

Antimony Town Permit Attachment #2:
Plan of Operations

PLAN OF OPERATIONS

INTRODUCTION

This document constitutes the plan of operation for the Antimony Class IVb Landfill / Dead Animal Pit and is intended to comply with the Utah Division of Solid and Hazardous Waste Administrative Rules. Technical questions and comments may be directed to:

Leon Twitchell
Antimony Town Board
P.O. Box 120024
Antimony, Utah 84712
(435) 624-3227

HANDLING PROCEDURE

One of the purposes of the Antimony Class IVb Landfill is to expand integrated solid waste management techniques near Antimony. The facility will be separated into various disposal areas including:

1. Yard Wastes
2. Construction/Demolition Waste
3. Dead Animals
4. Recyclable Metal
5. Other Categories as Need and Markets Develop

Yard wastes are vegetative matter resulting from landscaping, land maintenance, and land clearing operations including grass clipping, prunings and other discarded material generated from yards, gardens, parks, farms and similar types of facilities. This type of waste does not include garbage, paper, plastics, sludge, septage or manure.

Yard wastes brought to the landfill will be placed in the designated area, separated by type (chippable tree limbs & bushes, grass clippings, and trees, trunks & stumps). The material will be held until it can be burned, chipped, or placed at the working face of the landfill. All burning will be done in accordance with Utah State Law and under the direction of the Town Fire Chief and during the periods of March 30th through May 30th, and September 15th through October 30th. No trash, rubbish, tires or oil may be used to start fires. Open burning is prohibited at the landfill, so yard wastes must be separated from the working area prior to burning. Separation may occur through the use of berms, trenches, roads, buffer zones, pits or appropriate fences. Trees, trunks and stumps may be cut and used for heating fuel, slope protection, barriers, or in other approved projects. Grass clippings and chipped material may be distributed for landscaping projects, soil amendments or other appropriate uses, including cover in other areas of the facility. Yard wastes which are not used or disposed of within one year will be transferred to the construction/demolition area for final disposal.

Construction/demolition material, including fencing designated for disposal, will be brought to the working face where it will be dumped and spread. Large timbers and recyclable lumber will be separated and held for reuse. This waste will be covered as needed for protection against fire hazard, blowing litter, odors and the propagation and harborage of rodents and insects. The cover material will be comprised of six (6) inches of earthen material. No fires will be permitted within this area of the landfill. Blowing litter will be collected on a routine basis.

Dead animals will be handled in accordance with Administrative Rules and descriptions below. Dead animals received at the facility shall be deposited in the bottom of a disposal trench designated for dead animals. All dead animals will be covered daily with a minimum of six (6) inches of earth to prevent odors and the propagation and harborage of rodents and insects. When the situation arises that dead animals must be delivered to the facility during closed periods, generators will be required to contact the owner and arrange for a landfill operator to be present during disposal. Permission for entry may be granted after pertinent information including date, name of generator, number and typed of animals disposed of is provided.

Animals delivered to the landfill under this scenario will be covered with six (6) inches of earthen material no later than 24 hours after disposition.

Bulky wastes including large appliances, furniture, car bodies and recyclable metals may be stored at the facility temporarily while a sufficient volume is being collected for transportation to a recycling facility or end user. These materials will be stored for up to one year and then transported to a facility permitted for final disposal of these materials. Batteries and fluids will be removed from car bodies prior to acceptance at the landfill.

Recent change in the solid waste regulations permit acceptance of tire and/or tire-derived material at Class IVb facilities. Tires and tire-derived material will be received and treated as construction/demolition waste until such time that hauling to a recycler becomes feasible. No more than four (4) whole tires will be accepted at one time from any generator as provided in Section 320-3 of the Rules.

Equipment to be used at the facility will consist primarily of a grader, a dump truck, a bulldozer, and a backhoe hired by Antimony Town. When additional equipment is needed, it will be hired by Antimony Town. Chippers and other processing equipment will be acquired as funds and needs dictate.

INSPECTIONS AND MONITORING

At least one operator should be on site during all times the facility is open to the public to perform inspection and monitoring functions. Inspection and monitoring at the Antimony Town Class IV b Landfill / Dead Animal Pit will be conducted in two components; (1) routine and (2) compliance. Routine inspections will be conducted on each incoming load of material as it enters the facility and is

deposited to prohibit receipt of unacceptable wastes. In addition, random checks will be made during deposition, spreading, and covering operations to insure protection of the environment and absence of nuisances. Waste screening inspections will be made by trained personnel; operational inspections will be made by supervisory landfill personnel.

Compliance inspections will be conducted quarterly to assess the integrity of cover, the condition of side slopes and vegetative cover, and the impacts of erosion. In addition, the detailed annual inspection will include a review to verify compliance with all permit conditions and state and federal regulations. All inspection records will be kept at the Antimony Town Office for a minimum of 3 years.

FIRE / EXPLOSION CONTINGENCY PLAN

In the event of a fire or an explosion that prohibits deposition of incoming waste, the landfill will be closed, and incoming waste will be diverted to an alternate facility. Alternate facilities may include other permitted Class IV b landfills in the area, the John's Valley Landfill, the Wayne County Landfill, the Long Valley Landfill, or other future landfill facilities. Upon resolution of the unexpected event, the facility will be reopened.

CORRECTIVE ACTION FOR CONTAMINATED GROUNDWATER

This section describes corrective actions to be taken by owners and operators of the Antimony Class IVb Landfill to regain compliance with protective levels of the permit in the event releases are discovered and acceptable concentration limits for groundwater are exceeded. No monitoring wells are proposed for the Antimony Class IVb Landfill. However, if the concentrations of parameters in down gradient wells exceed the acceptable concentration limits as substantiated by confirmatory analyses, owners and operators of the Antimony Class IVb Landfill will implement a corrective action program as outlined in Rule 315-308.

CONTINGENCY PLAN FOR OTHER RELEASES

This section describes corrective actions to be taken by the Antimony Class IV Landfill to regain compliance with the protection levels of the permit in the event releases are discovered and acceptable concentration limits are exceeded.

When the concentration of parameters exceeds acceptable limits as substantiated by confirmatory analyses, owners and operators of the Antimony Class IVb Landfill will implement a corrective action program approved by the Executive Secretary.

EQUIPMENT MAINTENANCE

Active collection systems for leachate and/or explosive gases are not proposed for the Antimony Class IVb Landfill. Therefore, no maintenance will be required for these items. Maintenance of the equipment used in day to day operations will be performed by landfill employees or contracted mechanics in accordance with manufacturer recommendations and industry practices.

EXCLUSION OF HAZARDOUS WASTE

As a rural Class IVb Landfill, the Antimony facility is in a favorable position regarding exclusion of hazardous waste. Generally, all waste will be delivered by local, known generators and the waste will be observed as it is deposited. During periods the landfill is open to the public, at least one percent of the vehicles and other suspicious loads will be directed to dispose of their material near the working face in a manner that permits inspection. The waste generator will be detained while the load is inspected; if unacceptable hazardous substances are encountered, appropriate authorities will be contacted. Considering the population served, waste volumes generated, and complexity of the solid waste stream, these measures are considered to be adequate.

A section documenting the results of the formal inspections outlined above has been included as part of the daily record forms (Exhibits 8 & 9). Including hazardous/PCB waste records on the daily record forms will allow landfill manger to incorporate inspections into their daily routine and will permit regulators to review inspection patterns efficiently while examining waste volumes.

DISEASE VECTOR CONTROL

The waste accepted at a Class IVB Landfill should not attract possible disease vector animals. The primary method for disease vector control at the Antimony Class IVb Landfill will be limiting wastes to those types approved by the permit and providing an appropriate cover as needed to prevent fires. The cover consists of a 6-inch minimum layer of earthen material over dead animals or an alternate cover approved by the Secretary.

Rodents and other vermin will not be permitted to burrow in the active area of the landfill; and trapping or extinction methods will be implemented to protect the integrity of the disease vector control program.

ALTERNATIVE DISPOSAL

Alternative waste handling procedures for periods when the landfill is not in operation will be similar to procedures for fires and explosions. Waste will be diverted to alternate disposal sites. Alternate facilities may include other permitted Class IVb Landfills in the area; the John's Valley Landfill, the Wayne County Landfill, the Sevier County Landfill or other future landfills. Procedures will continue in this manner until operations at the landfill can return to normal.