

### 3. General Information

Contract Environmental Services, Inc. (CESI) currently operates a 160 acre Asbestos and Construction/Demolition Landfill (**Permit Number 0405R2**) and Oilfield Exploration & Production Waste Soil Landfarm Facility in Northeast Quarter, Section 18, Township 39 South, Range 26 East, San Juan County, Utah. CESI is currently permitted for Class V landfill through the Division of Waste Management and Radiation Control (DWMRC) since 2005. (Renewed in 2010 and Modification approved in 2016) The facility was also opened since 1999 and is permitted for landfarm through the State of Utah, Division of Oil, Gas and Mining (DOGGM). The landfarm five year renewal had also approved in 2018. Additionally, CESI is permitted from the DWMRC to accept underground storage tank waste soil for recycling in 2004 that are used as cover material for the Asbestos and C/D Landfill. (Attachment A: Other Existing Permits)

The facility is currently permitted and operating to accept Asbestos debris, C/D debris, Oilfield Waste, and UST Waste Soil in this 160 acre property through DWMRC and DOGM. Property is built and maintained through the previous approved permits including following features;

- 1) A four foot dike around the perimeter
- 2) Barbwire fence around the perimeter
- 3) Locked gates at the entrance
- 4) Controlled access – one point
- 5) Sign with operators name and emergency phone number
- 6) Sparsely populated area – no one located within one mile
- 7) Estimated 1,100' to groundwater
- 8) Relatively flat property with only grazing on adjacent property
- 9) Clay sand natural barrier to leaching
- 10) Not visible from highway
- 11) Maintained road leading to the facility from pavement
- 12) Internal road system
- 13) Privately owned property
- 14) Managed and operated by an environmental consulting firm
- 15) Approved for operation since 1999
- 16) Bonds in place – financial assurance active
- 17) Record keeping history – manifests and others

The permitted property (160 acres) still has plenty of room for the operation. For the past 14 years, CESI has filled approximately 7.5 acres in the east 80 acres and, yet, no E&P or UST Waste Soil has been placed on the entire west 80 acres of 160 permitted acres.

The nearest small community is Aneth, Utah to the south some 20 miles, Montezuma Creek and White Mesa communities are located to the southwest some 30 miles from the Landfill site. The nearest sizeable community with standard services, is Blanding, Utah at 38 miles and Cortez, Colorado to the east and south at 41 miles.

The Landfill and Landfarm operators are trained appropriately well in Asbestos. Also, the manager is trained in asbestos to include certificates in Asbestos Inspection, Asbestos Management Planner, Asbestos Contractor / Supervisor, Hazardous Waste Operations and Emergency Response and others. (Attachment B: Accreditation / Registrations and Certifications)

Within the remediated sections of the Landfarm, CESI has excavated approximately 7.5 acres of the working face of the asbestos and 2 acres of C/D landfill in section (cell) number 9, 10, 11, and 15 with the depth of approximately 10' for the Asbestos and C/D debris to be deposited. The cell number 8, 9, and 16 was approved to utilize in the Modification in 2016. CESI has been applying minimum of 6" up to 12" of soil to cover all plastic bags of asbestos within 24 hours and C/D debris within 30 days that were deposited in the sections. Furthermore, CESI has been putting another 24" of soil on the cell number 10 and 11 for the closure and started to utilize the modification cell #9 in 2018 after modification approval in 2016. Seeding and watering would be completed until a crop is sufficiently established in each section.

CESI landfill manifests have been completed and maintained as loads arrived at the landfill. All the record has been filed and kept in the main office of CESI located in 925 S. Broadway, Suite 251, Cortez, CO 81321. Quarterly report has been reported to DWMRC with fee payments every 3 months as well as annual reports every year. (Attachment C: CESI Waste Manifests)

CESI has been operating the facility Monday through Friday 8:00am to 5:00pm and closed on weekends and holidays. CESI has at least one employee during the operation hours and additional employee for safety and assistance matters with no installed equipment on site. Each employee has cellular phone services for communication and emergency contacts.

The price charged continues to be based on \$30.00 per cubic yard for the asbestos waste and \$15.00 for the C/D waste which calculated based on the containers that are delivered to the facility.

CESI has submitted five Asbestos Surveys in the Four Corners area as evidence of proven market at the initial permit application in 2004. Additionally, we are currently in process of Asbestos Abatement

projects for Montezuma County including Cortez Schools, Durango, Pagosa Springs, Navajo Reservation including Navajo Housing Authority, Grand Junction, Shiprock, Kayenta, Tuba City, Many Farms, Montrose, and several others as well as many other customers around the four corners area. It continues to appear that there is a great need for this type of facility in the Four Corners area to benefit public that includes less transportation spending to remove asbestos from the environment. Furthermore, CESI continues to benefit to place asbestos-containing materials removed from the populated areas to a remote, isolated area. For additional benefit, CESI continues to create more job opportunities in the area.

CESI has operated the Oil & Gas Landfarm since 1999 and Class V Landfill since 2005. During these years, CESI has not received any Notice of Violation or warnings or adverse observation from DOGM nor DWMRC staff. The permitted facility has been inspected several times visually each year by DOGM staff and a few times by DWMRC staff in the past. (Attachment D: Inspection Reports) CESI has put effort to improve each inspection and will continue to improve the facility and operations. In addition, CESI has excellent documentations and record keeping during operations. CESI will continue to put our best effort to upgrade our quality of operations in the future.

### **R315-302. Solid Waste Facility Location Standards, General Facility Requirements, and Closure Requirements**

It is more than 5,000 feet to Hovenweep Monument from the permitted landfill facility. There are no known natural areas, wildlife management areas or habitat for threatened or endangered species designated to the Endangered Species Act of 1982. There is no “prime or unique” farmland in the immediate area considered by the US Department of Agriculture Soil Conservation Services. The surrounding area is primarily grazing. It is more than one mile to any existing permanent dwellings in any direction. There are no schools, churches, nor other incompatible structures in the area. There are no historic structures within the State or National Register within one mile. It is more than 30 miles to the nearest airport from the permitted landfill. There are no archeological sites that would violate section 9-8-404.

It is more than a mile from the most eastern portion of the permitted property to Hovenweep Monument to the east. The permitted property starts at this point and moves further westward from the monument. The furthest point of the permitted property is more than 1.5 miles from the Hovenweep Monument. There is no state and county parks, recreation areas, wilderness nor wilderness study areas; nor wild and scenic areas within this same 1,000’ range of the permitted property. Adjacent areas are grazing with sagebrush and native grasses.

There are no existing permanent dwellings, residential areas, school nor churches within a ¼ mile of the permitted property. There are no historic structures listed within the state or National Register of Historic Places within a ¼ mile of the permitted property.

There is no airport within 10,000' of the permitted property. There are no archaeological sites of significance within a ¼ mile of the permitted property.

The permitted property is not a part of subsidence area, a dam failure flood area, above an underground mine, salt dome, above a salt bed nor other geologic structure that could compromise the structural integrity of the facility. There are no known faults in the area of the permitted facility. The facility is not located in seismic impact zone or unstable area.

The permitted property is not located in public land. The permitted property is not in a location that could cause contamination to a lake, reservoir or pond. The existing property is not a floodplain or wetlands. It is currently designed and constructed to prevent run-on and run-off waters by means of continuous 4' dike around the original permitted acres.

Depth to groundwater at the permitted property is estimated at 1,100' below ground level. CESI is not required to install a liner for the landfill cells in previous permits. The clay-sand is such a fine-grained material it forms an impermeable layer that would cause auger refusal. CESI has claimed and permitted from groundwater monitoring for the permitted property in reference to R315-302-1-2 at the end where it states "where there is a natural impermeable barrier above groundwater, or where there is no groundwater; Executive Secretary may exempt the disposal site, on a site specific basis, from some design criteria and groundwater monitoring."

### **R315-302-2. General Facility Requirements**

The landfill is for Asbestos and C/D waste only. The CESI facility does not receive any hazardous materials, dead animals nor PCBs. Materials are visually inspected prior to the disposals.

CESI does not accept any building material that is not known to contain asbestos unless it is affixed to Asbestos-Containing Building Materials that were inseparable in asbestos landfill cells.

C/D waste with no hazardous material is accepted in the separate cell.

At least one employee will be on site during hours of operation and shall prevent unauthorized disposal by controlling entry by use of barrier berm and locked gate. When the facility is closed, CESI will guarantee security with a lockable gate and barrier.

The minimum size of working face of the asbestos landfill cell will be fifty (50') feet. The length of the cell is continuous and may cross landfarm cells as needed. Emission is prevented by having a water tank and pressured water to expel on any load that emits emissions. However, since the waste arriving should be double-bagged and the container is also be lined with plastic, no emissions should be observed.

The facility has a dust control plan was submitted with the approval order by the State of Utah, Division of Air Quality. Free liquids are not expected at the CESI facility with the exception of the water and wetting agents are applied to the asbestos as it is being removed. We do not however expect large amount of liquids. There should be not scattered litter associated with properly disposed asbestos building materials. When property contained, all asbestos building materials are surrounded by two poly bags to hold the waste. No scavenging will be allowed anytime. Each day, asbestos containing building materials are covered with a minimum of 6" to 12" of soil prior to leaving the facility.

When the facility is ready for closing, the landfill cells previously dug approximately 10' deep will be leveled to extent practicable and the waste shall be covered with minimum of two (2') feet of soil

including six inches of top soil. Contouring the surface and seeding with grass will be accomplished, or use of other vegetation approved by the State of Utah to minimize erosion. CESI will periodically check status of the cover material and cover corp.

The submitted plan of operation was approved by the State of Utah on June 25<sup>th</sup>, 2004 for the Recycled Soil. CESI has reported annual report and quarterly report that include quantities in cubic yards of asbestos debris and C/D debris with appropriate fee payments. Site inspection records have been kept at the facility, as well.

CESI landfill manifest has been completed and maintained as loads arrived at the landfill. No materials are received without waste manifests. Daily activity reports are kept for 6 months at the landfill site for additional record. All the record has been filed and kept in the main office of CESI located in 925 S. Broadway, Suite 251, Cortez, CO 81321. Quarterly report has been reported to DWMRC with fee payments every 3 months as well as annual reports every year. (Attachment C: CESI Waste Manifests)

The site inspections cover soil conditions overlying debris affected by wind, water, or rodents. Also they would cover water visible at working face of landfill. Other details are inspected as well. (Attachment D: Landfill Site Inspection Form)

With asbestos, there are no explosive gas emissions. CESI has not and will not cause violation to ambient air quality on the property due to landfill gases, combustion or other emissions. In addition,

#### **R315-303-4. Standards for Maintenance and Operation**

CESI continues to make effort to control fugitive dust generated from roads, construction and general operation. CESI continues to collect scattered litter as necessary. No scavenging will be allowed. Landfill personnel will be trained in asbestos waste will be on site during the operation hours.

Daily cover of minimum 6" up to 12" of soil will be placed within 24 hours of receipt for asbestos waste and within 30 days of receipt for C/D waste. The daily cover material may be remediated oil & gas,

remediated UST soil or virgin soil from the property as needed. Testing will be completed to assure that remediated soil primarily is used. No recyclable containers will be placed at the facility for other wastes.

All loads will be inspected prior to placing in the landfill cell for disposal. Unacceptable loads will be rendered acceptable or returned to the sender.

#### **R315-315.**

##### Asbestos and Construction / Demolition Waste

CESI will continue to handle and dispose of Asbestos Waste and C/D Waste in manner that will not permit the release of asbestos fibers into the air. Friable asbestos waste will only be accepted if property containerized and adequately wet upon arrival. If the waste is not properly containerized, CESI will refuse the load or thoroughly soak the load with a water spray prior to unloading. Waste received that is not properly containerized will immediately be covered with soil.