

**Attachment 1**  
**Operations Plan**

## **PLAN OF OPERATION**

### **INTRODUCTION**

This document constitutes the plan of operation for the Kanab Sanitary Landfill and is intended to comply with guideline R315-302-2(2) of the Utah Division of Solid and Hazardous Waste Administrative Rules. Technical questions and comments may be directed to:

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### **INTENDED SCHEDULE OF CONSTRUCTION**

The Kanab Sanitary Landfill is capable of meeting solid waste disposal needs for the District for many years. The landfill is operating, so the intended construction schedule contemplates continuing operations throughout the active life of the landfill. The current cell is planned for a capacity of approximately 5 to 10 years and will be expanded in an ongoing manner as portions of the cell attain final elevation. A schedule listing major activity for the next 10 years of operation is found below. The schedule may be updated as part of the regular permit review process.

April 2021	Submit revised permit to Solid and Hazardous Waste
April 2021	Obtain revised permit.
May 2021 to May 2031	Close portions of the landfill reaching final elevation and expand cell to provide additional disposal space.

### **HANDLING PROCEDURES**

During the active lift of the landfill material designated for disposal will be brought to the working face where it will be dumped, spread, and compacted. No later than the end of each day's operation, waste will be covered with a minimum of 6 inches of earthen material, or with an alternate daily cover approved by the Director. Currently proposed alternate daily covers include a temporary synthetic cover (tarp) with a minimum nominal thickness of 8 mils and a minimum tensile grab strength of 100 lbs. If used, the synthetic cover will be removed at least weekly, and waste will be covered with 6" of earthen material. Covering operations shall minimize

the possibility of infiltration. Procedures for the handling of specific wastes including but not limited to dead animals, large appliances, car bodies, and asbestos are delineated below.

The landfill currently accepts only non-friable asbestos waste for disposal. Although not currently planned, friable asbestos wastes may be accepted if the conditions of UACR 315-315-2 are satisfied as follows: a) the asbestos waste is adequately wetted and properly containerized by double bagging and sealing in 6 mil or thicker plastic bags to prevent fiber release and b) asbestos waste containers are generated and tagged with a warning label that conforms to the requirements of 40 CFR Part 61.149(2).

If properly transported and packaged, asbestos waste which meets the above criteria is received at the landfill, the operator will:

- Verify the quantities of waste received, sign off on the waste shipment record, and send a copy of the waste shipment record to the generator within 30 days.
- Require vehicles that have transported asbestos waste to be marked with warning signs as specified in 40 CFR Part 61.149(d)(1)(iii);
- Inspect the load to verify that the asbestos waste is properly contained in leak-proof containers and properly labeled.
- Place asbestos containers at the bottom of the active face with sufficient care to avoid breaking the containers.
- Cover the waste within 18 hours with a minimum of six inches of material that does not contain asbestos.
- Provide barriers to limit public access to the asbestos disposal area until the waste has been covered with six inches of material which does not contain asbestos; and
- Place warning signs at the entrance and around the perimeter of the asbestos disposal area which comply with 40 CFR 61.154(b).

If the attendant believes the condition of an incoming asbestos load is such that significant amounts of fiber may be released during disposal, the attendant will notify the local and regional health departments and the Director. If the wastes are not properly containerized, and the landfill operator inadvertently accepts the load, the operator shall thoroughly soak the asbestos material with a water spray prior to unloading, rinse out the haul truck, dispose of the waste near the base of the active face, and immediately cover the waste prior to compaction with six inches of non-asbestos material in a manner sufficient to prevent fiber release.

Ash will be transported in such a manner to prevent leakage or the release of fugitive dust. The

landfill operator will unload the transport vehicles at the bottom of the working face and keep the ash wetted, if necessary, to prevent fugitive emissions prior to covering; and within 24 hours, the operator will completely cover the ash with a minimum of 6 inches of other non-ash landfill waste or a minimum of 6 inches of material containing no waste or use other methods or materials, if necessary, to control fugitive dust.

Bulky waste such as automobile bodies, furniture, and appliances will be pushed onto the working face near the bottom of the cell or into a separate disposal area.

The landfill will minimize liquids by prohibiting containerized liquids or waste containing free liquids in containers larger than five gallons, noncontainerized liquids, and/or sludges containing free liquids. No waste treatment plant sludge, digested wastewater, treatment plant sludge, or septage containing free liquids will be disposed in portions of the landfill containing other solid waste. Water treatment plant sludge, or septage containing no free liquids will be placed at or near the bottom of the landfill working face and covered with solid waste or other suitable cover material.

Dead animals received at the facility will be deposited onto the working face at or near the bottom of the cell with other solid waste, or into a separate disposal trench provided they are covered daily with a minimum of 6 inches of earth to prevent odors and the propagation and harborage of rodents and insects.

Areas of the landfill that have not received waste for a period of more than 30 days will be covered with an intermediate cover that consists of a minimum of 12 inches of earthen material.

## INSPECTIONS AND MONITORING

Inspection and monitoring at the Kanab Sanitary Landfill will be conducted in two components: 1) routine and 2) compliance. Routine inspections will be conducted on incoming material on a random basis 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 on 1% of the public using the facility and will be recorded on the appropriate forms (see Exhibit 4b). 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, a detailed annual inspection will be conducted to verify compliance with all permit conditions and state and federal regulations. All inspection records will be kept at the landfill or the closest reasonable location for the current calendar year. Within 30 days of the end of the calendar year, annual records will be transferred to the District offices and will be stored for a minimum of three years.

## **FIRE/EXPLOSION CONTINGENCY PLAN**

In the event of fire or explosion which prevents the use of the active area of the Kanab Sanitary Landfill, an alternate area of the landfill will be designated for temporary disposal. If use of the alternate area extends beyond one week, a plan of operation acceptable to the Director will be developed.

## **CORRECTIVE ACTION FOR CONTAMINATED GROUND WATER**

This section describes corrective actions to be taken by owners and operators to regain compliance with protection levels for the Kanab Sanitary Landfill in the event concentration limits are exceeded in a down gradient well as a result of landfill operations.

No monitoring wells are proposed for the Kanab Landfill. However, if the concentrations of parameters in down gradient wells exceed the concentration limits as a result of landfill operations and as substantiated by confirmatory analyses, owners and operators of the Kanab Sanitary Landfill will implement a corrective action program as outlined in R315-308.

## **CONTINGENCY PLAN FOR OTHER RELEASES**

This section describes corrective actions to be taken by the Kanab Sanitary 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 Kanab Sanitary Landfill will implement a corrective action program approved by the Director.

## **DUST CONTROL / AIR QUALITY**

Fugitive dust is not anticipated to reach unacceptable levels at the Kanab Sanitary Landfill. If fugitive dust exceeds acceptable levels, actions will be implemented to reduce dust. These actions may include watering access roads, developing wind breaks, altering management scenarios, or other appropriate measures.

## **LITTER CONTROL**

Litter is controlled through use of best management practices. Active areas and working faces are limited; waste is covered shortly after deposition; and blowing trash is confined as much as practical. In addition, litter control fencing may be established along the perimeter of the active area.

However, high winds occasionally occur at the landfill. Unacceptable litter escaping the perimeter of the landfill will be periodically picked up by hand.

### **EQUIPMENT MAINTENANCE**

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

### **EXCLUSION OF HAZARDOUS WASTE**

As a small rural landfill, the Kanab facility is in a favorable position regarding exclusion of hazardous waste. During periods when the landfill is not open to the public, waste will be observed as it is removed from the collection vehicle. The waste will be further examined for hazardous materials as it is being spread by the operator and compacted. Appropriate notations regarding hazardous waste will be made on the Daily Record forms. If unacceptable hazardous materials are found, the collection vehicle driver will be notified and the unacceptable substance will be removed from the landfill.

During periods when the landfill is open for public disposal as least one percent of the vehicles and other suspicious loads will be directed to dispose of their material near the working face. The waste generator will be detained while the load is inspected. For large loads, the waste will be spread, and landfill operators will walk through the waste. If prohibited hazardous or prohibited waste containing PCB's are encountered, they will not be accepted. Considering 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 (see Exhibit 4b). Including hazardous/PCB waste records on the daily record forms will allow landfill managers to incorporate inspections into their daily routine and will permit regulators to review inspection patterns efficiently while examining waste volumes.

### **DISEASE VECTOR CONTROL**

The primary method for disease vector control at the Kanab Sanitary Landfill will be providing appropriate cover at the close of each day's operation. The cover will consist of a 6-inch minimum layer of earthen material or an approved alternated daily cover.

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 deposited in the emergency disposal site and covered with an approved alternate daily cover. Procedures will continue in this manner until operations at the landfill can return to normal.

In the event of equipment breakdown that cannot be repaired in a reasonable time frame, equipment will be borrowed from contributing entities or leased from local distributors.

#### **TRAINING AND SAFETY PLAN**

Currently two District employees involved with the Kanab Sanitary Landfill have participated in the Manager of Landfill Operations Training Course and the Waste Screening Training Course provided by the Solid Waste Association of North America (SWANA). Limited training and educational experience exist for operators of rural landfills; however, employees will be encouraged to attend appropriate seminars and training as time and budgets permit. All landfill employees have been provided with timely and sufficient training to operate the landfill within regulatory requirements. New landfill employees will also be provided with timely and sufficient training to operate the landfill within regulatory requirements. Training opportunities include access to SWANA training materials, on-site training from certified managers, random training from landfill owners, and training from state regulatory staff during on-site inspections.

Safety procedures will conform to OSHA guidelines, and personnel will be encouraged to participate in additional landfill management, waste screening, safety, and first aid workshops.

#### **RECYCLING**

No viable recycling markets currently exist for solid waste disposal at the Kanab Sanitary Landfill. In an effort to promote recycling some compostable material may be diverted from areas designated for Class IV operation. However, no formal recycling program is anticipated for this facility.

#### **ACCESS CONTROL & ONSITE PERSONNEL**

Fencing has been placed around the active cell and any closed areas with a lockable gate

provided at the main entrance of the landfill. The fence and gate eliminate the possibility of unauthorized access.

In addition, landfill personnel are onsite during all hours the facility is open to the public. Contracted collection vehicles may enter the landfill when the facility is not open to the public; however, waste will not be accepted from the public during these periods. The existing schedule is functioning adequately, and the District intends to revise the scheduled operation of the landfill as the need arises and solid waste volumes dictate.

### **ADDITIONAL REQUIREMENTS**

This subsection is provided to comply with requirements of R315-303-3(7). No scales currently exist at the landfill. Volumes of all incoming waste are estimated and recorded in the facility's operation record. A sign is erected at the facility entrance that identifies the name of the facility, the hours during which the facility is open for public use, unacceptable materials, and an emergency telephone number.

Fire protection is accomplished through arrangements made with the local fire department in Kanab. Buildings and active areas are secured to prevent potential harborage of rat and other vectors, such as insects, birds, and burrowing animals.

The size of the unloading area and working face is minimized as much as possible, consistent with good traffic patterns and safe operation. All weather approach and exit roads have been constructed and provide traffic separation and traffic control on-site and at the site entrance. Communication service is provided by telephone. On site employees communicate verbally or with hand signals when required.







**WKCSSD (KANAB) LANDFILL**  
**QUARTERLY METHANE MONITORING REPORT**

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Was the Photoionization Detector (PID) calibrated before use?

Yes      No

<b>Location</b>	<b>PID Reading</b>	<b>Units</b>
Front Gate		
North End Of Pit		
Center Of Pit		
South End Of Pit		

Comments/ Actions Taken:

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