 1, 2024, through June 30, 2025, period will need to submit financial assurance based on the aforementioned inflation factor before the license is issued.

This memo does not address the inflation adjustment for corrective action costs. Landfill owner/operators will utilize form D² – Corrective Action Cost Estimate for adjusting corrective action costs. Corrective action costs are based on third-party cost

¹ Receiving waste after October 9, 1993.

² Forms B, C, and D are available by accessing [Solid Waste Disposal Areas](#) and selecting Closure/Post-Closure Financial Assurance Forms (New Calculations).

estimates, and the inflation factor is calculated using the base year inflation index of the original corrective cost estimate and the current inflation index.

A Type II landfill owner/operator has the option to use third-party closure and post-closure cost estimates per Section 11523a(3) of Part 115, Solid Waste Management, of the Natural Resources and Protection Act, 1994 PA 451, as amended, rather than the Forms B and C for calculating their closure and post closure costs. If EGLE approves these costs, an annual inflation adjustment factor using the most recent Bureau of Reclamation Composite Index for construction trends is applied.

New and updated financial assurance mechanisms shall be submitted to:

Michigan Department of Environment, Great Lakes, and Energy
Materials Management Division
Solid Waste Section

U.S. Mail

P.O. Box 30241
Lansing, Michigan 48909-7741

Overnight Courier

Attn: Katriena Hurley, Fourth Floor South
525 West Allegan Street
Lansing, Michigan 48933

Updated financial assurance cost estimates shall be submitted to:

E-mail

EGLE-Solid-Waste-Forms@Michigan.gov

Should you require further information, please contact your Materials Management Division (MMD) District Office representative, or you may contact me at 517-388-0293 or HurleyK1@Michigan.gov.

cc: Phil Roycraft, EGLE
Rhonda Oyer, EGLE
MMD District Supervisors, EGLE