



SIMPLLOT PHOSPHATES LLC
(435) 789-7795

9401 NORTH HWY 191

VERNAL, UTAH 84078

Division of
Solid and Hazardous Waste

MAR - 1 2013

SW 128

2013-002154

February 27, 2013

Scott T. Anderson, Director
Division of Solid and Hazardous Waste
P.O. Box 144880
Salt Lake City, Utah 84114-4880

Subject: Submission of Simplot Phosphates' 2012 Solid Waste Landfill Annual Report

Dear Mr. Downs:

Enclosed, please find Simplot Phosphate's Solid Waste Landfill Annual Report for this past year. Also attached with the report is:

1. Financial Assurance Report and Reclamation Calculations.
2. Life of Landfill Calculations.
3. Training Report.

Our landfill is now currently inactive and has been inactive for all of last year. It is our intent and our desire to maintain our permit for our class IIIb landfill, but keep it inactive and preserve it for future use. We again covered the industrial waste and re-educated to workers as to the landfill procedures and status.

If you have any questions or concerns feel free to contact me at (435) 781-3348

Sincerely,

John Spencer
Environmental / Senior Mining Engineer
Simplot Phosphates LLC
9401 N. Hwy 191
Vernal, UT 84078
Ph (435) 781-3348
Fax (435) 781-3332
John.Spencer@Simplot.com

SW/28

LANDFILL ANNUAL REPORT

For Calendar year 2012

MAR - 1 2013

2013-002154

Administrative Information (Please enter all the information requested below)

Facility Name: Simplot Phosphates LLC

Facility Mailing Address: 9401 N Hwy 191

(Number & Street, Box and/or Route)

City: Vernal Zip Code: 84078

County: Uintah Permit Number: 9908

Owner

Name: Simplot Phosphates LLC Phone No.: (435)789-7795

Owner Mailing Address: 9401 N. Highway 191

(Number & Street, Box and/or Route)

City: Vernal State: Utah Zip Code: 84078

Contact Name: John B. Spencer Contact Title: Environmental / Sr. Mine Engineer

Contact's Mailing Address: (Same as above)

Phone No.: (435) 781-3348 Contact's Email Address: john.spencer@simplot.com

Operator (Complete this section only if the operator is not an employee of the Owner shown above)

Name: _____ Phone No.: _____

Owner Mailing Address: _____

(Number & Street, Box and/or Route)

City: _____ State: Utah Zip Code: _____

Contact Name: _____ Contact Title: _____

Contact's Mailing Address: _____

Phone No.: _____ Contact's Email Address: _____

Facility Type and Status

- Class I
- Class IIIb
- Class V
- Facility Closed during the year
- Class II
- Class IVa
- Class VI
- Class IIIa
- Class IVb
- Date Closed: _____

Annual Disposal (Tons received at the facility for disposal)

Waste Type	Waste Origin		Total	Measurement	
	In-State	Out-of-State		Tons	Cubic Yards
Municipal	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<input type="checkbox"/>	<input type="checkbox"/>
Industrial	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<input type="checkbox"/>	<input type="checkbox"/>
C/D*	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<input type="checkbox"/>	<input type="checkbox"/>

*C/D waste includes all waste going to a Class IV or VI landfill cell

Conversion Factor Used

- None Used
- Site Specific
- From Rules
- List Site Specific Conversion: _____

Recycling

Material Recycled: 0.00

Reported in Tons Cubic Yards

Utah Disposal Fee

Disposal fee required to be paid to State Yes No (If yes please show fees paid below)

Municipal: _____ Industrial: _____ C/D: _____ Annual: _____

Municipal, Industrial and C/D are fees paid by Commercial Facilities. Annual fee is paid by facilities operated by a municipality

Current Landfill Remaining Capacity

Tons: 4,959.00 Cubic Yards: 14,168.50 Acre: 7.50 Years: 6.80

Acres Currently Open: 0.00 Acres Currently Closed: 0.00

Financial Assurance

Current Closure Cost Estimate: \$35,341.00

Current Post-Closure Cost Estimate: \$31,914.00

Current Amount or Balance in Mechanism: \$92,947.00

(If facility permit has been renewed and if balance does not equal or exceed total for closure and post-closure care please contact the Division)

Current Financial Assurance Mechanism: Bon #023-007-105

(ie. Bond, Trust Fund, Corporate or government Test etc.)

Current Financial Assurance Mechanism Holder: Liberty Mutual Insurance Company

(ie. Name of Bond Company, Bank etc. Account number)

Financial Assurance: Each facility must recalculate the cost of closure and post-closure care to account for inflation and design changes each year. The inflation factor can be found on the Division web page. Facilities that are using a trust account should include a copy of the most recent account statement.

Note Facilities using "Local Government Financial Test" or the "Corporate Financial Test" must provide the information required in R315-309-8(4) or R315-309-9(3) each year.

Other Reports and Information to be Submitted with Annual Report

Ground Water Monitoring: Class I and V landfills only. Check if exempt

Explosive Gas Monitoring: Class I, II and V landfills only. Check if exempt

Does the facility have a landfill gas collection system Yes No

If yes please briefly describe use of gas, e.g., flared or used for electricity generation.

Training Report: A report of all training programs or procedures completed by facility personnel during the year.

Signature: Mark A. Krall

Date: 2/27/2013

Signature should be by an executive officer, general partner, proprietor, elected official, or a duly authorized representative. A duly authorized representative must meet the requirements of the solid waste rules (UAC R315-310-2(4)(d)).

Type Name: Mark A. Krall

Title: Mine Manager

2012 SOLID WASTE LANDFILL ANNUAL REPORT - ATTACHMENTS

Training Report

Simplot's landfill is currently inactive as it was for all of 2012. The following is a narrative of the training programs and procedures for our site when the landfill is active.

Procedures for both operation and record keeping for the landfill have been written and implemented at this site. All employees that are involved with the landfill have been trained on these procedures and the operating plan is posted at key locations throughout the site. Every couple of years during MSHA Annual Refresher training (usually conducted in January), time is reserved to review landfill compliance. This includes reviewing with all the Simplot employees the approved waste that may be disposed of in the landfill, dumping procedures, record keeping procedures and inspection requirements along with other environmental compliance issues. In addition, this past year we were able to provide additional training in November to all our personnel, this training was focused on the different types of wastes (hazardous, universal and non-RCRA) and what is acceptable for the county and our class IIIb landfills.

As a quality control measure there are numerous inspections of the landfill by qualified environmental personnel. Inspections start with weekly dumpster inspections performed by the environmental department. This inspection consists of examining each dumpster for its contents. If something is found in the dumpster that is not approved to be disposed of in the landfill, it is removed and personnel in that location are re-instructed or re-trained on approved waste and proper disposal of the material.

Monthly Landfill Cover Reports are also filled out. These reports are completed by the mine foreman and identify the amount of dirt used in the capping of the landfill. This report includes: visually inspecting the condition of the dump, verifying the number of loads of waste disposed of in the dump, verifying that the material in the dump has been covered and visually inspecting for non-approved waste in the landfill.

Quarterly inspections of the landfill area are also performed. These inspections are also performed by qualified environmental personnel. These inspections include: visually inspecting the landfill for overall condition, checking for prohibited materials (hazardous waste, liquids, excessive organics / food wastes), condition of drainage control systems, presences of disease vectors, and any corrective actions that are needed.

2012 SOLID WASTE LANDFILL ANNUAL REPORT - ATTACHMENTS

Financial Assurance

For this past year our landfill has been kept inactive, a Surety Bond is in place with the Utah DEQ Division of Solid and Hazardous Waste (DSHW) for \$92,947 with a stand by trust as the financial mechanism for final reclamation of this landfill. This amount is based on the final reclamation of the landfill at the end of its useful life, which at our peak usage (year 2005) is approximately 7 years life from when the landfill is activated. Currently the landfill is inactive and reserved for emergency or future use so the actual life of the landfill may be 15 plus years from now. When the landfill is completed, there will be 7.5 acres of disturbance that will require reclamation. The bond with DSHW is based on this projected disturbance of 7.5 acres.

Based on the current disturbance figure, current reclamation costs for the landfill have been calculated. Attached are the annual calculations for current reclamation costs for the landfill. See the attached file titled "2012 Estimated for the cost of Closure and Post-Closure care".

2012 SOLID WASTE LANDFILL ANNUAL REPORT - ATTACHMENTS

General Information & Status of Landfill

Simplot's landfill was permitted in 2007 and the proper financial assurance put in place. For all of 2012 our class IIIb landfill has been kept inactive.

Simplot Phosphates LLC intends to keep the landfill inactive and reserve it for emergency or future use. Currently all of our industrial waste is hauled off site by a private contractor for disposal at the Uintah County landfill.