



State of Utah

GARY R. HERBERT
Governor

SPENCER J. COX
Lieutenant Governor

Department of
Environmental Quality

Alan Matheson
Executive Director

DIVISION OF WASTE MANAGEMENT
AND RADIATION CONTROL
Scott T. Anderson
Director

May 3, 2018

Jon Finlinson
President and Chief Operations Officer
Intermountain Power Service Corporation
850 Brush Wellman Road
Delta, Utah 84624

RE: Intermountain Generating Facility Class IIIb Sanitary Landfill Permit

Dear Mr. Finlinson:

Enclosed is the approved permit for the Intermountain Generating Facility Class IIIb Sanitary Landfill. The public comment period for the permit ended on April 9, 2018. No comments were received.

Periodic inspections of the landfill will be conducted by representatives of the Division of Waste Management and Radiation Control and the Central Utah Public Health Department to assess compliance with permit conditions and applicable Solid Waste Rules.

If you have any questions, please call Matt Sullivan at (801) 536-0241.

Sincerely,

Scott T. Anderson, Director
Division of Waste Management and Radiation Control

STA/MBS/kl

Enclosure: Permit (DSHW-2017-004846)

c: Sue Hilderbrand, MSN, Health Officer, Central Utah Public Health Dept.
Nathan Selin, Environmental Health Director, Central Utah Public Health Dept.
John Chartier, P.E., DEQ District Engineer

DSHW-2018-003185

195 North 1950 West • Salt Lake City, UT
Mailing Address: P.O. Box 144880 • Salt Lake City, UT 84114-4880
Telephone (801) 536-0200 • Fax (801) 536-0222 • T.D.D. (801) 536-4284
www.deq.utah.gov
Printed on 100% recycled paper

DIVISION OF WASTE MANAGEMENT
AND RADIATION CONTROL
SOLID WASTE LANDFILL PERMIT

Intermountain Generating Facility Class IIIb Sanitary Landfill

Pursuant to *Utah Solid and Hazardous Waste Act*, Title 19, Chapter 6, Part 1, Utah Code Annotated (Utah Code Ann.) (the Act) and the *Utah Solid Waste Permitting and Management Rules*, Utah Administrative Code R315-301 through 320 adopted thereunder, a Permit is issued to

Intermountain Power Agency as owner and
Intermountain Power Service Corporation as operator
(Permittees),

to own and operate the Class IIIb landfill located in of Section 13, Township 15 South, Range 7 West, Salt Lake Base and Meridian, Millard County, Utah as shown in the Permit Renewal Application that was determined complete on February 28, 1018.

The Permittees are subject to the requirements of R315-301 through 320 of the Utah Administrative Code and the requirements set forth herein.

All references to R315-301 through 320 of the Utah Administrative Code are to regulations that are in effect on the date that this permit becomes effective.

This Permit shall become effective April 23, 2018.

This Permit shall expire at midnight April 22, 2028.

Closure Cost Revision Date: April 23, 2023.

Signed this 3rd day of May, 2018.



Scott T. Anderson, Director
Utah Division of Waste Management and Radiation Control

FACILITY OWNER/OPERATOR INFORMATION

LANDFILL NAME: Intermountain Generating Facility Class IIIb Sanitary Landfill

OWNER NAME: Intermountain Power Agency

OWNER ADDRESS: 10653 South River Front Parkway, Suite 120
South Jordan, Utah 84095

OWNER PHONE NO.: (801) 938-1333

OPERATOR NAME: Intermountain Power Service Corporation

OPERATOR ADDRESS: 850 West Brush Wellman Road
Delta, Utah 84624

OPERATOR PHONE NO.: (801) 864-4414

TYPE OF PERMIT: Class III Landfill

PERMIT NUMBER: 9103R4

LOCATION: Landfill site is located in Township 15 South, Range 7 West, Section 13, SLMB; Millard County.
850 West Brush Wellman Road, 6 miles west of the Brush Wellman (SR 174) and U.S. HWY 6 Junction.

PERMIT HISTORY Permit renewal signed: May 3, 2018

The term, "Permit," as used in this document is defined in R315-301-2(55) of the Utah Administrative Code. The term, "Director," as used throughout this permit, refers to the Director of the Division of Waste Management and Radiation Control.

Attachments to this permit are hereby incorporated into this Solid Waste Permit. All representations made in the attachments are part of this Permit and are enforceable under R315-301-5(2) of the Utah Administrative Code. Where differences in wording exist between this Permit and the attachments, the wording of this Permit supersedes that of the attachments.

Compliance with this Permit does not constitute a defense to actions brought under any other local, state, or federal laws. This Permit does not exempt the Permittees from obtaining any other local, state or federal permits or approvals required for the facility operation.

The issuance of this Permit does not convey any property rights, other than the rights inherent in this Permit, in either real or personal property, or any exclusive privileges other than those inherent in this Permit. Nor does this Permit authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations, including zoning ordinances.

The provisions of this Permit are severable. If any provision of this Permit is held invalid for any reason, the remaining provisions shall remain in full force and effect. If the application of any provision of this Permit to any circumstance is held invalid, its application to other circumstances shall not be affected.

By this Permit, the Permittees are subject to the following conditions.

PERMIT REQUIREMENTS

I. GENERAL COMPLIANCE RESPONSIBILITIES

I.A. General Operation

I.A.1. The Permittees shall operate the landfill in accordance with all applicable requirements of R315-304 of the Utah Administrative Code, that are in effect as of the date of this Permit unless otherwise noted in this Permit. Any permit noncompliance or noncompliance with any applicable portions of Utah Code Ann. § 19-6-101 through 125 and applicable portions of R315-301 through 320 of the Utah Administrative Code constitutes a violation of the Permit or applicable statute or rule and is grounds for appropriate enforcement action, permit revocation, modification, or denial of a permit renewal application.

I.B. Acceptable Waste

I.B.1. This Permit is for disposal of nonhazardous sanitary waste such as common refuse, miscellaneous operational wastes, and special wastes generated at the Intermountain Power Service Corporation (IPSC) site. Examples of special wastes include regulated asbestos, ash, bulky items, sludge, and dead animals as defined in R315-301-2(71) of the Utah Administrative Code.

I.C. Prohibited Waste

I.C.1. Hazardous waste as defined by R315-1 and R315-2 of the Utah Administrative Code;

I.C.2. PCB's as defined by R315-301-2(53) of the Utah Administrative Code, except PCB's specified by R315-315-7(2)(a) and (c) of the Utah Administrative Code;

I.C.3. Household waste;

I.C.4. Municipal waste;

I.C.5. Special waste except as specified in this Permit;

I.C.6. Combustion byproducts wastes (e.g., flue gas emission control wastes, fly ash, bottom ash, and scrubber sludge)

I.C.7. Commercial waste; and

I.C.8. Wastes containing free liquids.

I.C.9. Any prohibited waste received and accepted for disposal at the facility shall constitute a violation of this Permit, of Utah Code Ann. § 19-6-101 through 125 and of R315-301 through 320 of the Utah Administrative Code.

I.D. Inspections and Inspection Access

I.D.1. The Permittees shall allow the Director or an authorized representative, or representatives from the Central Utah Public Health Department, to enter at reasonable times and:

- I.D.1.a Inspect the landfill or other premises, practices or operations regulated or required under the terms and conditions of this Permit or R315-301 through 320 of the Utah Administrative Code;
- I.D.1.a.(i) Have access to and copy any records required to be kept under the terms and conditions of this Permit or R315-301 through 320 of the Utah Administrative Code;
- I.D.1.a.(ii) Inspect any loads of waste, treatment facilities or processes, pollution management facilities or processes, or control facilities or processes required under this Permit or regulated under R315-301 through 320 of the Utah Administrative Code; and
- I.D.1.a.(iii) Create a record of any inspection by photographic, video, electronic, or any other reasonable means.

I.E. Noncompliance

- I.E.1. If monitoring, inspection, or testing indicates that any permit condition or any applicable rule under R315-301 through 320 of the Utah Administrative Code may be or is being violated, the Permittee shall promptly make corrections to the operation or other activities to bring the facility into compliance with all permit conditions or rules.
- I.E.2. In the event of noncompliance with any permit condition or violation of an applicable rule, the Permittees shall promptly take any action reasonably necessary to correct the noncompliance or violation and mitigate any risk to the human health or the environment. Actions may include eliminating the activity causing the noncompliance or violation and containment of any waste or contamination using barriers or access restrictions, placing of warning signs, or permanently closing areas of the facility.
- I.E.3. The Permittees shall:
 - I.E.3.a Document the noncompliance or violation in the daily operating record, on the day the event occurred or the day it was discovered;
 - I.E.3.b Notify the Director of the Utah Division of Waste Management and Radiation Control by telephone within 24 hours, or the next business day following documentation of the event; and
 - I.E.3.c Give written notice of the noncompliance or violation and measures taken to protect human health and the environment within seven days after Director notification.

- I.E.4. Within thirty days after the documentation of the event, the Permittees shall submit to the Director a written report describing the nature and extent of the noncompliance or violation and the remedial measures taken or to be taken to protect human health and the environment and to eliminate the noncompliance or violation. Upon receipt and review of the assessment report, the Director may order the Permittee to perform appropriate remedial measures including development of a site remediation plan for approval by the Director.
- I.E.5. In an enforcement action, the Permittees may not claim as a defense that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with R315-301 through 320 of the Utah Administrative Code and this Permit.

I.F. Revocation

- I.F.1. This Permit is subject to revocation if the Permittees fails to comply with any condition of the Permit. The Director will notify the Permittees in writing prior to any proposed revocation action and such action shall be subject to all applicable hearing procedures established under R305-7 of the Utah Administrative Code and the Utah Administrative Procedures Act.

I.G. Attachment Incorporation

- I.G.1. Attachments to this Permit are incorporated by reference into this Permit and are enforceable conditions of this Permit, as are documents incorporated by reference into the attachments. Language in this Permit supersedes any conflicting language in the attachments or documents incorporated into the attachments.

II. DESIGN AND CONSTRUCTION

II.A. Design and Construction

- II.A.1. All engineering drawings submitted to the Director shall be stamped by a professional engineer with a current registration in Utah as outlined in R315-303-3(6)(a). The landfill shall be constructed according to the design outlined in Attachment 1 including landfill cells, fences, gates, and berms prior to acceptance of waste.
- II.A.2. The Permittees shall notify the Director upon completion of construction of any landfill cells or run-on and run-off diversion systems. No landfill cells or run-on and run-off diversion system may be used until construction is approved by the Director and this permit modified.
- II.A.3. The Permittees shall notify the Director of the completion of construction of any final cover system and shall provide all necessary documentation and shall apply for approval of the construction from the Director and modification of this permit.
- II.A.4. If ground water is encountered during excavation of the landfill, the Director shall be notified immediately, and an alternative construction design developed and submitted for approval.

II.B. Run-On Control

II.B.1. The Permittees shall establish a drainage and diversion system and shall maintain them at all times to effectively prevent runoff from the surrounding area from entering the landfill.

III. LANDFILL OPERATION

III.A. Operations Plan

III.A.1. The Permittees shall keep the Operations Plan included in Attachment 2 on site at the landfill or at the location designated in section III-H of this Permit. The Permittees shall operate the landfill in accordance with the operations plan. If necessary, the Permittees may modify the Operations Plan, provided that the modification meets all of the requirements of R315-301 through 320 of the Utah Administrative Code, is as protective of human health and the environment as the Operations Plan approved as part of this Permit, and is approved by the Director as a permit modification under R315-311-2(1) of the Utah Administrative Code. The Permittees shall note any modification to the Operations Plan in the daily operating record.

III.A.2. The Permittees shall submit any modification to the Operations Plan to the Director for approval.

III.B. Security

III.B.1. The Permittees shall operate the Landfill so that unauthorized entry to the facility is restricted. The Permittees shall:

III.B.1.a Lock all facility gates and other access routes if the facility is closed.

III.B.1.b Have at least one person on site employed by the Permittees at the facility during all applicable hours or times that the landfill is open.

III.B.1.c Have all fencing and any other access controls to prevent unauthorized access by persons or livestock by other routes.

III.C. Training

III.C.1. The Permittees shall provide training for on-site personnel in landfill operation, including waste load inspection, hazardous waste identification, and personal safety and protection.

III.D. Burning of Waste

III.D.1. Intentional burning of solid waste is prohibited and is a violation of R315-303-4(2)(b) of the Utah Administrative Code.

III.D.2. The permittees shall extinguish all accidental fires as soon as reasonably possible.

III.E. Cover

- III.E.1. The Permittees shall cover the waste as necessary to prevent fires and to control vectors, blowing litter, odor, scavenging, and fugitive dust. The Permittees shall cover wastes that are capable of attracting or providing food for vectors, materials that may become windblown litter or fine materials that may become fugitive dust with a minimum of six inches of earth at the end of the working day in which the wastes are received. The Permittees may use an alternative cover material when the material and operation meets the requirements of R315-303-4(4)(b) through (e) of the Utah Administrative Code.
- III.E.2. The Permittees shall use a minimum of six inches of earthen cover no less than monthly for all wastes received at the landfill. This cover shall consist of soil; no alternative may be used.
- III.E.3. The Permittees shall record in the daily operating record and the operator shall certify, at the end of each day of operation when soil or an alternative cover is placed, the amount and type of cover placed and the area receiving cover.
- III.E.4. Cover requirements for dead animals are found in Section III-L of this Permit.
- III.F. Waste Inspections
- III.F.1. The Permittees shall visually inspect incoming waste loads to verify that no wastes other than those allowed by this permit are disposed in the landfill. The Permittees shall record the type and quantity of each load of waste disposed in the landfill.
- III.F.2. The Permittees shall inspect all loads suspected or known to have one or more containers capable of holding more than five gallons of liquid to ensure that each container is empty.
- III.F.3. The Permittees shall inspect all loads that the Permittees suspect may contain a waste not allowed for disposal at the landfill.
- III.F.4. The Permittees shall conduct complete random inspections as follows:
- III.F.4.a The Permittees shall conduct the random waste inspection at the working face or an area designated by the Permittees.
- III.F.4.b The Permittees shall direct that loads subjected to complete inspection be unloaded at the designated area;
- III.F.4.c Loads shall be spread by equipment or by hand tools;
- III.F.4.d Personnel trained in hazardous waste recognition and recognition of other unacceptable waste shall conduct a visual inspection of the waste; and
- III.F.4.e Personnel conducting the inspection shall record the inspection results the inspection waste load form in Attachment 3. The Permittees shall place the form in the daily operating record at the end of the operating day.
- III.F.4.f The Permittees or the waste transporter shall properly dispose of any waste found that is not acceptable at the facility at an approved disposal site for the waste type and handle the waste according to the rules covering the waste type.

III.G. Self-Inspections

III.G.1. The Permittees shall inspect the facility to prevent malfunctions and deterioration, operator errors, and discharges that may cause or lead to the release of wastes or contaminated materials to the environment or create a threat to human health or the environment. The Permittees shall complete these general inspections, in Attachment 4, no less than quarterly and shall cover the following areas: Waste placement; compaction, cover; fences and access controls; roads; run-on/run-off controls; any final and intermediate cover; litter controls; and records. The Permittees shall place a record of the inspections in the daily operating record on the day of the inspection. The Permittee shall correct the problems identified in the inspections in a timely manner and document the corrective actions in the daily operating record.

III.H. Recordkeeping

III.H.1. The Permittees shall maintain and keep on file at the IPSC facility a daily operating record and other general records of landfill operation as required by R315-302-2(3) of the Utah Administrative Code. The landfill operator, or other designated personnel, shall date and sign the daily operating record at the end of each operating day. Each record to be kept shall contain the signature of the appropriate operator or personnel and the date signed. The Daily operating record shall consist of the following two types of documents:

III.H.1.a Records related to the daily landfill operation or periodic events including:

III.H.1.a.(i) The number of loads of waste and the weights or estimates of weights or volume of waste received each day of operation and recorded at the end of each operating day;

III.H.1.a.(ii) Major deviations from the approved plan of operation recorded at the end of the operating day the deviation occurred;

III.H.1.a.(iii) Results of monitoring required by this Permit recorded in the daily operating record on the day of the event or the day the information is received;

III.H.1.a.(iv) Records of all inspections conducted by the Permittees, results of the inspections, and corrective actions taken shall be recorded in the record on the day of the event.

III.H.1.b Records of a general nature including:

III.H.1.b.(i) A copy of this Permit, including all attachments;

III.H.1.b.(ii) Results of inspections conducted by representatives of the Director of the Division of Waste Management and Radiation Control, and of representatives of the local Health Department, when forwarded to the Permittees;

III.H.1.b.(iii) Closure and Post-closure care plans; and

III.H.1.b.(iv) Records of employee training.

III.I. Reporting

III.I.1. The Permittees shall prepare and submit to the Director an Annual Report as required by R315-302-2(4) of the Utah Administrative Code. The Annual Report shall include: the period covered by the report, the annual quantity of waste received, an annual update of the financial assurance mechanism, and all training programs completed.

III.J. Roads

III.J.1. The Permittees shall improve and maintain as necessary to assure safe and reliable all-weather access to the disposal area.

III.K. Litter Control

III.K.1. Litter resulting from operations of the landfill shall be minimized. In addition to the litter control plans found in Attachment 2, the Permittees shall implement the following procedures when high wind conditions are present:

III.K.1.a Reduce the size of the tipping face;

III.K.1.b Reduce the number of vehicles allowed to discharge at the tipping face at one time;

III.K.1.c Orient vehicles to reduce wind effects on unloading and waste compaction;

III.K.1.d Reconfigure tipping face to reduce wind effect;

III.K.1.e Use portable and permanent wind fencing as needed; and

III.K.1.f Should high winds present a situation that the windblown litter cannot be controlled, the Permittees shall cease operations of the landfill until the winds diminish.

III.L. Disposal of Special Wastes

III.L.1. The Permittees may dispose of animal carcasses in the landfill working face and shall cover them with other solid waste or earth by the end of the operating day in which the carcasses are received. Alternatively, the Permittees may dispose of animal carcasses in a special trench or pit prepared for the acceptance of dead animals. If a special trench is used, the Permittees shall cover animals placed in the trench with six inches of earth by the end of each operating day.

III.L.2. The Permittees shall handle and dispose of asbestos waste in accordance with R315-315-2 of the Utah Administrative Code.

III.L.3. If a load of incinerator ash is accepted for disposal, the Permittees shall transport it to the place of disposal in such a manner as to prevent leakage or the release of fugitive dust. The Permittees shall completely cover the ash with a minimum of six inches of material, or the Permittees shall use other methods or material, if necessary, to control fugitive dust. The Permittees may use ash for daily cover when its use does not create a human health or environmental hazard.

IV. CLOSURE REQUIREMENTS

IV.A. Closure

IV.A.1. The final cover shall meet, at a minimum, the standard design for closure as specified in R315-305-5(5)(b) of the Utah Administrative Code. A final inspection shall be arranged and conducted by representatives of the Director of the Division of Waste Management and Radiation Control as specified in R315-310-4(2)(d).

IV.B. Title Recording

IV.B.1. The Permittees shall meet the requirements of R315-302-2(6) of the Utah Administrative Code by recording a notice with the Millard County Recorder as part of the record of title that the property has been used as a landfill. The notice shall include waste disposal locations and types of waste disposed. The Permittees shall provide the Director the notice as recorded.

IV.C. Post-Closure Care

IV.C.1. The Permittees shall perform post-closure care at the closed landfill in accordance with the Post-Closure Care Plan contained in the Permit Application. Post-closure care shall continue until all waste disposal sites at the landfill have stabilized and the finding of R315-302-3(7)(c) of the Utah Administrative Code is made.

IV.D. Financial Assurance

IV.D.1. The Permittees shall keep in effect and active the currently approved financial assurance mechanism or another approved mechanism that meets the requirements of R315-309 of the Utah Administrative Code and is approved by the Director to cover the costs of closure and post-closure care at the landfill. The Permittees shall adequately fund and maintain the financial assurance mechanism to provide for the cost of closure at any stage or phase or anytime during the life of the landfill or the permit life, whichever is shorter (include the following for a trust fund), and the Permittees shall fully fund the trust fund within ten years of the date waste is first received at the landfill.

IV.D.2. With each annual revision of the closure and post-closure care cost estimate, the Permittee/s shall determine the annual payments to be made to the trust fund by the following formula:

$$NP=[CE-CV]/Y$$

where NP is the next payment, CE is the current cost estimate for closure and post-closure care (updated for inflation or other changes), CV is the current value of the trust fund, and Y is the number of years remaining in the pay-in period.

IV.E. Financial Assurance Annual Update

IV.E.1. The Permittees shall submit an annual revision of closure and post-closure costs for inflation and financial assurance funding as required by R315-309-2(2) of the Utah Administrative Code, to the Director as part of the annual report.

IV.F. Closure Cost and Post-Closure Cost Revision

IV.F.1. The Permittees shall submit a complete revision of the closure and post-closure cost estimates by the Closure Cost Revision Date listed on the signature page of this Permit and any time the facility is expanded, any time a new cell is constructed, or any time a cell is expanded.

V. ADMINISTRATIVE REQUIREMENTS

V.A. Permit Modification

V.A.1. Modifications to this Permit may be made upon application by the Permittees or by the Director following the procedures specified in R315-310-11-2 of the Utah Administrative Code. The Permittees shall be given written notice of any permit modification initiated by the Director.

V.A.2. Permit Transfer

V.A.2.a This Permit may be transferred to a new permittee or new permittees by complying with the permit transfer provisions specified in R315-310-11 of the Utah Administrative Code.

V.B. Expansion

V.B.1. This Permit is for the operation of a Class IIIb landfill according to the design and Operation Plan described and explained in the Permit Application. Any expansion of the current footprint designated in the description contained in the Permit Application, but within the property boundaries designated in the Permit Application, shall require submittal of plans and specifications to the Director. The plans and specifications shall be approved by the Director prior to construction.

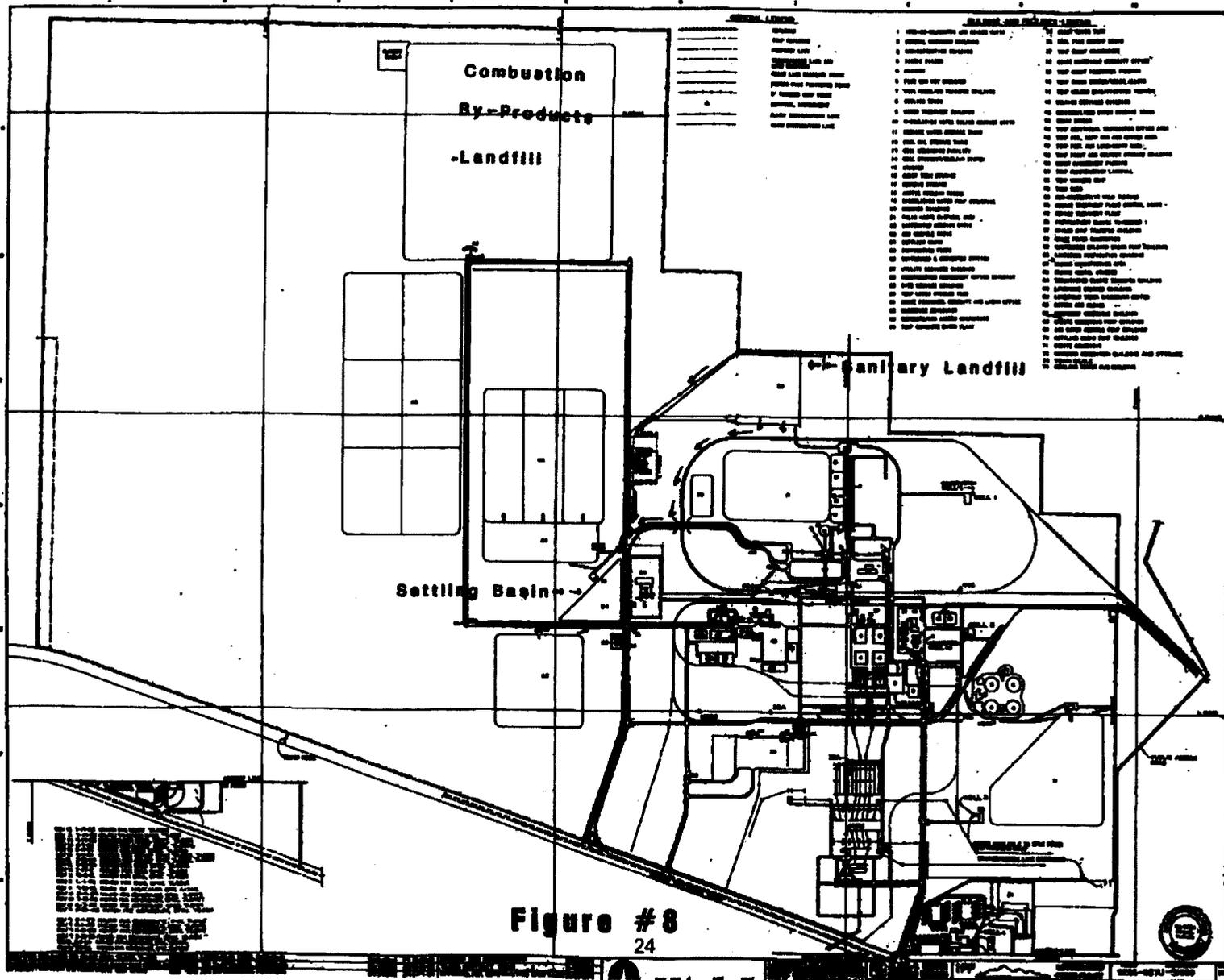
V.B.2. Any expansion of the landfill facility beyond the property boundaries designated in the description contained in the Permit Application shall require submittal of a new Permit Application in accordance with the requirements of R315-310 of the Utah Administrative Code.

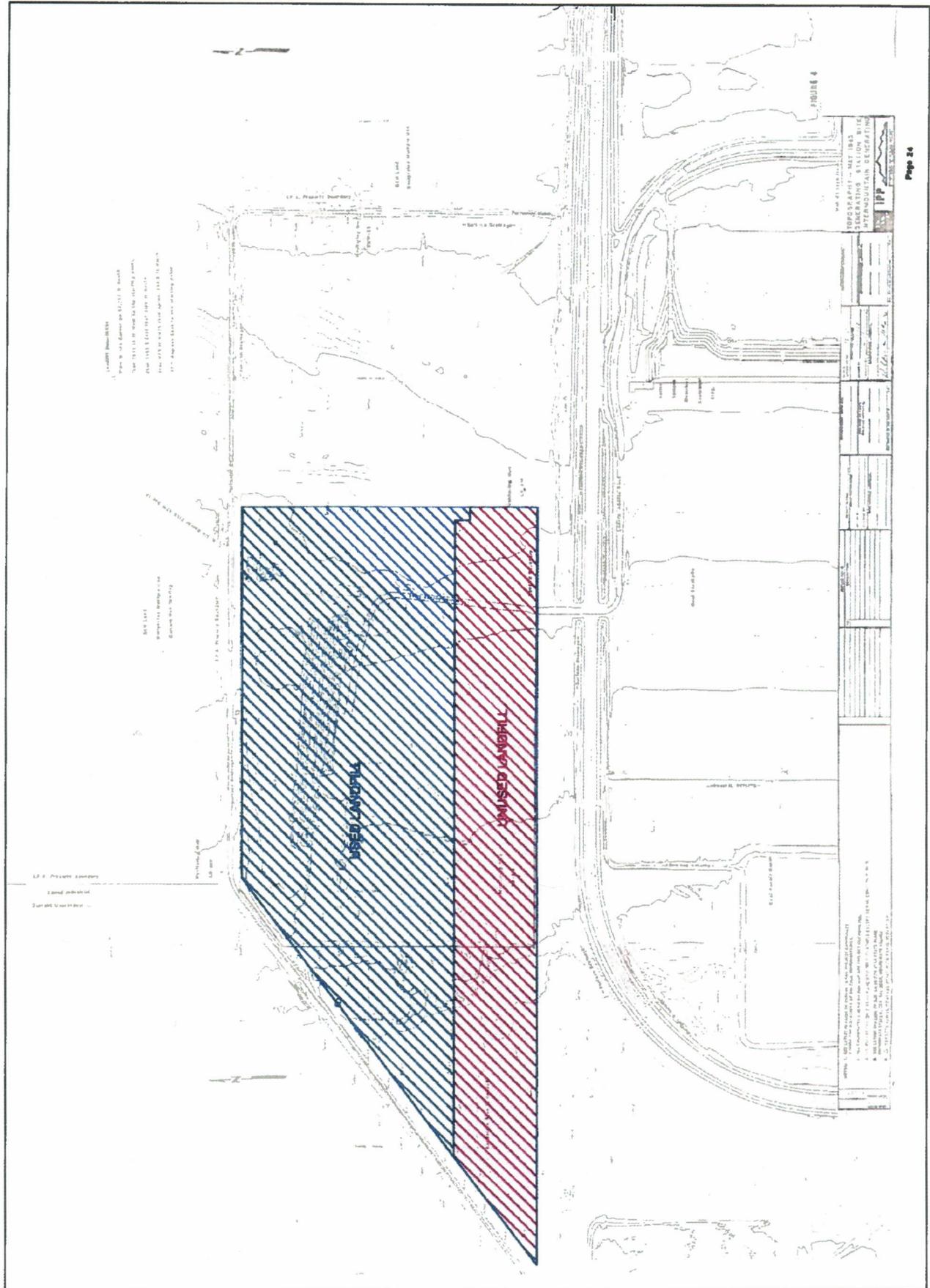
V.B.3. Any addition to the list of acceptable waste in Section I-B shall require submittal of all necessary information to the Director and the approval of the Director.

V.C. Expiration

V.C.1. If the Permittees desire to continue operating this landfill after the expiration date of this Permit, the Permittees shall submit an application for permit renewal at least six months prior to the expiration date, as shown on the signature (cover) page of this Permit. If the Permittees timely submit a permit renewal application and the permit renewal is not complete by the expiration date, this Permit shall continue in force until renewal is completed or denied.

Attachment 1





LEGEND

SCALE - 1 SQ. IN. = 1 AC
 SCALE - 1" = 209'



EXISTING FENCE LINE

RESERVED AREA SEE FIG 6

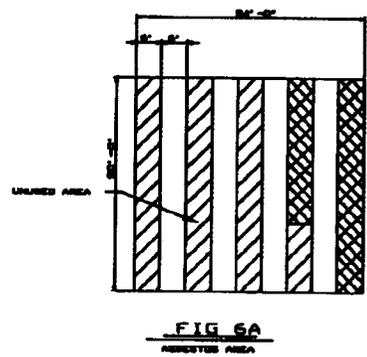
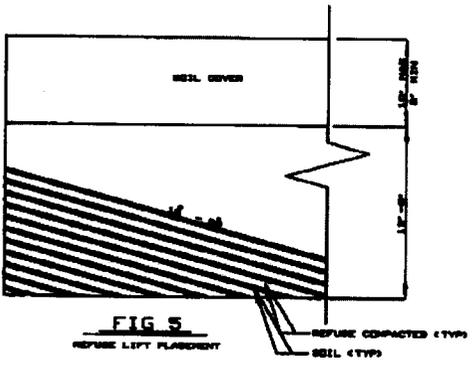
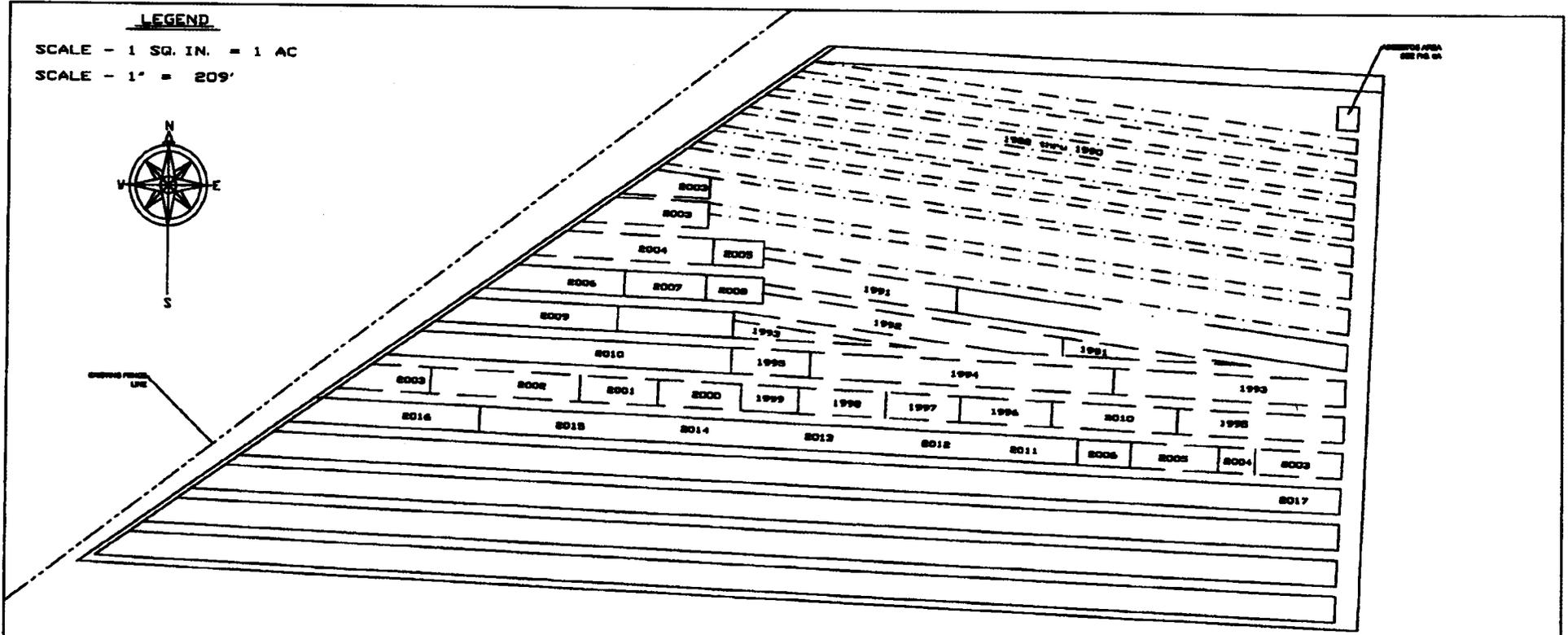


FIG 6
LANDFILL LAYOUT

DRAWING TITLE LAND FILL REFUSE CELLS		IPP INTERMOUNTAIN POWER SERVICE CORPORATION	
REF. DWS		BRUSH MELLMAN ROAD DELTA, UTAH	
NO.	DATE	BY	REVISION
DRAWN BY		DATE	CHK'D
91-09516-00		01-08-10	
DATE			SHT. NO.

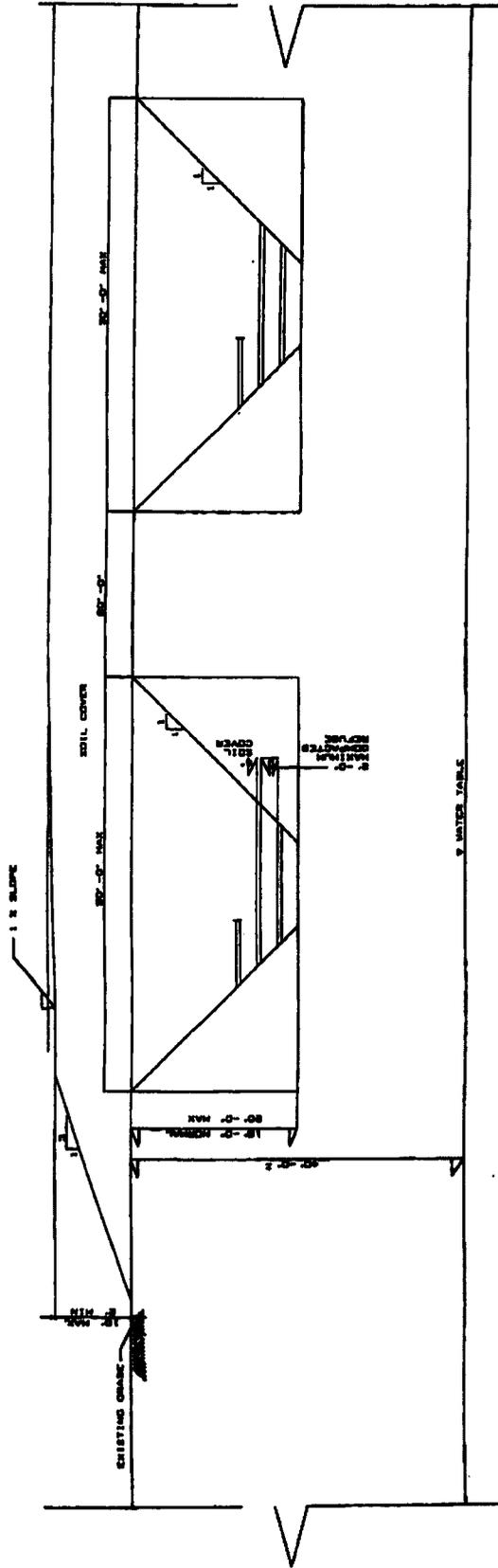


FIG 3

DRAWING TITLE		IPP	
LAND FILL REFUSE CELLS		INTERMOUNTAIN POWER SERVICE CORPORATION	
REF. SHEET		BRUSH MULLMAN ROAD DELTA, UTAH	
NO.	DATE BY	DESIGNED BY	CHECKED BY
		10/21/2011	
REVISION		DATE	
		SHEET NO.	
		21	

Attachment 2

7.0 OPERATION PLAN

A 52-acre tract of land in the generating station is dedicated and serves as the landfill. This landfill is an industrial Class IIIb landfill.

7.1 Purpose

The purpose of this operation plan is to define the methods and criteria under which the landfill will be operated. It is further anticipated that the plan will also serve as the basis of permit approval by the Utah Department of Environmental Quality, Division of Waste Management and Radiation Control.

7.2 Responsible Parties

7.2.1 IPSC President & Chief Operations Officer

The IPSC President & Chief Operations Officer (Plant Manager) is in charge of all operations at the IPP. The Plant Manager is ultimately responsible for operation of the landfill and may further assign this duty to other employees under his direct or indirect supervision. Under his direction, records are kept of the amount of solid waste accepted in the landfill. At the present time, the persons assigned to keep these records are the Operations Yard Supervisor and the Environmental Engineer.

7.2.2 Division of Waste Management and Radiation Control

The Utah Department of Environmental Quality, Division of Waste Management and Radiation Control is the permitting agency at the State level. Approval to operate the landfill will be obtained from this agency by IPSC. Approval will be conditional and dependent on adherence to the conditions of the operating plan.

7.2.3 Other Agencies

Permission to operate the landfill from the Millard County Planning and Zoning Commission has been obtained by IPA in the Conditional Use Permit granted by said commission for IPP on January 5, 1980. In accordance with the Conditional Use Permit, IPA submitted a copy of the Operation Plan and monitoring and compliance reports to the County Planning and Zoning Commission.

7.3 Site

7.3.1 Site Security and Access

The landfill is located within a portion of the IPP plant site which is enclosed by an eight foot high chain link fence topped with a one foot extension of three barbed wire strands. A perimeter road has been constructed parallel to the inside face of this security fence to allow for

patrol, inspection, and repair of the fencing. The landfill section for waste disposal has been set back a minimum of 35 feet from the security fence on the north limit of the landfill.

Access to the landfill is provided by a graded gravel all-weather road that is connected to the internal road system of the plant. The plant site entry to the landfill is controlled by the security guard stations which screen entrance to the plant by outside entities.

7.3.2 Site Preparation

Site preparation will include the clearing of vegetation, grading of internal access roads, placing of earthen berms and slopes around the landfill trenches, and the stripping and stockpiling of cover soils. These activities will be done only as necessary for each phase of operation and prior to any landfilling operation. Clearing of vegetation will be done only in areas needed for the disposal trenches and access to the trenches. The cleared vegetation will be incorporated in the cover soil stockpile or in covering of the previous cell of the landfill.

7.3.3 Phasing of Work

Excavation and clearing shall be planned and phased such that a maximum of about three acres of land are disturbed at any one time. During excavation, the topsoil will be stockpiled so that it can be used for final cover of that section or used immediately on the previous section. Some of the excavated earth shall be used to form a berm or slope around the open work area to prevent surface runoff from either entering into or discharging from the landfill trenches. Each open trench area will be completely filled to the original grade before placing any refuse in a new disposal trench. When finishing an old trench, the new trench will be started before completing the old trench. This assures trench space is always available.

7.3.4 Earth Moving Equipment

Tractors, trucks, compactors, and backhoes will be available to evacuate and clear the land for the landfill. Equipment such as crawler dozers, rubber-tired dozers, scrapers, water trucks, and similar equipment may also be used in the landfill operations.

7.3.5 Fire Control at the Landfill

Open burning or any other burning of refuse at the landfill is prohibited. In the event there is a fire involving the landfill at Intermountain Power Facility, the appropriate response will include all or parts of the following:

Reporting to the 24 hour manned control rooms by phone or radio, dispatching of command level supervisors to size-up the situation and request resources, dispatching of the onsite structural level fire brigade with the appropriate equipment, dispatch of the IPP fire truck which is rated at 1,000 gpm with 500 gallons of water, using the AFFF Foam

Wagon with monitor nozzle, and by using other heavy equipment as needed.

Because of the size and location of the IPP landfill, it is planned to deal with fires at the landfill in-house as much as possible; however, a mutual aid agreement is in place with the Delta City Fire Department to respond upon request.

7.4 Daily Operations

Landfill refuse will be collected as required from metal containers (dumpsters) placed at strategic locations on the plant site. Filled dumpsters are transported to the landfill, being careful to avoid littering during transport. Transport will typically occur once to twice per week.

At the landfill site, the refuse will be compacted in layers to maximum layer thickness of 24 inches. IPSC will cover the refuse monthly, at a minimum. Should the refuse or weather conditions show a windblown problem exists, the refuse will then be covered as needed. All appropriate aspects of the design criteria as previously set forth will be strictly maintained during daily operations.

The landfill will be kept as clean as possible at all times. The landfill and surrounding areas will be inspected, at a minimum, semi-annually or as needed to help control windblown litter. If inspections show a need, the landfill will be policed to pick up the windblown litter.

Dust-control measures will be taken to limit fugitive dust from the landfill as needed. These dust-control measures may include sprinkling water on exposed soils, moistening of soil being worked during excavation, grading and filling operations, and use of water or dust-control palliatives on access roads. Roads may be covered with other roadbase materials such as limestone chips to reduce fugitive dust.

Rodent and insect control will primarily be accomplished by covering the refuse. This will prevent access by insects and rodents. Refuse could be covered more frequently should a problem exist. Should an insect or rodent problem continue, a pest control contractor will be on call. The area will be sloped to prevent standing water—with less than 8 inches of annual rainfall, this should not normally be a problem.

During hours of operation of the landfill, all employees working at the landfill will be under the direct supervision of an Operations Supervisor (Yard Supervisor). The employees working at the landfill are normally the heavy equipment operators who dig and backfill the trenches and haul refuse to the landfill.

The Operations Supervisor will supply information to the Environmental Group so records of quantity of refuse in the landfill can be maintained. Refuse quantity will be determined by weighing the refuse and by measuring the length of the filled trenches.

The Environmental Group will survey the landfill to locate any new trenches to assure proper placement. The Environmental Group will also record the volume

or weight of refuse placed in the landfill for each calendar year and will update and submit any application to the State for permit renewal.

7.4.1 Inspections

Formal inspections of Sanitary Landfill will be conducted quarterly. The quarters will be calendar quarters—January 1 through March 31, April 1 through June 30, July 1 through September 30, and October 1 through December 31. With the small size of IPP's landfill, quarterly formal inspections will identify problems in time to correct them before they harm human health or the environment. In addition, the operators who haul waste to the landfill will report any condition not consistent with normal operating procedures for the landfill to their supervisor. The inspection form used for the quarterly inspection is in Appendix 4.

7.4.2 Daily Operating Records

The Sanitary Landfill at IPP is a small Class IIIb landfill that has a yearly throughput of about 900 tons per year. All material is hauled to the landfill in metal dumpsters. These dumpsters are weighed as they are hauled to the landfill. The tare weight of the truck and each empty dumpster has been entered on the daily weigh sheet. Each full dumpster weight is entered on this sheet for the appropriate dumpster number and the day it was hauled to the landfill. The daily sheet is an Excel spreadsheet that calculates the total weight of material placed in the landfill each day and week. Because IPSC's truck scales weigh in pounds instead of tons, all weights are recorded in pounds to the nearest 10 pounds. At the end of the year, the weights are totalized and converted to tons. The daily weigh sheet is filled out on dates when waste is hauled to the sanitary landfill. See Appendix 5 for a copy of the daily operating record.

Since the waste comes only from the IPP site, the type of waste received is not recorded. The waste type does not vary and is described in the application. On the back of the weigh sheet is a space to record when cover material is placed over the waste. Training records are kept separate with the Training Department. Monitoring of groundwater and gas is not required for a Class IIIb landfill. Inspection logs are kept by the Environmental Group.

7.4.3 Training for Operation of the Landfill

The people who operate the landfills are in the job classification "fuel equipment operator." These are the operators who usually run mobile equipment such as trucks, backhoes, and graders as opposed to fixed equipment such as the boiler in the power plant. An operations supervisor oversees the work of the fuel equipment operators. Work at the landfills comprises only part of the jobs assigned to the fuel equipment operators.

The training schedules for the fuel equipment operators and the laborers are attached in Appendix 6. A printout of the slides that accompany the Landfill Operations training is also attached.

Landfill Operations is a specific training course pertaining to the operation of the landfill. This training is required those working around the landfill. Below is an outline of material covered in this training.

- General layout and design of each landfill.
- The types of waste that can be placed in the Sanitary and Combustion By-Products Landfills.
- The wastes prohibited from being placed in each landfill.
- Procedures for placing waste in each landfill including cover to keep the waste confined to the landfills and inspections of the waste.
- Procedures to control fugitive dust.
- Recordkeeping.

7.5 Rehabilitation

Rehabilitation measures will be taken as soon as possible after any phase of the landfill cell is filled to the maximum design height. These measures will include the placement of a layer of earth and cover soil to a minimum thickness of two feet over the filled area, dressing and grooming of exposed slopes, revegetation, and erosion control. Revegetation will take place during the spring or fall months to maximize successful plant growth.

The earth and topsoil layer will be compacted by truck or equipment tire rolling. All slopes will be contoured by rounding at the top. Horizontal areas will be sloped to drain excessive rain. During revegetation, discing may be done across the slope to help hold moisture and to promote growth of the revegetation. Average rainfall is about 8 inches (1938 - 2000 average).

The project has, in the past, contracted with a rehabilitation and vegetation consultant who has furnished revegetation and erosion control studies for the plant site. These studies will be implemented, as applicable, to the landfill area as part of the rehabilitation measures for each phase.

7.6 Alternative Waste Disposal Sites

The need for an alternative waste disposal site is an unlikely condition as IPSC owns the land and operates the Sanitary Landfill. Should sanitary waste be prevented from being placed in the Sanitary Landfill for any reason, three options are available.

- Option 1: At IPP, the sanitary waste is collected from around the site and placed in metal dumpsters. These dumpsters are two sizes, 28 and 37 cubic yards. If waste is only prevented from being placed in the landfill for a short time (up to 14 days), the sanitary waste can be stored in the dumpsters.

- **Option 2:** In the 50 acre approved landfill site, another trench could be dug in a different area. The trench would follow the plan of the landfill and be located in an area that would be used at a later time.
- **Option 3:** If all areas of the landfill could not be used, the waste could be hauled to the Millard County Landfill near Delta, Utah. This landfill is within 20 miles of the plant site.

Equipment breakdown could prevent the digging of trenches and the hauling of sanitary waste to the landfill site. If the large backhoe that normally digs the trenches is not available, an option would be to use another piece of equipment to dig the trenches. IPSC has a smaller backhoe and several dozers that could be used to dig trenches. Renting equipment or having a local contractor dig the trenches are also options.

Should the truck that hauls the metal dumpsters to the Sanitary Landfill breakdown, several options could be used. If the truck is down for a short time, the waste can be stored in the metal dumpsters. Alternatively, IPSC has a 10 yard truck that could be used to haul waste. IPSC could also rent a truck to haul the dumpsters or Millard County has a dumpster truck that could be hired.

Attachment 3

January / February

2018

Daily Operating Record IPSC Sanitary Landfill

Loads are inspected to ensure only approved industrial IIIb waste of the type miscellaneous operation wastes, common refuse, and special wastes are disposed of in the landfill.

dumpster#	Tare wt	Mon	Tue	Wed	Thu	Fri	Sat	Sun	dumpster#	Tare wt	Mon	Tue	Wed	Thu	Fri	Sat	Sun
		1/29/2018	1/30/2018	1/31/2018	2/1/2018	2/2/2018	2/3/2018	2/4/2018			1/29/2018	1/30/2018	1/31/2018	2/1/2018	2/2/2018	2/3/2018	2/4/2018
1	Gross								18	Gross							
30800	Net								30720	Net							
2	Gross								19	Gross							
30180	Net								30320	Net							
3	Gross								20	Gross							
30160	Net								30020	Net							
4	Gross								21	Gross							
31960	Net								31700	Net							
5	Gross								22	Gross							
30240	Net								30160	Net							
6	Gross								23	Gross							
30460	Net								30620	Net							
7	Gross								31	Gross							
30620	Net								31700	Net							
8	Gross								32	Gross							
32160	Net								31700	Net							
11	Gross								33	Gross							
30020	Net								31960	Net							
12	Gross								34	Gross							
30220	Net								31420	Net							
13	Gross								35	Gross							
32420	Net								31620	Net							
14	Gross								36	Gross							
29300	Net								31600	Net							
16	Gross								37	Gross							
30540	Net								30000	Net							
17	Gross								38	Gross							
32080	Net								30320	Net							
<i>Haulers Signature</i>									<i>Haulers Signature</i>								

This form to be dated and signed at the end of each operating day with the number of loads and the weight recorded. The section on the back shall be completed with date and signature each day the landfill is covered. Completed form forwarded to the environmental group. See back for initials names.

Cover Material at the IPSC Sanitary Landfill

Cover Date							
Cover amount							
Cover area							
Signature							

This form to be completed every time cover is placed on the landfill, with date, fill amount, and fill area recorded.

COVER

Does waste put in the landfill this day need cover to prevent blowing litter, fires, odor, fugitive dust, scavenging, and vectors?
If yes then cover and fill in top section to document cover.

Date	Status		Inspector	Date	Status		Inspector	Date	Status		Inspector
1	Yes	No		11	Yes	No		21	Yes	No	
2	Yes	No		12	Yes	No		22	Yes	No	
3	Yes	No		13	Yes	No		23	Yes	No	
4	Yes	No		14	Yes	No		24	Yes	No	
5	Yes	No		15	Yes	No		25	Yes	No	
6	Yes	No		16	Yes	No		26	Yes	No	
7	Yes	No		17	Yes	No		27	Yes	No	
8	Yes	No		18	Yes	No		28	Yes	No	
9	Yes	No		19	Yes	No		29	Yes	No	
10	Yes	No		20	Yes	No		30	Yes	No	
								31	Yes	No	

DETAILED INSPECTION OF WASTE LOAD TO LANDFILL

Detailed inspection of load to Landfill on this date

Only wastes allowed by permit were in this load

Date: _____

Inspector: _____

Yes

No

Attachment 4

Sanitary Landfill Inspection Check List

A check in the shaded boxes indicate abnormal condition

Date of Inspection	Inspection Item	Yes	No	Has the problem been corrected. Date Completed
	Are the access roads to the Sanitary landfill adequately treated to control fugitive dust from vehicles?			
	The drainage berm/slope on open side of trench in place to prevent storm water from entering the landfill cell			
	The material in the landfill cell presents a blowing trash problem.			
	The surrounding area of the landfill has excessive blowing trash.			
	The boundary fence is in good condition			
	All the landfill signs present at the required locations.			
	The asbestos trenches covered.			
	There is an Insect/rodent problem.			
	Site drainage ditches are clear of debris.			
	Any condition that would lead to the release of wastes to the environment or threat human health. Enter notes below.			
	Any sign of prohibited wastes in landfill.			

Inspector's Name & Signature. _____
Print Signature

Additional Notes: