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Georgia-Pacific Gypsum, LLC Class IIIb Landfill Permit Application Sevier County, Utah

Prepared for

Georgia-Pacific
P O Box 570080
Sigurd, UT 84657
Contact David Jolley
435 201 2341

Prepared by

JBR Environmental Consultants, Inc 8160 S Highland Drive, Sandy, Utah 84093 Contact David Brown 801 943 4144 January 28, 2010





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INTRODUCTION

With this modified *Checklist for Class IIIb Landfill*, Georgia-Pacific Gypsum LLC (G-P) is submitting the enclosed application for the landfill permit for the proposed landfill to be sited at their gypsum processing facility located near Sigurd, Utah

GENERAL INFORMATION FOR ALL FACILITIES

General description of the facility (R315-310-3(1)(b))

G-P owns a gypsum product manufacturing facility located at 200 South State Street m Sigurd, Utah The facility manufactures wallboard and plaster products Over the past 15-years (approximately), the facility has been accumulating reject plaster and wallboard products in piles located approximately 75 yards east of the manufacturing building These piles are currently being managed in accordance with the facility's Recycling Plan of Operations (RPO), which was approved by the Utah Division of Solid and Hazardous Waste (DSHW) in October 2006 The RPO provides a means of recycling and/or disposing of a discrete quantity of the piles every year such that the combined pile volumes will decrease annually and eventually be limited to a small quantity capable of being recycled on an annual basis

As of May 2008, the G-P Sigurd facility was idled and ceased production at that time As a result, the facility is no longer capable of recycling the pile material. For this reason, G-P is submitting this application to landfill the piles on or near their current location. Figures for the existing and final proposed design are included in Appendix B. Figure 1 is a topographic survey of the existing site topography and waste piles. Figure 2 shows the existing cross sections as indicated on Figure 1. Figure 3 shows the final facility topography and Figure 4 shows the final proposed cross sections.

The contents of the proposed landfill will consist only of the existing pile material, which contain either wallboard or plaster products. No other debris, such as hazardous waste or other unacceptable waste, has been placed on the piles. The G-P facility is secured with a four-strand barbed-wire fence surrounding the property. Entrance to the facility is gained through a locked or guarded gate. The operators will be trained to know and understand that no additional waste materials are to be deposited in the landfill. Onsite waste handling consists of the waste being moved between landfill areas by forklift, truck, or front loader

Legal description of the facility (R315-310-3(1)(c)) The legal description of the proposed onsite landfill is

Section 1, Township 23 South, Range 2 West, Salt Lake Meridian Latitude 38 841°N, Longitude 111 967°W, UTM Zone 12, 416,083 Easting, 429,932 Northing

Land use in the surrounding area consists of mining and minor agriculture and grazing Aside from the nearby town of Sigurd, most of the surrounding area is in its undisturbed, natural state

Types of waste and area served by the facility (R315-310-3(1)(d))

The landfill will contain only nonhazardous waste generated from the G-P Sigurd plant. The waste consists of gypsum wallboard and plaster. Small amounts of other materials (construction and demolition debris) may also present. No other wastes are accepted, therefore, this landfill is not a commercial landfill and no other areas are served. The daily volume will be maximized to landfill the stockpiled gypsum material in the shortest amount of time possible.

Intended schedule of construction (R315-302-2(2)(a))

The Sigurd landfill is anticipated to commence construction within two weeks of permit approval Construction will carry on approximately 180 days

GENERAL INFORMATION FOR NEW CLASS III LANDFILLS

Documentation that the facility has met the historical survey requirement of R315-302-1(2)(f) (R315-305-4(1)(b) or R315-305-4(2)(a)(iv)

A historical survey was completed by Bighorn Archaeological Consultants, LLC on September 15, 2008 and submitted to the DSHW on August 7, 2009

Any cultural or historical sites identified in the area of the landfill will be isolated by a caution tape and/or silt fence barrier periodically monitored by an archaeologist as described in Section 3 1 5 of the Closure and Postclosure Plan

Name and address of all property owners with 1000 ft of the facility boundary (R315-310-3(2)(1))

See Appendix A for a list of all property owners within 1000 feet of the landfill

Documentation that a notice of intent to apply for a permit has been sent to all property owners listed above (R315-310-3(2)(11))

See Appendix A for copies of certified mail receipts for delivery of Notice of Intent

Name of the local government with jurisdiction over the facility site (R315-310-3(2)(111))

Sevier County
Board of County Commissioners
250 N Main St
Richfield, Utah 84701
(435) 893-0401

LOCATION STANDARDS FOR NEW CLASS 111b LANDFILLS

Floodplains as specified in R315-302-1(2)(c)(ii) (R315-304-4(2)(a)(i))

According to the FEMA-issued flood insurance maps, no floodplains are located on the site The nearest floodplain is the Sevier River, located approximately 600 feet north of the property

Wetlands as specified in R35-302-1(2)(d) (R315-304-4(2)(a)(ii)) Naturally-occurring wetlands are not present on the project site

The landfill is located so that the lowest level of waste is at least ten feet above the historical high level of ground water (R315-304-4(2)(a)(111))

Topographical maps show the elevation of the nearby Sevier River to be below elevation 5220 feet (Appendix B) The lowest elevation of the landfilled material is planned to be 5230 feet elevation

<u>PLAN OF OPERATIONS (R315-310-3(1)(e))</u>

Description of onsite waste handling procedures (R315-302-2(2)(b), R315-310-3(1)(f))

Onsite waste handling consists of a front loader moving the existing waste wallboard material for purposes of sloping, smoothing, or covering the storage piles. There are no records of weight or volume of waste that have been deposited. Volume estimates have been generated using survey data

Schedule for conducting inspections and monitoring (R315-302-2(2)(c), R315-302-2(5)(a), and R315-310-3(1)(g))

Weekly inspections of the landfill will be conducted during active operations

Contingency plans in the event of a fire or explosion (R315-302-2-(2)(d))

The waste is not flammable or combustible and consists of materials mined from the surrounding soil, therefore, a fire or explosion in the landfill area is highly unlikely However, the area is served by the local fire department, and equipment is located on-site to move soil for fire suppression

Contingency plans for other releases, e.g. explosive gases or failure of run-off collection system (R315-302-2(2)(f))

Per R315-304-5(1)(a), this is not applicable to Class III landfills

A plan to control fugitive dust generated from roads, construction, general operation and covering the waste (R315-302-2(2)(g)

Fugitive dust during construction will be controlled by water spray and other measures as outlined in the Fugitive Dust Control Plan attached as Appendix C

Plan for litter control and collection (R315-302-2(2)(h))

G-P's Class IIlb Landfill will not be accepting office waste materials and will, thus, not be required to develop a litter control plan for light-weight wind-blown materials

Procedures for excluding the receipt of Regulated hazardous or PCB containing waste (R315-302-2(2)(J))

Any hazardous waste found at the site will be handled in accordance with all federal, state, and local laws and transported for disposal offsite to approved, permitted facilities Employees are trained to identify and classify waste according to its hazard class No PCB containing wastes are on the site and none will be placed in the landfill

Procedures for controlling disease vectors (R315-302-2(2)(k))

The waste materials in the landfill are not attractive to disease vectors or support vector habitats, therefore, no special method to control them is necessary. However, the designed cover is sufficient to control any disease vectors

A plan for alternative waste handling (R315-302-2(2)(l)) This section is not applicable

A general training and safety plan for site operations (R315-302-2-(2)(0))
Please refer to Appendix D for G-P's general site safety plan for the Sigurd facility

Any recycling programs at the facility (R315-303-4(6)) No recycling programs are currently in effect at the facility

Current topographical map (R315-310-4(2)(a)) Refer to Appendix B for the current topographical map

Most recent U S Geological Survey topographic map Refer to Appendix B for the most recent U S Geological Survey map

ENGINEERING REPORT – PLANS, SPECIFICATIONS, AND CALCULATIONS

Cell design, cover design, fill methods, elevation of final cover including plans and drawings (R315-310-3(1)(b))

The landfill will be created using the area method of filling or by using a combination of trench/area methods. The landfill is best described as a series of storage piles created by grading the waste material into position on level ground. In some cases, trenching and backfilling may be necessary to limit additional top soil requirements. Cover design will be in accordance with R315-305-5(4) and will consist of covering any timbers, wood, and other combustible waste with a minimum of six inches of soil or equivalent, as needed to avoid a fire hazard. Closure will be in accordance with R315-305-5, which states that the facility will be leveled to the extent practicable, the waste will be covered with a minimum of 24 inches

of soil, including six inches of topsoil, the cover will be contoured to a grade of surface slopes not less that 2% and the grade of side slopes be not more than 33%, and, seeding will be with grass or other shallow rooted vegetation or other native vegetation. See Appendix E for seed mix and application rates

Design and location of run-on and run-off control systems (R315-310-5(2)(b))
Berms and other graded structures will be used to prevent storm water runoff from impacting the landfill The final contours of the closed landfill are shown in Appendix B

CLOSURE PLAN (R315-310-3(1)(h) and R315-310-5(2)(c))

G-P will notify the Sevier County Recorder to file proof of closure as outlined in R315-302-2(6) within 30 days after certification of closure The complete closure plan is included below in this document

POST-CLOSURE CARE PLAN (R315-310-3(1)(h))

G-P will provide post closure activities that will include, at a minimum, monitoring of land and water, for a period of 30 years, or as long as the Executive Secretary determines is necessary for the facility or unit to become stabilized and to protect human health and environment. The complete post-closure care plan is included below in this document.

FINANCIAL ASSURANCE (R315-310-3(1)(J))

Identification of post-closure costs including cost calculations (R315-310-4(2)(e)(iv))

Post-closure costs for the landfill are located in Appendix F The costs for post-closure of the landfill section estimated at \$65,843 This includes reseeding, site inspections, groundwater monitoring and all other requirements

Identification of the financial assurance mechanism that meets the requirement of Rule 315-309 and the date the mechanism will become effective (R315-309-1(1)) A copy of the Financial Assurance mechanism is provided in Appendix G

Georgia-Pacific Gypsum, LLC Closure and Post-Closure Plan Sevier County, Utah

Prepared for

Georgia-Pacific
P O Box 570080
Sigurd, UT 84657
Contact David Jolley
435 201 2341

Prepared by

JBR Environmental Consultants, Inc 8160 S Highland Drive, Sandy, Utah 84093 Contact David Brown 801 943 4144 January 28, 2010





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10 Introduction

Georgia Pacific Gypsum LLC (G-P) is submitting the enclosed Closure and Postclosure Plan in accordance with the State of Utah, Division of Solid and Hazardous Waste's (DSHW) R315-304-5 rules with this document

11 Site Description and Background

G-P owns a gypsum product manufacturing facility located at 200 South State Street in Sigurd, Utah The facility manufactures wallboard and plaster products Over the past 15-years (approximately), the facility has been accumulating reject plaster and wallboard products m piles located approximately 75 yards east of the manufacturing building These piles are currently being managed in accordance with the facility's Recycling Plan of Operations (RPO), which was approved by the Utah Division of Solid and Hazardous Waste in October 2006 The RPO provides a means of recycling and/or disposing of a discrete quantity of the piles every year such that the combined pile volumes will decrease annually and eventually be limited to a small quantity capable of being recycled on an annual basis

As of May 2008, the G-P Sigurd facility was idled and ceased production at that time As a result, the facility is no longer capable of recycling the pile material. For this reason, G-P is submitting this application to landfill the piles on or near their current location. See Appendix B for a diagram of the facility and pile locations.

The contents of the proposed landfill will consist only of the existing pile material, which contain either wallboard or plaster products. No other debris, such as hazardous waste or other unacceptable waste, has been placed on the piles. The G-P facility is secured with a four-strand barbed-wire fence surrounding the property. Entrance to the facility is gained through a locked or guarded gate. The operators will be trained to know and understand that no additional waste materials are to be deposited in the landfill. Onsite waste handling consists of the waste being moved between landfill areas by forklift, truck, or front loader

The legal description of the existing onsite landfill is

Section 1, Township 23 South, Range 2 West, Salt Lake Meridian Latitude 38 841°N, Longitude 111 967°W, UTM Zone 12, 416,083 Easting, 429,932 Northing

Figures for the existing and final proposed design are included in Appendix B Figure 1 is a topographic survey of the existing site topography and waste piles Figure 2 shows the existing cross sections as indicated on Figure 1 Figure 3 shows the final facility topography and Figure 4 shows the final proposed cross sections

20 Statement of Closure Plan

G-P is required to submit Closure and Postclosure Plans in a way that "minimizes the need for further maintenance and minimized the postclosure formation and releases of leachate and explosive gases to the air, groundwater or surface water to the extent necessary to protect the public health and welfare and prevent any nuisance" This document represents G-P's comphance with R315-302-3 (2)

30 Closure Plan

3 1 Methods, Procedures, and Processes

All materials disposed of within the existing Class Illb landfill has been and will continue to be within the acceptable waste constituents of an industrial nonhazardous landfill. The landfill contains only nonhazardous waste that was generated from the Sigurd facility. The waste consists of gypsum wallboard and plaster materials. Small amounts of other materials (construction and demolition debris) may also present. No other wastes are accepted

This landfill is not a commercial landfill and no other areas are served. The estimated amount of material included in the landfill is presented in Section 3.3

3 1 1 Maintenance and Control

Access to the facility is restricted through fencing and gating Signs will be posted indicating authorized personnel only are allowed on the access roads leading into the plant Wind dispersal of landfill litter will be minimized by the application of cover

At the end of landfill construction, the landfill will be closed with an application of the intermediate cover and a complete inspection of the surface. Cleanup of the site will be performed concurrently. Any remaining visible litter and debris in the immediate vicinity will be placed in the final lift of the landfill unit. At that time, the final cover will be applied. A thorough closure inspection shall consist of observations for erosion, sloping, drainage, surface leachate, and run-on. Areas requiring repairs/modifications will be documented on the Landfill Inspection Form (see Appendix H). Necessary modifications will be made using appropriate materials and compacted, as required

3 1 1 1 Escape of Air Pollutants/Gases

The contents of this industrial waste landfill have little or no amounts of putrescible materials and the decomposition of the organic wastes are minimal. The U.S. EPA reports that methane is generated from "municipal" solid waste only when the moisture content exceeds 40% (U.S. EPA, 1994). Due to the limited moisture at the site and the absence of putrescible wastes contained in the heap, methane gas generation is not anticipated. Vector, dust, and odors are effectively controlled so they are not a nuisance or hazard to health, safety or property. None of the waste is flammable, but combustible waste may exist,

however, a fire or explosion in the landfill area is highly unlikely. The area is served by the local fire department, and equipment is located on the site to move soil for fire suppression, if necessary

3112 Control of Run-off

Runoff from the landfill is not expected to occur during the construction and closure of the landfill After closure, the absorption and evapotranspiration by the vegetation layer and the absence of any appreciable run-on will ensure the control of runoff Once the vegetation layer growth is established, most storm events will not result in significant direct runoff from the landfill surface area Nonetheless, significant percolation through the cover layer is unlikely, thus leachate or seepage from the landfill will be minimal

3 1 2 Final Facility Topography

Refer to Figures 3 and 4 in Appendix B

3 1 3 Composition of Cover

The final cover system will consist of an 18-inch compacted soil layer and 6-inch topsoil layer. The material used for final cover will be placed on the graded, compacted gypsum material. The compacted soil layer material will be composed of native soils from the site and/or nearby sources. This layer of compacted soil and will serve to minimize infiltration. A topsoil layer of no less than 6 inches will then be applied. The topsoil layer will be of an organic composition that will support native or compatible plant life. The final cover depth will be no less than 24 inches.

3 1 3 1 Sloping

The final cap will be contoured such that the grade is greater than 2 percent and less than 33 percent and will be vegetated with native vegetation or a suitable alternative approved by the Executive Secretary for other similar operations. Any deviation from this plan will be submitted in advance to the Executive Secretary and the Division of Solid and Hazardous Waste for consideration and approval. See Figure 3 for the final facility topography and Figure 4 for cross sections showing the final slopes and grades.

3 1 3 2 Landscaping

The waste will be leveled to the extent practicable, covered with a minimum of two feet of soil and the cover contoured as described above. No vegetation, other than local introduced and native grasses and woody species identified in Section 3 1 3 3 and Appendix E will be placed on the landfill

3133 Vegetation

See Appendix E

3 1 4 Description of Monitoring and Mamtenance

Qualified personnel will be located near or around the landfill to supervise continued activities during closure. The closure of the landfill will be concurrent with the landfill's final development. Landfill operations will proceed in a manner that will minimize the working area of the landfill to the extent possible. Once the final cover is placed and graded, landfill inspections will commence. The Postclosure Landfill Inspection Form (see Appendix F) will be used for the final closure inspection.

315 Protection of Cultural Resources

Any cultural or historical sites identified in the area of the landfill will be isolated by a caution tape and/or silt fence barrier. A qualified archaeologist will coordinate with the construction manager to place the barrier in appropriate locations to prevent damage by construction equipment or any other potentially harmful activities. The archaeologist will periodically monitor the barrier and resources to ensure their continued protection. Long-term protection will be provided by the facility perimeter fencing and locked gates. The only traffic at the facility will be associated with the requisite periodic inspections of the landfill.

316 Contact Personnel

The following positions and personnel represent G-P's contact list of responsible officials as they pertain to the G-P Gypsum Sigurd Landfill operation, closure, and postclosure issues

Landfill Owner
Operator
Address

Georgia-Pacific Gypsum LLC Georgia-Pacific Gypsum LLC

P O Box 570080 Sigurd, Utah 84657 Owner Contact Person

Thomas C Brooks

Phone

(702) 643-8100 X 304

Alternate Phone

(702) 845-9714

Operator Contact Person David W Jolley Phone (435) 201-2341 Alternate Phone (435) 633-0332

3 2 Maximum Portion of Operation

The landfill will be created using the area method of filling or by using a combination of trench/area methods. The landfill is best described as a series of storage piles created by grading the waste material into position on level ground. In some cases, trenching and backfilling may be necessary to limit additional top soil requirements. Cover design will be in accordance with R315-304-5 and will consist of covering any timbers, wood, and other combustible waste with a minimum of six inches of soil or equivalent, as needed to avoid a fire hazard. Closure will be in accordance with R315-304-5, which states that the facility will be leveled to the extent practicable, the waste will be covered with a minimum of two feet of soil, including six inches of topsoil, the cover will be contoured to a grade of surface slopes not less that 2% and the grade of side slopes be more than 33%, and, seeding will be with grass or other shallow rooted vegetation or other native vegetation. See Appendix E for seed mix and application rates.

3 3 Maximum Inventory and Estimated Life

Based on the final closure design, original topography, and volume of the final cover, the approximate maximum inventory for the landfill cells is as shown in the following table

Landfill Cell Volumes in Cubic Yards

Area	Maxımum	Cover	Total Volume	Existing Waste	Remaining
	Waste	Volume	Including Cover	Volume	Waste
	Volume			(stockpiled)	Volume
Cell 1	124,766	6,631	131,397	124,766	NA
Cell 2	3,790	557	4,347	3,790	NA
Cell 3	23,456	1,597	25,053	23,456	NA
Cell 4	32,466	2,493	34,959	32,466	NA
Total	184,478	11,278	195,756	184,478	NA

Estimates of the estimated life of the landfill are irrelevant as closure of the landfill will directly follow the construction and placement materials in the landfill, during a period of less than one year

34 Schedule for Completion

G-P estimates completion of the landfill within 180 days of either receipt of the landfill permit or authorization from the DSHW G-P will notify the DSHW upon completion of closure to schedule the final inspection by regulatory agencies

3 5 Notification and Review

Within 60 days of certification of closure of the landfill, G-P will make the proper notification and submittals to the Sevier County recorder and, upon doing so, file proof of title filing with the Executive Secretary With respect to the requirement at R315-302-2(6)(b) for public access to records containing information about solid waste amounts, location, and periods of operation, G-P files annual reports to the Division of Solid and Hazardous Waste, as required These documents are public records and may be obtained by local zoning authorities from either the Division or G-P, upon request

3 6 Closure Activity Notification

G-P will begin closure activities of the landfill in accordance with the approved Closure Plan Closure activities shall be completed within 180 days from their starting time, however, G-P reserves the right for extensions of the deadline for beginning and concluding closure activity. The Executive Secretary will be given written justification for any extension requests. If necessary, fences will be erected to limit service and signs will be posted at conspicuous locations indicating closure activities have begun. Alternative disposal site locations will be indicated on the closure notice signs.

40 Postclosure Plan

After the Closure Plan has been executed, completed, and certified, the following postclosure and end use plan will be implemented Following closure of the landfill, G-P will conduct the appropriate industrial landfill postclosure care

4.1 Maintenance of Final Cover

Facility maintenance and monitoring of applicable gases, land, and water constituents will be conducted for a period of 30 years after closure, or as long as the Executive Secretary determines is necessary for the facility or unit to become stabilized and to protect human health and environment. The landfill cover and surrounding areas will be inspected and repaired by G-P or a G-P confractor on a quarterly basis for the first three years, then semi-annually for 27 years thereafter. The Postclosure Inspection Form is shown in Appendix F.

411 Repairs

During landfill inspections, if any settlements, subsidence or erosion areas are found on the cover, they will be promptly backfilled with onsite compatible (similar permeability) soil. After final grading, the area will be revegetated with the prescribed native seed mix. If there are areas of inherent erosion, it will be documented on the Landfill Inspection.

Form and addressed by regrading and placement of appropriate cover material. To prevent integrity breaks in the cover due to mechanical agitation, notices will be posted and access will be limited to inspection, maintenance, and monitoring personnel. Repairs will be made promptly with the appropriate soil, rip rap, or other necessary materials that will be compatible to the immediate environmental factors that cause breeches in the cover integrity.

412 Prevention of Run-On and Run-Off

In the event of failure of the run-off collection system devised for the landfill, contracted heavy equipment will be used to reconstruct and/or repair any berms or diversion structures as necessary Low permeability material and/or liners can be used if necessary

413 Maintenance & Operation of Leachate Collection System

This section is not applicable to this Class IIIb landfill

414 Monitoring of Surface & Groundwater

This section is not appheable to this Class IIIb landfill

415 Monitoring of Gases

This section is not applicable to this Class Illb landfill

4 2 Postclosure Care Statement

G-P will conduct postclosure monitoring and maintenance care as necessary or as directed by the Executive Secretary for a period of 30 years from date of closure, or as long as the Executive Secretary determines is necessary for the facility or unit to become stabilized and to protect human health and environment Reduction or extension of the 30 year monitoring and maintenance care period may be negotiated between the Executive Secretary and G-P management

4 3 Postclosure Use Statement

No public post closure use is anticipated Use of the area will be restricted to personnel performing landfill inspections and maintenance of the cover. This non-public post closure use will not increase the foreseeable threat to public health in the general vicinity of the landfill.

4.4 Postclosure Certification

G-P will submit written verification following the closure of a landfill unit and following the completion of postclosure care of a landfill unit. This verification will state the completed activities are in accordance with the requirements of R315-302-3(7)(b)

50 Submittal Statement

The Closure Plan (Section 3, Page 9), Postclosure Plan (Section 4, Page 13), and other necessary documents are included in this permit application

No subsequent modification to the Closure and postclosure Plan will be made without the approval of Executive Secretary G-P reserves the right to petition to amend the Postclosure Plan

G-P will keep a copy of the most recent approved Closure Plan and Postclosure Plan at the Sigurd facility

Appendix A

List of Property Owners within 1,000 feet of the Landfill and Proof of Mailing for Notice of Intent

Property Owners within 1,000 feet of the Landfill

Name	Address
Alma Borg	Sigurd, UT (General Delivery)
James Allen	Sigurd, UT (General Delivery)
Gordon Bellow	Sigurd, UT (General Delivery)
Henry N eilson	Sigurd, UT (General Delivery)
Hartley Brown	Sigurd, UT (General Delivery)
Tim Anderson	1940 N Canal Rd Venice UT 84701
Brian Synder	Sigurd, UT (General Delivery)
Robert Evans	Sigurd, UT (General Delivery)
Elmer Chestnut	Sigurd, UT (General Delivery)
United States Gypsum	Sigurd, UT (General Delivery)
Steve Colby	Sigurd, UT (General Delivery)
Peggy Jensen Newby	Sigurd, UT (General Delivery)
Randall Stewart	Sigurd, UT (General Delivery)

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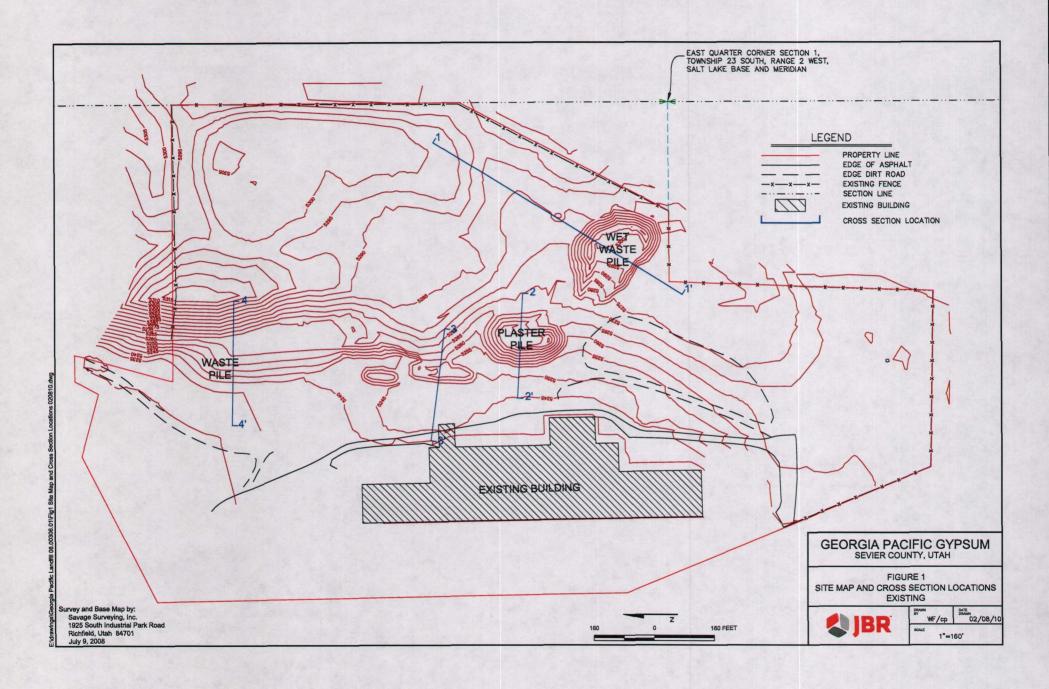
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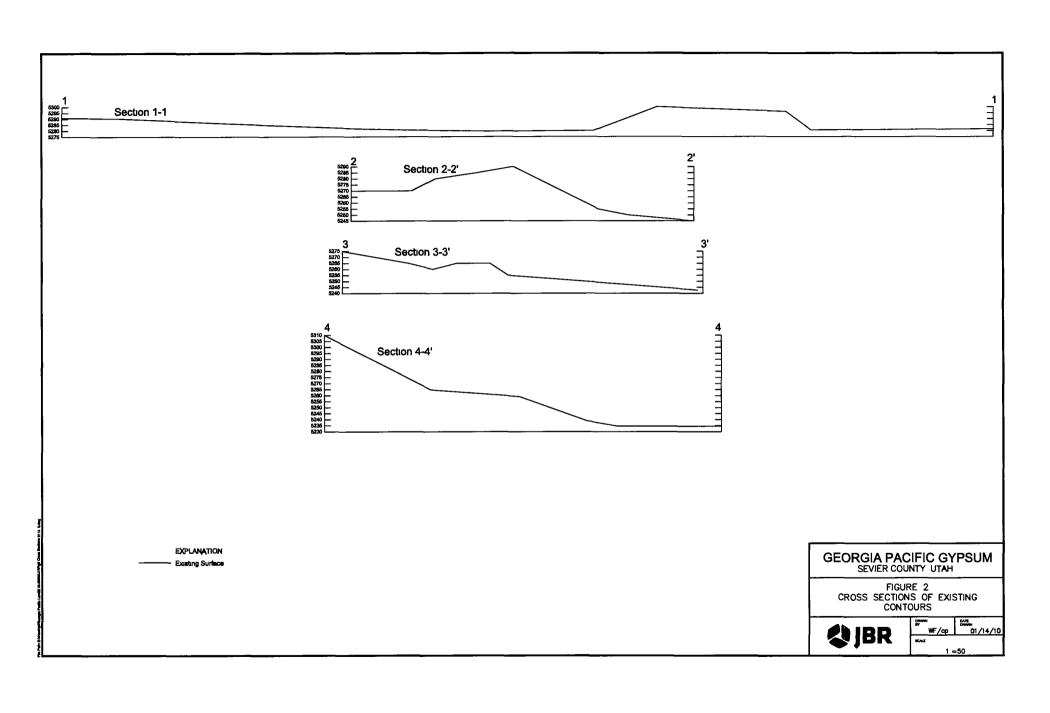
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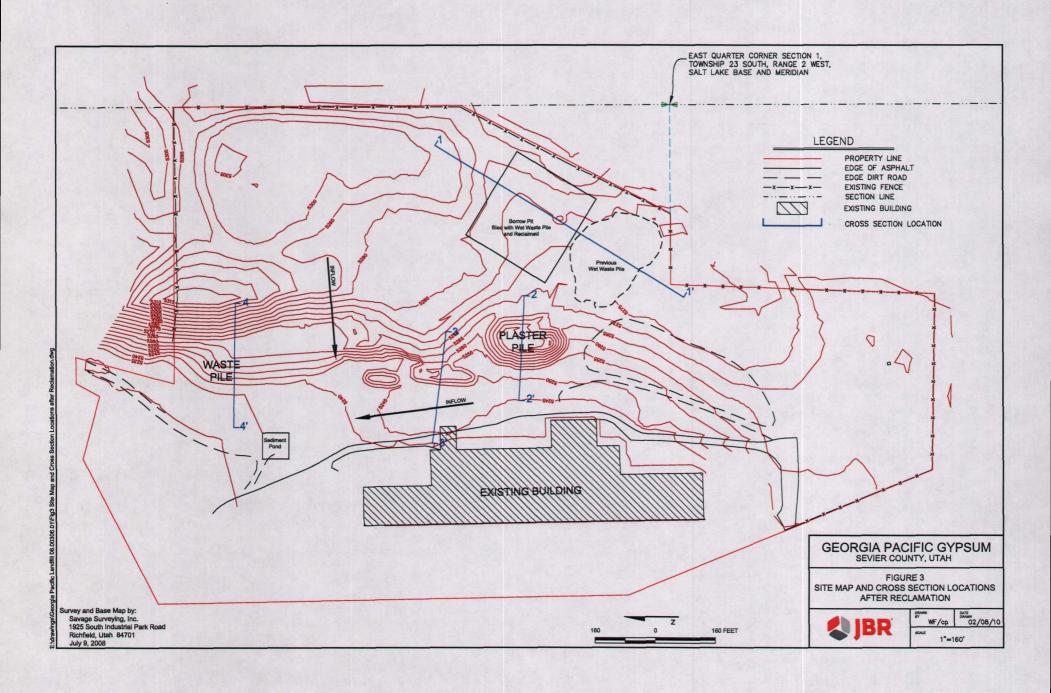
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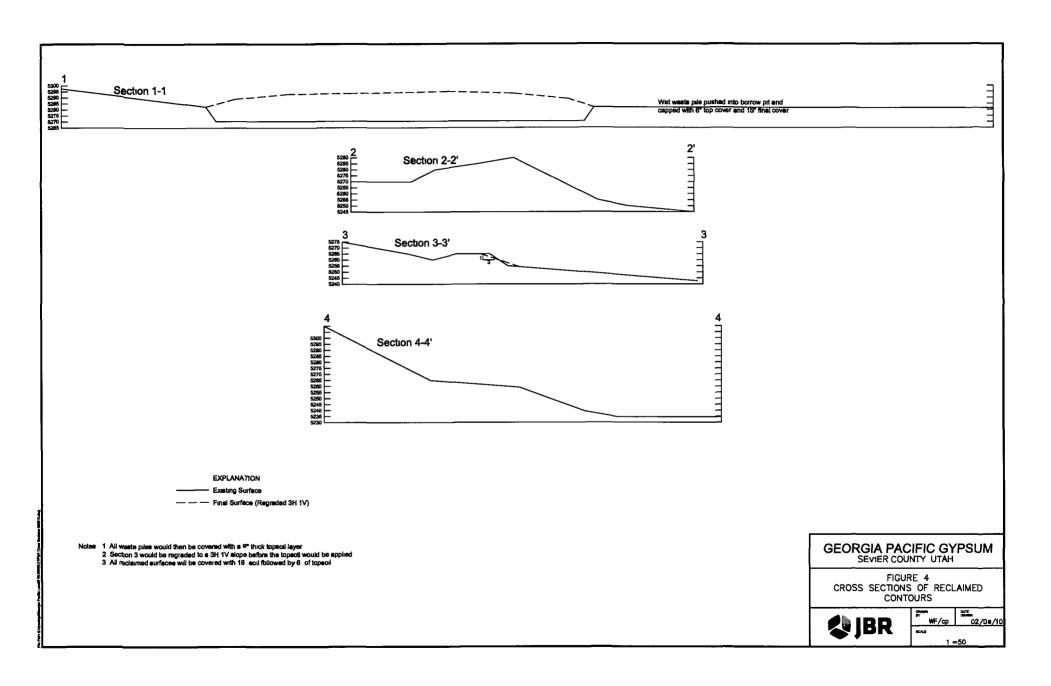
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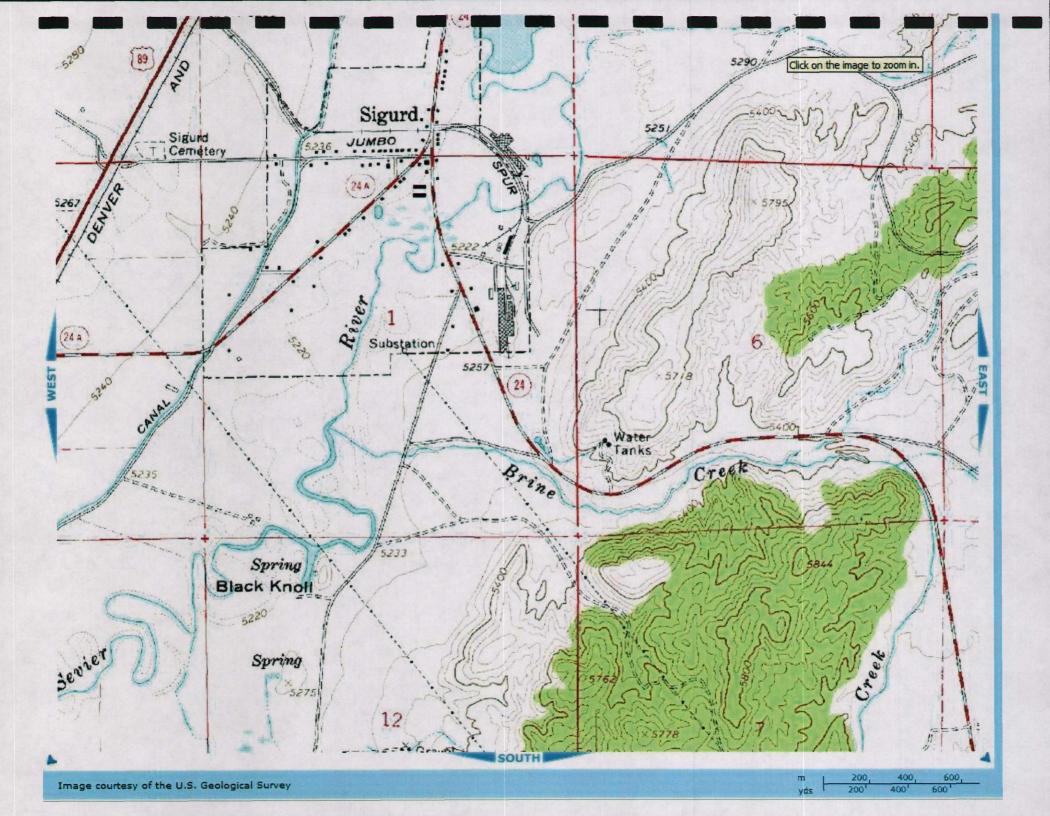
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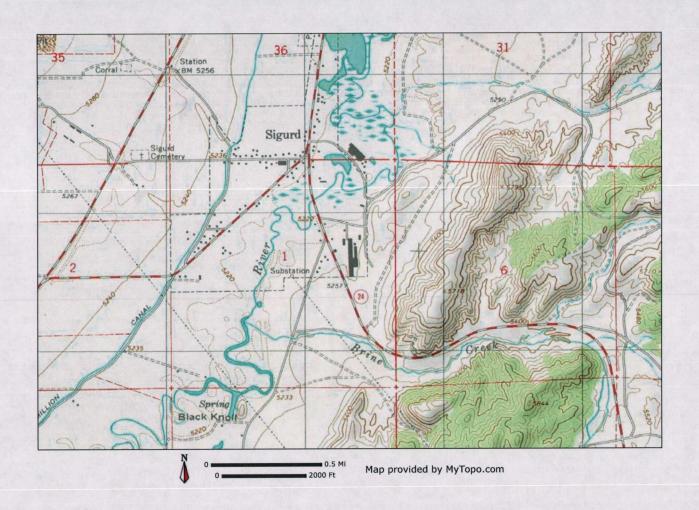












Appendix C

Fugitive Dust Control Plan

Fugitive Dust Control Plan Document

The intent of the Fugitive Dust Control Plan (FDCP) Document is to provide formal procedures used to minimize fugitive dust from the Georgia-Pacific (G-P) Gypsum Sigurd facility. The plan has been written to provide a site specific plan for the activities creating fugitive dust, and thus the actions for controlling fugitive dust. This document has been prepared to offer flexibility yet maintain compliance with the Utah Administrative Code (UAC) Section R315-302-2(2)(g), and the requirements of the Class IIIb Landfill Application submitted to the Utah Department of Solid and Hazardous Waste. The primary purpose of this approach is to ensure an FDCP is in place for all projects, including those that are short-term, while only requiring minimal administrative effort.

Directions to complete the Fugitive Dust Control Plan Document

- 1 Make a hard copy of the plan
- 2 On the copied plan, fill in all blanks, as described in the plan
- Provide a means of requiring contractors to follow the FDCP (e.g., contracts, signage, etc.)
- 4 Retain copy on-site to use and to follow

G-P GYPSUM

Fugitive Dust Control Plan

For the

Sigurd, Utah Facihty

200 South State Street

For questions regarding this plan contact

Dave Jolley

at

435-201-2341

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I.	Introduc	etion	X			
II.	Regulat	ory Applicability	X			
III.	Source	Information	X			
IV.	Fugitive	Dust Emission Activities	X			
V.	Fugitive Dust Controls i. Road Activity Fugitive Dust Control					
		Activity Specific On-Site Fugitive Dust Control Off-Site Fugitive Dust Control				
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Attac	chment 2	Fugitive Dust Management, Acknowledgement and	Certification			



http://www.airquality.utah.gov/PERMITS/dust/index.htm

I. Introduction

G-P Gypsum is a company involved in the gypsum wallboard manufacturing industry. Typical operations include gypsum material storage, crushing, conveying, hauling, and loading of gypsum materials. The intent of this Fugitive Dust Control Plan (FDCP) is to maintain compliance with ease of site specific requirements for a FDCP and to provide written procedures for mitigating dust from fugitive-dust related activities. This document has been prepared to offer flexibility yet maintain comphance with the Utah Administrative Code (UAC) Section R315-302-2(2)(g), and the requirements of the Class Illb Landfill Application submitted to the Utah Department of Solid and Hazardous Waste. The primary purpose of this approach is to ensure an FDCP is in place for all projects, including those that are short-term, while only requiring minimal administrative effort.

II. Regulatory Applicability

The UAC R307-309, Nonattainment and Maintenance Areas for PM10 Fugitive Emissions and Fugitive Dust, purpose is to establish minimum work practices and emission standards for sources of fugitive emissions and fugitive dust located in PM10 nonattainment and maintenance areas to reach reasonably available control measures for PM10 required by the Clean Air Act (UAC R307-309-1)

Currently, the Sigurd Utah facility, located in Sevier County, is in an attainment area, thus the requirements of R307-309 do not apply. However, this document has been prepared as a best management practice to comply with the fugitive dust control requirements of UAC R315-302-2(2)(g), and also to comply with the facility's Class Illb Landfill Application

COMPLETE THE TABLE

Check "YES" if the activity will occur, or potentially occur anytime during the project
Check "NO" if the activity will never occur during the project
If any portion of the table is blank, the FDCP will not be considered compliant

YES	NO	ACTIVITY
✓		Storage, hauling or handling operations of material
✓		Clearing or leveling of land one-quarter acre or greater in size
\checkmark		Earthmoving, excavation, or movement of trucks or construction equipment over cleared land one-quarter acre size or greater
✓		Haul road access and activity
	✓	Engaging in demolition activities including razing homes, buildings or other structures

III. Source Information

The section supplies the site specific information regarding the project. Although not required by the UAC, the Utah Division of Air Quality (UDAQ) suggests the FDCP to contain the following source specific information. Therefore, the information provided in this section is not to be used for determining compliance with any applicable permits, rather to give an overall understanding of the project for fugitive dust applications only.

COMPLETE THE TABLE

Complete all Sections of the Table

If a section of the table is not applicable to this project, indicate such with "N/A"

SOURCE INFORMATION				
Name of Operation:	G-P Gypsum, Sigurd Facility, Class IIIb On-Site Landfill			
Address or Approximate Location:	200 South State Street Sigurd, UT			
Approximate Length of Project:	Landfill Closure estimated at 6-months			
Description of Process or Activity:	Move and level existing gypsum piles (wallboard, plaster, rock) and cover with overburden/topsoil			
Type of Material Processed or Disturbed:	Gypsum, overburden			
Amount of Material Processed or Disturbed:	Net combined pile volumes estimated at 185,000 yd3			

In all cases, the responsible parties for fugitive dust control are the owner and/or operator.

Attachment 1 identifies the owner and operators of this project, and the contact information of the individuals responsible for implementation and maintenance of the FDCP. In addition, all subcontractors who are active on the project have entered into an agreement of shared responsibility regarding fugitive dust control. Attachment 2 identifies the subcontractors and the duration of subcontractor activity on the project.

IV. Fugitive Dust Emission Activities

This section addresses the specific project activities generating fligitive dust

COMPLETE THE TABLE

Check "YES" if the activity will occur, or potentially occur anytime during the project
Check "NO" if the activity will never occur during the project
In "ACTIVITY DETAILS" provide additional information to explain the activity

ACTIVITY	YES	NO	ACTIVITY DETAILS
MATERIAL STORAGE		√	List the type of material, how many storage piles and area used for storage piles
MATERIAL HANDLING, TRANSFER, HAULING LOADING, OR DUMPING	<		List the type of material that will be handled, transferred, loaded, hauled and/or dumped and the equipment that will be used for these activities Soil will be transported from one area of the site to a landfill cap that will be constructed using dozers and scrapers
HAUL ROADS, ROADWAYS, OR YARD AREAS	✓		List vehicles, equipment, and frequency of driving on the haul roads, roadways, or yard areas List approximate lengths of road or areas these items will take up A maximum of 1,000 yards of haul road is anticpated to be used by scrapers at the frequency of up to 12 trips per hour
CLEARING, LEVELING,	✓		List the acreage of land being cleared or leveled Approximately 6 acres will be disturbed

(TABLE CONTINUED ON NEXT PAGE)

Check "YES" if the activity will occur, or potentially occur anytime during the project
Check "NO" if the activity will never occur during the project
In "ACTIVITY DETAILS" provide additional information to explain the activity

ACTIVITY	YES	NO	ACTIVITY DETAILS
EARTH MOVING, EXCAVATION	√		List the areas of earthmoving, excavation or trenching
			Approximately 2 acres of area will be disturbed to mine soil for a landfill cap
CONSTRUCTION, DEMOLITION		√	List the structures that will be demolished or constructed and the areas associated with those activities
DRILLING, BLASTING, PUSHING OPERATIONS		√	List frequency of drilling blasting and pushing operations, (hours per day, days per week, weeks per year)
MATERIAL PROCESSING**		√	Will any material be made or altered during the project? For example, crushing, screening, concrete production? Explain any material processing activities that will take place
OTHER		✓	Are there any other sources that could create dust that were not already addressed? If so, list and explain

^{**}Material processing may require an approval order or other air permit. If applicable, the appropriate permits are in Attachment 3

V. Fugitive Dust Controls

There are various aspects of fugitive dust control that must be addressed

- Road Activity Fugitive Dust Control
- Activity Specific On-Site Fugitive Dust Control
- Off-Site Fugitive Dust Control

Road Activity - Fugitive Dust Control

The following are requirements, specific to road use that must be implemented during all projects, as indicated by the UAC. The UAC specifically identify activities that require prompt mitigation for control of fugitive dust. Due to the nature of G-P Gypsum business, these activities will always apply to a project, therefore, these techniques will be implemented for duration plant activity

UAC R307-309-7 Storage, Hauling, and Handling of Aggregate Materials Any person owning, operating or maintaining a new or existing material storage, handling, or hauling operation shall prevent, to the maximum extent possible, material from being deposited onto any paved road other than a designated deposit site. Any such person who deposits materials that may create fugitive dust on a public or private paved road shall clean the road promptly

UAC R307-309-7 Construction and Demolition Activities

Any person engaging in clearing or leveling of land with an area of one-quarter acre or more, earthmoving, excavating, construction, demolition, or moving trucks or construction equipment over cleared land or access haul roads, shall prevent, to the maximum extent possible, material from being deposited onto any paved road other than a designated deposit site. Any such person who deposits materials that may create fugitive dust on a public or private paved road shall clean the road promptly

UAC R307-309-9 Roads

- (1) Any person responsible for construction or maintenance of any existing road or having right-of-way easement or possessing the right to use the same whose activities results in fugitive dust from the road shall minimize fugitive dust to the maximum extent possible. Any such person who deposits material that may create fugitive dust on a public or private paved road shall clean the road promptly
- (2) Unpaved Roads Any person responsible for construction or maintenance of any new or existing paved road shall prevent, to the maximum extent possible, the deposit of material from the impaved road onto any intersecting paved road during construction or maintenance. Any person who deposits material that may create fugitive dust on a public or private paved road shall clean the road promptly

Activity Specific On-Site Fugitive Dust Control

For each activity that was described in *IV Fugitive* Dust *Emissi*on *Activities*, a control strategy or strategies are listed. The strategies are listed in a staged approach, meaning that if the first approach of control, Stage 1, is not satisfactory, then the next approach of control, Stage 2 will be attempted. Stage 3 is the final stage. If Stage 3 is imsuccessful in mitigating flightive dust, this plan requires ceasing operation to control fugitive dust.

It is the owner/operator's responsibility to ensure that each these control strategies are implemented and maintained on-site and that all subcontractors are aware of their obligation regarding these control strategies. Additional space has intentionally been included to allow the site supervisor to include any additional control strategies at each stage.

ACTIVITY	CONTROL STRATEGY		
MATERIAL STORAGE	Stage 1	Inherent moisture with water sprays only on an asneeded basis	
	Stage 2	Increase use of water sprays until fugitive dust is controlled	
	Stage 3	Minimize or reduce operations	
MATERIAL HANDLING, TRANSFER, HAULING LOADING, OR DUMPING	Stage 1	Inherent moisture with water sprays only on an as- needed basis	
	Stage 2	Increase use of water sprays until fugitive dust is controlled	
	Stage 3	Minimize or reduce operations	
HAUL ROADS, ROADWAYS, OR YARD AREAS	Stage 1	Water sprays only on as-needed basis	
	Stage 2	Increase use of water sprays imtil fugitive dust is controlled	
	Stage 3	Mınımıze or reduce travel on these areas	

(TABLE CONTINUED ON NEXT PAGE)

CLEARING, LEVELING,	Stage 1	Inherent moisture with water sprays only on an as- needed basis
	Stage 2	Increase use of water sprays until fugitive dust is controlled
	Stage 3	Minimize and reduce operations
EARTH MOVING, EXCAVATION	Stage 1	Inherent moisture with water sprays only on an asneeded basis
	Stage 2	Increase use of water sprays until fugitive dust is controlled
	Stage 3	Minimize or reduce operations
CONSTRUCTION, DEMOLITION	Stage 1	Water sprays only on an as-needed basis
	Stage 2	Increase use of water sprays until fugitive dust is controlled
	Stage 3	Minimize or reduce operations
DRILLING, BLASTING, PUSHING OPERATIONS	Stage 1	Perform the activity in the early morning when ground is still moist
	Stage 2	Use water sprays on the area where activity will occur
	Stage 3	Minimize or reduce operations
MATERIAL PROCESSING** (includes crushing and screening type operations)	Stage 1	Inherent moisture with water sprays only on an asneeded basis
	Stage 2	Increase use of water sprays until fugitive dust is controlled
	Stage 3	Minimize or reduce operations

OTHER	Stage 1	
	Stage 2	
	Stage 3	

^{**} If processing other than crushing or screening occurs the fugitive dust controls for those operations are addressed in the OTHER category

Activity Specific Off-Site Fugitive Dust Control

G-P Gypsum will control off-site of fugitive dust, which includes track-out, with the following control strategies

OFF-SITE ACTIVITY	CONTROL STRATEGY		
FUGITIVE DUST ESCAPING FROM TRUCK BEDS	Stage 1	Inherent moisture in material	
	Stage 2	Use a synthetic cover for haul trucks	
	Stage 3	Minimize or reduce operations	
TRACK-OUT	Stage 1	Minimize or eliminate number of trucks entering/leaving facility propery	
	Stage 2	Use of a sweeper to clean the road from track-out	
	Stage 3	Utilize a tire wash	

ATTACHMENT 1

Responsible Parties for Fugitive Dust Control

Responsible Parties for Fugitive Dust Control

OPERATOR	Georgia Pacific Gypsum	
Contact Name	Dave Jolley	
	•	
Position	Manager, Gypsum Quality Control	
Phone Number	435-201-2341	
OWNER	Georgia Pacific Gypsum	
Contact Name	Dave Jolley	
Position	Manager, Gypsum Quality Control	
Phone Number	435-201-2341	

ATTACHMENT 2

Fugitive Dust Management, Acknowledgement and Certification

Fugitive Dust Management, Acknowledgement and Certification

Contractor					-
Contact Name					
Position					
Phone Number	-				
Start Date on Project					
Finish Date on Project					
requirements of this will instruct all employed plan to control fugits maintenance and any may be directly relativished to fug may be monetarily as fine. The Contractor and/or operator listed	loyees of the Con ive dust The C fugitive dust viol ted to the Contra ative dust non-co issessed to the Con will report any f	ntractor on site to ontractor is equalitions from the actor or its emp impliance that contractor by the or fugitive dust con	to follow guide hally responsible Utah Division bloyees Any an be attributed wher and/or opensible to follow the state of	elines set for le for fugitive of Air Qualitand all subset to the Con- erator receive	in the re dust ty that equent tractor ing the
Contractor					
Company Name (Printed	<u>d)</u>				
Name (Printed)					
Signature		Date			

Appendix D

General Site Safety and Training Plan Addendum

Georgia Pacific Gypsum - Sigurd, Utah

General Training and Site Safety Plan Addendum for Landfill Operations

This plan was developed for the safety of landfill operators and operations at the Sigurd facility, in accordance with Utah Department of Environmental Quality Administrative Code R315-302-2(2)(n)

Training will include the following topics

- 1 0 Apphcability
- 2 0 Frequency
- 3 0 Information and Awareness
- 4 0 Equipment Operation
- 5 0 Emergency Procedures and Notification

1 0 Applicability

- A All landfill operators must have received the general site safety training prior to receiving this training (Note During monthly safety meetings, waste identification and disposal methods are discussed)
- B All landfill operators will receive this training in addition to the general site safety training
- C New or transferred employees who have landfill responsibilities will receive this training prior to working at the landfill
- D A new or transferred employee who has not received this training may work at the landfill under the direct supervision of a trained landfill operator under a) temporary or emergency conditions, or b) up to a period of 90 days, starting with the day the new or transferred employee began working at the landfill

20 Frequency

A All applicable employees will receive this traming on an annual basis, or when significant changes occur at the landfill

3 0 Information and Awareness

Training will include

- A A review of the landfill permit conditions
- B A list of acceptable and unacceptable waste for the landfill
- C Guidelines for maintaining the landfill, (fill, cover, inspections, etc.)
- D Proper record keeping of wastes received
- E Unacceptable waste procedures (discussed in the monthly safety meetings)
- F Alternative waste disposal in the event that the landfill is unavailable

40 Equipment Operation

A The Safety Officer or their designee will determine that all landfill operators are tramed in the proper operation of all landfill equipment

50 Emergency Procedures and Notification

A All landfill operators will be tramed on proper landfill emergency notification procedures Emergency procedures and/or contact numbers will be made available to all landfill operators

Appendix E

Seed Mix and Application Rates

GPG Seed mix

Per Larry Greenwood, BLM Richfield Office, 5/23/02

- 1) Drill the seed with a tractor, (about \$12-\$15 an hour)
- 2) 10 pounds/acre application rate
- 3) Seed mix

Common Name	Scientific Name	Per Acre
Indian Rice Grass, variety nezpar	Oryzopsis hymenoides	1 5 lbs
Sheep Fescue, variety covar	Festuca ovina	1 5 lbs
Great Basın Wıld Rye, varıety magnar	Elymus cinereus	1 5 lbs
Squirrel Tail	Sitanion hystrix	1 5 lbs
Apar Lewis Flax	Linum lewisii	2 0 lbs
Four Wing Saltbush	Atriplex canescens	1 0 lb
Chffrose	Cowama stansburiana (mexicana)	1 0 lb

Appendix F

Post Closure Form

and Post Closure Costs Spreadsheets

GP Gypsum

Post-Closure Landfill Inspection Form

Date	Time	Landfill Cell	Name	Signature	Inspect for manfunctions, deterioration, operator errors, discharges that cause or may cause a threat to human health or the environment, any other abnormal conditions
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			· 	<u></u>	

PLEASE PRINT ALL INFORMATION

Note (a)	The Brush Mine sub	mitted a reclar	nation plan to	DOGM conta	uning a mulchi	na seedina a	and fertilizin	ıa .	
11010 (4)	cost/ac of \$1300 in N							Ĭ	
	Georgia Pacifie's mil								
	Cost escalation from								
	Therefore escalation	n factor is 100	/87 1 = 1 1481	Therefore 1	the 2009 cost =	1300 x 1 14	81 = \$1493		
<u>_</u>									
Note (b)	Cover Volumemetno	s							
		area(acres)	sq yds	depth (in)	depth (yd)	cu yds			_
	final cover	8 2	39688	18	0 5000	19844			
ļ									_
 -	top cover	8 2	39688	6	0 1667	6615		ļ	
			· · · · · · · · · · · · · · · · · · ·						_
L		L							
Ni-t- ®	Clara Darradina Va				T			r	
Note ©	Slope Regrading Vo	area (sq ft)	length (ft)	volumo(cuft)	volume(cuyd)				
	push wet waste pile	area (sq ii)	lengin (ii)	voiume(cuit)		(from Volum	otrice work	hook0	
├ ──	section 3 3	47 5	300	14250		(iloili voluli	ICINCS WOLK	DOOKU	
 	100011011 0 0		300	Total	32994				
 					02004				
H 1	Stnpping and Stockp	uling topsoil ar	nd soil		volume(cuyd)				
 		1	T	t	(,-,-,				_
					, , , ,	Ì			
	•		•						·
Note (d)	Remove Equipment	<u> </u>		1					
<u> </u>							_		
	This component is N	ot Applicable t	to this site as a	all equipment	is mobile				
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	1	<u> </u>							<u> </u>
Nete (a)	I Cita Inanantian and I	Janaad kaanin	~		i				
Note (e)	Site Inspection and		g Inspec/yr	# yrs inpect	total baurs	\$/hr labor	\$/hr- truck	C/br total	
├──┼		12	2	30	720		10 65		
	Labor rate for Outsid				720	00 00	10 00	77 00	
 	Pickup truck rate M								
						<u> </u>		<u>' </u>	_
Note (f)	An archeological pro	fessional mon	itor will be on	site dunng th	e hours when i	reclamation a	ctivities are	occuring	·
	This person will ensi								
	activities will entail u	p to approxima	ately 40 hours	An additiona	al 10 hours of t	ravel time is a	ssumed T	herefore a	total
	of 50 hours is assum	ned for this act	ivity						
Note (g)	Soil Replacement								
<u>_</u> _	Assume 25% of tota	acreage at a	depth of 6 wo	ould have to b	pe replaced		L		
		ļ <u>.</u>				ļ			
├	area (acres)	sq yds	% replaced	depth (in)	depth (yd)	cu yds			
	4 7	22748	0 25	6	0 1667	948			ļ .
<u> </u>	<u> </u>	<u> </u>	<u> </u>	 				<u> </u>	
Note (h)	Vegetation Reseedii		<u> </u>	<u> </u>		ļ			<u> </u>
	Assume 25% of total	ı acreage wou	id nave to be	reseeded	-	 		ļ <u>.</u>	
 -		 	 	oron (anasa)	0/ roossdad	acres			
 		 	+		% reseeded 0 25	resseded		-	
	1		l	47	U 25	1 175		L	

notes page 1

Cost Estimate for POST- CLOSURE of Georgia Pacific Gypsum Sigurd Landfill

(12/11/09)

Note Numbering format follows the DSHW Preparation of Closure	Post Closure Cost Estimate Guidance	
The numbered items in the guidance document not shown in t	this estimate denote they are not applicable	

	Item	Unit Measure	Cost/Unit	No Units	Total Cost	Source	Note
		<u> </u>				<u> </u>	<u> </u>
10	Engineering Costs	<u></u>					
12	Site Inspection and Record	hours	77 00	720	55440		see Note (e)
	keeping						
20	Maintenance Costs						
211	Soil Replacement	cu yd	2 81	948	2663	Means2009 31 23 16 50 2000	scraper costs
212	Vegetation Reseeding	acres	1493	1 175	1754		see Notes (a) & (g)&(h)
							
	Subtotal				59858		
	10% Contingency	L			5986		1
	Post Closure Care Total				\$ 65 843		

postclosure page 2

Cost Estimate for CLOSURE of Georgia Pacific Gypsum Sigurd Landfill

(12/11/09)

Note	Numbering format follows the DSHW Preparation of Closure Post Closure Cost Estimate Guidance		
	The numbered items in the guidance document not shown in this estimate denote they are not applicable		

	ltem	Unit Measure	Cost/Unit	No	Units	Total	l Cost	Source		Note
10	Engineering & Preliminary									
	Site Work		i							
11	Topographic Survey	acre	525		47	\$	2 468	Means2009 02 21 1	3 09 0020	
14	Development of Plans			Г						see below Subtotal
15	Contract Administration			Г						see below Subtotal
16	Administrative Costs for			Г		Г				see below Subtotal
	final cover certification &			Г						
	closure notice			Г						
17	Project Management			Г						see below Subtotal
19	Other Permit Requirements	hours	75		50	\$	3 750			see note (f)
1 12	Remove Equipment			Ц			0			see note (d)
	Subtotal	 		┝		\$	6 218	<u> </u>		
	10% Contingency						622			
	Engineering Subtotal					\$	6 839			

	Item	Unit Measure	Cost/Unit	No Units	Total Cost	Source	Note
		<u> </u>					
20	Construction						
2 1	Final Cover System						
2 1 la	Soil Placement	cu yd	1 19	19844	\$ 23614	Means2009 31 23 16 46 S000	dozer costs note (b)
2 1 le	Soil Transportation	cu yd	2 81	19844	\$ 55 762	Means2009 31 23 16 50 2000	scraper costs note (b)
22	Completion of Top Cover						
221	Infiltration Layer						
2 2 1a	Soil Placement	cu yd	1 19	6615	\$ 7871	Means2009 31 23 16 46 5000	dozer costs note (b)
2 2 1e	Soil Transportation	cu yd	2 81	6615	\$ 18 587	Means2009 31 23 16 50 2000	scraper costs note (b)
23	Erosion Layer Placement						
232	Soil Placement	cu yd	1 19	0	\$	Means2009 31 23 16 46 5000	dozer costs note (b)
235	Soil Transportation	cu yd	2 81	0	\$	Means2009 31 23 16 50 2000	scraper costs note (b)
24	Revegetation				l		
24123	Seeding Fertilize Mulch	acre	1493	47	\$ 7017	Brush mine reclam costs	see note (a) calcs tab
251	Site Regrading	cu yd	1 19	32994	\$ 39 263	Means2009 31 23 16 46 5000	dozer costs note (c)
252	Top soil stnpping	cu yd	1 19	6615	\$ 7871	Means2009 31 23 16 46 5000	stnp top soil from borrow pit
253	General soil stripping	cu yd	1 19	19844	\$ 23 614	Means2009 31 23 16 46 5000	stnp general soil from borrow pit
	Subtotal	<u> </u>			\$ 152 114		
	10% Contingency	L			15 211		
	Construction Subtotal				\$ 167 326		

3 0 Gaa Collection System is not applicable for this site

	ltem	Unit Measure	Cost/Unit	No Units	Total Cost	Source	Note
40	Monitor Well Costs						
	Not applicable for this site						

CALCULATION OF TOTAL CLOSE	JRE COSTS		
Engineering Total	 	\$ 6839	
Construction Total		\$ 167 326	
SUBTOTAL		\$ 174 165	
Development of Plans	2 5% of Subtotal	4 354	
Contract Administration	3 5% of Subtotal	6 096	
Administrative Costs for	3 5% of Subtotal	6 096	
final cover certification &			
closure notice			
Project Management	3 5% of Subtotal	6 096	
Performance Bond	1 0% of Subtotal	1 742	
Legal Fees	10% of Subtotal	17 417	
GRAND TOTAL CLOSUF	RE COSTS	\$ 215 965	

Appendix G

Financial Assurance and Ownership Documentation



April 6, 2010

Georgia-Pacific LLC
Corporate Risk Management

133 Peachtree Street NE (30303-1847) P O Box 105605 Atlanta, Georgia 30348-5605 (404) 652-4162 (P) (404) 654-1006 (F) www gp com

Teri A WallRisk Manager – Environmental and

Contracts

Sohd and Hazardous Waste Control Board State of Utah 195 North 1950 West – 2nd Floor PO Box 144880 Salt Lake City, UT 84114-4880

> RE Georgia-Pacific Gypsum LLC – Financial Assurance Sigurd, UT – On-Site Class III Landfill

Dear Sir or Ma'am

Please fmd enclosed a copy of the Amendment to Irrevocable Letter of Credit No 97053/80085 This document represents financial assurance for the above-referenced environmental operation at our Sigurd gypsum facility. It is sent to you pursuant to the State of Utah's requirements for landfills

As usual, Scotiabank automatically forwarded the original amended mistrument to your office's attention. This package is simply a courtesy copy for your files. The facility is in receipt of a copy of the mistrument as well, and is maintaining it on file in case of inspection.

URGENT - ACTION REQUIRED'

Scotiabank Amendment No. 97053/80085 represents a decrease to the amount of the Letter of Credit Please sign the amendment tracer, indicating your acceptance of the information described therem, and return it to the bank. If this last step is not completed, the bank will not consider the instrument processed, and the amendment will not take effect

If you have any questions or comments regarding this subject, please do not hesitate to contact me Thank you for your prompt attention to this matter

Sincerely,

Deri A 13/211

Enclosure

cc D W Jolley – UT020 (w/ encl) W E Barger (w/ encl)



New York Agency

One Liberty Plaza, New York, N Y 10006

March 26, 2010

Executive Security, Sohd and Hazardous Waste Control Board of the State of Utah P O Box 144880 Salt Lake City, Utah 84114-4880

Gentlemen

Re Irrevocable Standby Letter of Credit No 97053/80085

At the request of Georgia-Pacific LLC, 133 Peachtree Street, N E, Atlanta, GA 30303, on behalf of GP Gypsum LLC, 200 S State St, Sigurd, UT 84657, we hereby amend our above-mentioned Letter of Credit as follows

 Letter of Credit amount decreased by USD180,000 00 to an available balance of USD66,000 00

All other terms and conditions remain unchanged

This amendment is to be considered an integral part of this Letter of Credit and must be attached thereto

Except so far as otherwise expressly stated herem, this Irrevocable Standby Letter of Credit is subject to the most recent edition of the Uniform Customs and Practice for Documentary Ciedits, published and copyrighted by the International Chamber of Commerce, or "the Uniform Commercial Code"

Authorized Signature

Very trulyyyolirs,

Authorized Signature

Authorized Signature

PLEASE SIGNIFY YOUR ASRESHENT/DISAGRESMANT TO THIS AMBEDMENT BY RATUBNING TO THE BANK OF NOVA SCOTIA, NEW YORK AGENCY A SIGNED COPY OF THIS AMENDMENT AS INDICATED BALON

•	,	****	701177	•	,	 	
(AK	B					 	
CII	LE	_					
OM	PA	NY					

Ouit Claim Deed - 00346867

Entry Number00346867

Book Page 0569 0756 Recording Date05/02/2007 02 47 33 PM

Fee\$20 00

Consideration\$10.00 Instrument Date12/31/2006

From

GEORGIA-PACIFIC CORPORATION GEORGIA-PACIFIC GYPSUM LLC

GEORGIA-PACIFIC

G P GYPSUM CORPORATION

Subd SIGURD TOWNSITE SURVEY S 6 T 23S R 1W BEG AT A PT N 24* W 2 262 FT FROM TH SW COR OF SEC 6 T23S R 1W SLM TH N 20* W 465 FT TH S 7*45' E 661 FT TH S 5* W 443 5 FT TH N 86*45' W 466 FT TO THE POB

Quarter SES 21 T 22S R IW THE S/2 OF THE SE/4 AND THE S/2 OF THE SE/4 OF THE SW/4 OF SEC 21 T22S R IW SLM (4-101 3)

S 22 T 22S R 1W THE SOUTH 20 ACRES OF LOT 11 SECTION 22, TOWNSHIP 22 SOUTH, RANGE 1 WEST, SALT LAKE BASE AND MERIDIAN BEING ALSO DESCRIBED AS LOT 13 IN SAID SECTION AND SIGURD QUARRY NO 9 (4-102-4)

Subd SIGURD TOWNSITE SURVEY Quarter NE S 1 T 23S R 2W COM 2 4 CHS W OF THE CENTER OF THE NE/4 OF SEC 1 T23S R2W SLM TH S 21*45' W 1 21 CHS TH N 85* 30' W 4 1 CHS TO THE STATE HIGHWAY TH N 22*42' W 0 87 CHS TO THE FORTY LINE THE TO THE POB (2-S113)

Subd. SIGURD TOWNSITE SURVEY Quarter. NE S 1 T 23S R 2W COM AT A PT 57 LINKS N OF THE SE CORNER OF THE SW QUARTER OF THE NE QUARTER OF SEC 1 T23 S R2W SLM TH E 102 FT THE N TO THE S SIDE OF THE ST HWY TH NWLY ALG THE S SIDE OF SAID STATE HWY TO FORTY LINE TH SH ALG SAID FORTY LINE TO BEG (2-S12 1)

Parcel Number Account Number

4-186-13

4 101-3

4 102-4

2 S11-3

2-S12 1

0124798 Account

SA-N4-186-13 ETAL 9000478 Account

Related Information

Entry Number Book Page

Appendix H

Log Sheets

Section 1 – Landfill Waste Log

Section 2 – Inspections

GP Gypsum

Landfill Inspection Form

Date	Time	Landfill Cell	Name	Signature	Inspect for manfunctions, deterioration, operator errors, discharges that cause or may cause a threat to human health or the environment, any other abnormal conditions
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PLEASE PRINT ALL INFORMATION

GP Gypsum

Landfill Log

Date	Name	Cover Applied? Y N	Size of Load cubic Yards	Contents of Load
		 		
		 		
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		1		
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		+		
		+		
<u>-</u> -		 		

Please Pnnt All Information

Appendix I

Application Form and Checklist

Utah Class III Landfill Permit Application Form

Part / General	rt F General Information APPLICANT PLEASE COMPLETE ALL SECTIONS												
Landfill Type	3 ==	ss Illa ss Ill		// Applic	cation Type			Application ewal Applicatio	n			ity Expa fication	
For Renewal Applic	ations Facility	Expar	ision /	Applications a	and Modifications	s Ente	er Current Pe	rmit Number		_			
III Facility Nar	ne and Loc	atıor	1					_			;		
Legal Name of Faci Geor	lity gıa-Pacıfı	∟c Gy	psur	n LLC			•			į			
Site Address (street									С	ounty	Sevie	r	
City Sigi	ırd				State UT		Zıp Code	84657	Tele	ephone	(435)	896-03	81
Township 23S	Range 2	J	Sec	tion(s) 1	_	Qu	arter/Quarter	Section		Quarter	Section		
Mam Gate Latitude	degrees		minu	utes	seconds		Longitude	degrees		minutes	_	second	is
IV Facility Ow	ner(s) Info	rmati	on	74	y not			The state of the s	A CONTRACTOR	•	- 1	, न	1
Legal Name of Faci	lity Owner Ge	orai	a-Pa	acıfıc Gy	rosum LLC						=		
Address (mailing)		1401		Highway									
City Las Vega	ıs				State NV		Zıp Code	89033	Tele	phone	(702)	643-81	00
V Facility Ope	rator(s) Inf	orma	ition	100 Sec. 1	*.			-	·			, '	7° 1 %
Legal Name of Faci		- San	ne -		-						=		
Address (mailing)													
City					State		Zıp Code		Tele	phone			
VI. Property O	garan.	orma	tion	S. A.			· 表			,			系統的
Legal Name of Prop	erty Owner	- Saı	me -										
Address (mailing)					-		_	·			·		
City					State		Zıp Code		Tele	ephone			
VII. Contact In	formation	7 3			***	E Sir					The state of the s	14. °	a-
Owner Contact	David J	Neal					Title P1	ant Manager					
Address (mailing)	11401 U S	3 H1	.ghwa	ny 91									
City	Las Vega	š			State NV		Zıp Code	89033	Tele	phone	(702)	643-81	.00 x302
Email Address	djneal@g	apac	com	<u>_</u>			Alternative Te	elephone (cell or o	ther)				
Operator Contact	Dave Jol	l <u>ey</u>					Title	Manager, Gy	psu	m Qualı	ty Con	trol_	
Address (mailing)	200 S S	tate	Str	eet									
City	Sigurd				State UT		Zıp Code	84657	Tele	ephone	(435)	201-23	41
Email Address	dwjolley	@gap	ac c	om_	_		Alternative T	elephone (cell or o	ther)		(435)	633-0	332
Property Owner Co	ntact _{- Sa}	me -		-			Title						
Address (mailing)	-				-		_						
City					State		Zıp Code		Tele	ephone			
Email Address							Alternative To	elephone (cell or o	ther)				

Utah Class III Landfill Permit Application Form

Part / General Information (Continued)	· San
VIII Waste Types (check all that apply)	IX Facility Area
All types of non hazardous mdustnal waste generated by the facility OR the following specific waste types	Facility Area 60 acres
Waste Type Combined Disposal Unit Monofill Unit	Disposal Area <u>5</u> acres
Construction & Demolition	Design Capacity
☐ Incinerator Ash ☐ ☐	Years1
☐ Animals ☐ ☐ Asbestos ☐ ☐ Other Gypsum Products ☐	Cubic Yards185,000
Note All waste types must be generated by the industry which owns the facility	Tons
X Fee and Application Documents	
	oplication Fee Amount \$
☑ Facility Map or Maps ☑ Facility Legal Description ☐ Ground Water Report ☑ Closure Design	 ✓ Plan of Operation ✓ Waste Description ✓ Financial Assurance
I HEREBY CERTIFY THAT THIS INFORMATION AND ALL AT	TACHED PAGES ARE CORRECT AND COMPLETE
Signature of Authonzed Owner Representative	Title Date
	Plant Manager
David J Neal	Address
Name typed or pnnted	11401 U S Highway 91, North Las Vegas, 89036
Signature of Authorized Land Owner Representative (if applicable)	Title Date
	Address
Name typed or pnnted	
Signature of Authonzed Operator Representative (if applicable)	Title Date
	Address
Name typed or pnnted	

Utah Class III Landfill Permit Application Form

Part I General Information (Continued)	
VIII. Waste Types (check all that apply)	IX. Facility Area
All types of non-hazardous industrial waste generated by the facility OR	Facility Area 60 acres
the following specific waste types Waste Type Combined Disposal Unit Monofill Unit	Disposal Area <u>5</u> acres
	Design Capacity
Construction & Demolition	Years 1
Animals	Cubic Yards 195,000
Asbesios Nother Gypsum Products	700,000
Note All waste types must be generated by the industry which owns the facility	Tons 200,000
X. Fee and Application Documents	
Indicate Documents Attached To This Application	oplication Fee Amount \$
☐ Facility Map or Maps ☐ Facility Legal Description ☐ Ground Water Report ☐ Closure Design	Plan of Operation Waste Description
☐ Ground Water Report ☐ Closure Design	
I HEREBY CERTIFY THAT THIS INFORMATION AND ALL AT	TACHED PAGES ARE CORRECT AND COMPLETE
Signature of Authorized Owner Representative	Title Date
	Plant Manager 11-3-09
David J Neal	Address
Name typed or printed	11401 U.S. Highway 91, North Las Vegas 89030
Signalure of Authorized Land Owner Representative (if applicable)	Title Date
	Address
Nams typed or printed	
Signature of Authorized Operator Representative (if applicable)	Title Date
	Address
Name typed or pnnted	

Signatory Delegation

This document provides, pursuant to the requirements of the United States Environmental Protection Agency or the appropriate States or local regulatory agencies, environmental signatory authorization for designated management positions of the following facilities owned and operated by Georgia-Pacific Gypsum LLC

Acme, TX	Fort Dodge, IA	San Leandro, CA
Antioch, CA	Las Vegas, NV	Savannah, GA
Blue Rapids, KS	Long Beach, CA	Sigurd, UT
Brunswick, GA	Lovell, WY	Sweetwater, TX
Camden, NJ	Marietta, GA	Tacoma, WA
Canby, OR	Milford, VA	Wheatfield, IN
Cuba, MO	Newington, NH	
Decatur, GA	Pryor, OK	

Management positions that are responsible for the overall operation of their respective facilities are hereby delegated as having signatory authority for environmental permit applications, registrations, certifications, compliance reports, and any other environmental document that may require signature by a "responsible official" or "duly authorized representative", as allowed by Federal, State and/or local regulations These designated managerial positions are Regional Manager, Center Manufactunng Manager, Plant Manager, persons acting in the position of Plant Manager, and Manager of Research and Development

This signatory authority is intended to apply to the fullest extent allowed by applicable law, regulation and / or permit

GEORGIA-PACIFIC GYPSUM LLC

3/01/08

Important Note The following checklist is for the permit application and addresses only the requirements of the Division of Solid and Hazardous Waste. Other federal, state, or local agencies may have requirements that the facility must meet. The applicant is responsible to be informed of, and meet, any applicable requirements. Examples of these requirements may include obtaining a conditional use permit, a business license, or a storm water permit. The applicant is reminded that obtaining a permit under the Solid Waste Permitting and Management Rules does not exempt the facility from these other requirements.

An application for a permit to construct and operate a landfill is documentation that the landfill will be located, designed, constructed, operated, and closed in compliance with the requirements of Rules R315-304 of the *Utah Solid Waste Permitting* and *Management Rules* and the *Utah Solid* and *Hazardous Waste Act (UCA 19-6-101 through 123)* The application should be written to be understandable by regulatory agencies, landfill operators, and the general public. The application should also be written so that the landfill operator, after reading it, will be able to operate the landfill according to the requirements with a minimum of additional training

Copies of the Solid Waste Permitting and Management Rules, the Utah Solid and Hazardous Waste Act, along with many other useful guidance documents can be obtained by contacting the Division of Solid and Hazardous Waste at 801-538-6170 Most of these documents are available on the Division's web page at www hazardouswaste utah gov Guidance documents can be found at the solid waste section portion of the web page

When the application is determined to be complete, the original complete application and one copy of the complete application are required along with an electronic copy

Part II Application Checklist

Facility General Information	1 un	
Description of Item	Location In Document	
la General Information For - All Facilities		
Completed Part I General information		
General description of the facility (R315-310-3(1)(b))	Pag e 1	
Legal description of property (R315-310-3(1)(c))	Page 1	
Proof of ownership, lease agreement, or other mechanism (R315-310-3(1)(c))	Appendix G	
A demonstration that the landfill is not a commercial facility	Page 2	
Waste type and anticipated daily volume (R315-310-3(1)(d))	Page 2	
Intended schedule of construction (R315-302-2(2)(a))	Page 2	
Ib General Information - New Or Laterally Expanding Class III Landfills	water with	
Documentation that the facility has meet the historical survey requirement of R315-302-1(2)(f) (R315-305-4(1)(b) or R315-305-4(2)(a)(iv))	Page 2	
Name and address of all property owners within 1000 feet of the facility boundary (R315-310-3(2)(i))	Page 2	
Documentation that a notice of intent to apply for a permit has been sent to all property owners listed above (R315-310-3(2)(ii))	Page 2	
Name of the local government with junsdiction over the facility site (R315-310-3(2)(III))	Page 2	

/ Facility General Information	
Description of Item	Location In
/c Location Standards - New Class IIIa Landfills (R315-304-4(1))	Document
Geology	
Geologic maps showing significant geologic features, faults, and unstable areas	
Maps showing site soils	
Surface water	
Magnitude of 24 hour 25 year and 100 year storm events	
Average annual rainfall	
Maximum elevation of flood waters proximate to the facility	
Maximum elevation of flood water from 100 year flood for waters proximate to the facility	
Wetlands	
Ground water	
Histonic Preservation Survey	
/d Additional Location Standards - New Class IIIa Landfills Not On Waste Generation Site	The same of the sa
Land use compatibility (R315-304-4(1)(a))	2 41 Above
Maps showing the existing land use, topography, residences, parks, monuments, recreation areas or wilderness areas within 1000 feet of the site boundary	
Certifications that no ecologically or scientifically significant areas or endangered species are present in site area	
List of airports within five miles of facility and distance to each	
le Location Standards - New Class IIIb Landfills	
Floodplains as specified in R315-302-1(2)(c)(ii) (R315-304-4(2)(a)(i))	Page 2
Wetlands as specified in R35-302-1(2)(d) (R315-304-4(2)(a)(ii))	Page 3
The landfill is located so that the lowest level of waste is at least ten feet above the historical high level of ground water (R315-304-4(2)(a)(III))	Page 3
Historical Preservation Survey (R315-304-4(2)(a)(iv))	Page 2
If Plan of Operations - All Class III Landfills (R315-310-3(1)(e) and R315-302-2(2))	
Description of on-site waste handling procedures and an example of the form that will be used to record the weights or volumes of waste received (R315-302-2(2)(b) And R315-310-3(1)(f))	Page 3
Schedule for conducting inspections and monitoring, and examples of the forms that will be used to record the results of the inspections and monitoring (R315-302-2(2)(c), R315-302-2(5)(a), and R315-310-3(1)(g))	Page 3
002-2(2)(0), 1\(\delta\) 13-302-2(3)(a), and 1\(\delta\) 13-310-3(1)(\(\gamma\))	1 ~

/ Facility General Information	-
Description of Item	Location In Document
Contingency plans in the event of a fire or explosion (R315-302-2(2)(d))	Page 3
Plan to control fugitive dust generated from roads, construction, general operations, and covening the waste (R315-302-2(2)(g))	Page 3 & App C
Plan for letter control and collection (R315-302-2(2)(h))	Page 3
Procedures for excluding the receipt of prohibited hazardous or PCB containing wastes (R315-302-2(2)(j))	Page 4
Procedures for controlling disease vectors (R315-302-2(2)(k))	Page 4
A plan for alternative waste handling (R315-302-2(2)(I))	Page 4
A general training and safety plan for site operations (R315-302-2(2)(o))	Page 4 & App D
Any recycling programs planned at the facility (R315-303-4(6))	Page 4
Any other site specific information pertaining to the plan of operation required by the Executive Secretary (R315-302-2(2)(p))	
/g Ground Water Monitoring - Class Illa landfills	ا مین
Ground Water Monitonng Plan (R315-304-5(4)(a)	
// Facility Technical Information	The state of the s
Ila Maps - All Class III Landfills	
Topographic map drawn to the required scale with contours showing the boundaries of the landfill unit, ground water monitoning well locations, gas monitoning points, and the borrow and fill areas (R315-310-4(2)(a)(i))	Appendix B
Most recent U S Geological Survey topographic map, 7-1/2 minute senes, showing the waste facility boundary, the property boundary, surface drainage channels, any existing utilities and structures within one-fourth mile of the site, and the direction of the prevailing winds (R315-310-4(2)(a)(ii))	Appendix B
//b Geohydrological Assessment - Class IIIa Landfills (R315-310-4(2)(b))	The state of the s
Local and regional geology and hydrology including faults, unstable slopes and subsidence areas on site (R315-310-4(2)(b)(i))	
Evaluation of bedrock and soil types and properties including permeability rates (R315-310-4(2)(b)(ii))	
Depth to ground water (R315-310-4(2)(b)(III))	
Quantity, location, and construction of any private or public wells on-site or within 2,000 feet of the facility boundary (R315-310-4(2)(b)(v))	
Tabulation of all water nghts for ground water and surface water on-site and within 2,000 feet of the facility boundary (R315-310-4(2)(b)(vi))	

/ Facility General Information	
Description of Item	Location In Document
Identification and description of all surface waters on-site and within one mile of the facility boundary (R315-310-4(2)(b)(vii))	
For an existing facility, identification of impacts upon the ground water and surface water from leachate discharges (R315-310-4(2)(b)(viii))	
Calculation of site water balance (R315-310-4(2)(b)(ix))	
Ile Engineening Report - Plans, Specifications, And Calculations - All Class III Landfills	,
Unit design to include cover design, fill methods, and elevation of final cover including plans and drawings signed and sealed by a professional engineer registered in the State of Utah, when required (R315-310-3(1)(b))	
Design and location of run-on and run-off control systems (R315-310-5(2)(b))	
IId Engineering Report - Plans, Specifications, And Calculations - Class IIIa Landfills	
Engineering reports required to meet the location standards of R315-304-4 including documentation of any demonstration or exemption made for any location standard (R315-310-4(2)(c)(i))	`
Anticipated facility life and the basis for calculating the facility's life (R315-310-4(2)(c)(ii))	
Equipment requirements and availability (R315-310-4(2)(c)(iii))	
Identification of borrow sources for daily and final cover and for soil liners (R315-310-4(2)(c)(iv))	
Run-off treatment and disposal and documentation to show that any treatment system is being or has been reviewed by the Division of Water Quality (R315-310-4(2)(c)(v) and R315-310-3(1)(i))	
//e Closure Requirements - All Class III Landfills	No A W
Closure plan (R315-310-3(1)(h))	Page s 6 - 13
Closure schedule (R315-310-4(2)(d)(ı))	Pages 12 & 13
Design of final cover (R315-310-4(2)(c)(iii))	Page 10
Capacity of site in volume and tonnage (R315-310-4(2)(d)(ii))	Page 12
Final inspection by regulatory agencies (R315-310-4(2)(d)(iii))	Page 12 & 13
III Post-Closure Care Requirements - All Class III Landfills	- 1 43 4 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
Post-closure care plan (R315-310-3(1)(h))	Page 13 & 14
Changes to record of title, land use, and zoning restrictions (R315-310-4(2)(e)(ii))	
Maintenance activities to maintain cover and mn-on/run-off control systems (R315-310-4(2)(e)(iii))	Page 13
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I Facility Genera	l Information	
	Description of Item	Location In Document
	s, and telephone number of the person g the post-closure care penod (R315-	
Ilg Financial Assu	ırance Requirements - All Class	s III Landfills
Identification of closure	e costs including cost calculations (R3	15-310-4(2)(d)(iv)) Appendix F
Identification of post-ci 4(2)(e)(iv))	losure care costs including cost calcul	ations (R315-310- Appendix F
	ancial assurance mechanism that mee the date that the mechanism will beco 0-3(1)(j))	

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