

JAN 12 2022

Douglas J. Hansen, Director
DIVISION OF WASTE MANAGEMENT AND RADIATION CONTROL
195 North 1950 West
P.O. Box 144880
Salt Lake City, UT 84114-4880

DSHW-2022-000570

January 12, 2022

Re: Post Closure Plan for Comstock Mountain Lion Iron Mine Landfill, Iron County Utah, SW310

Post Closure Plan for SW 310

Utah Iron has reviewed the original permit and post closure plan submitted in 2009 with the original application and is hereby submitting this final Post Closure Plan for Comstock Mountain Lion Iron Mine Landfill, Iron County Utah, SW310.

Background

Utah Iron, as a part of the assets that were acquired from the predecessors (Palladon and CML) at the Iron Mountain Mine, obtained a landfill regulated by the Division of Waste Management and Radiation Control. The small landfill is fully closed and is located inside the boundaries of the permitted mine. The landfill was permitted for the express purpose of disposing of materials created on site during the life of the mine and it primarily contains remnants of old buildings and mine structures. The majority of the solid waste disposed was during one working season was between 2009 and 2010 but minimal amounts of waste was deposited after this time. Minor amounts of material were placed into the landfill over the years until the last material was deposited in 2015. Solid waste included rock, concrete, brick, corrugated roofing metal, and wood. Cover has been placed on the site and vegetation has already begun to expand on the landfill site.

The area immediately surrounding the landfill is currently under the Division of Oil, Gas & Mining (OGM) management and was recently seeded (February 2021) and inspected by Kim Coburn of OGM. As a result of this reclamation, the landfill is no longer directly accessible via road or other access ways.

Included in the bonded reclamation plan with OGM, Utah Iron has allocated \$250,000 towards reclamation of the landfill area. Final reclamation of the landfill area is already identified as an obligation of Utah Iron as a part of the existing NOI for mining at the Iron Mountain Mine.

It has been determined that this landfill no longer is needed by the company and a Closure Notice has been provided to the Division. The Post Closure Plan is as follows:

Methods, Procedures, and Processes

All materials disposed of within the existing Class IIIb landfill has been and will continue to be within the acceptable waste constituents of an industrial non-hazardous landfill. When operating, the landfill only accepted non-hazardous waste that was generated at the Iron Mountain Mine site. The waste consists of construction debris, wood, cement, sheet rock, steel and typical types of rubbish that is typical of a mine site. During the time the landfill was operated, traditional waste material from the offices, food prep, etc., were sent to the Iron County landfill. No other wastes were or will be accepted; therefore, this landfill is not a commercial landfill, and no other areas or customers are served.

Maintenance and Control

Access to the facility is restricted through mine security. Signs are posted indicating authorized personnel only are allowed on the access roads leading into the plant. Motorized access to the landfill has been limited since at least 2013, but the reclamation project of 2021, has now fully eliminated all motorized access to the landfill and surrounding areas permanently.

In post closure status, thorough inspections, a minimum of twice per year, shall be conducted and consist of observations for unauthorized access, erosion, sloping, drainage, surface leachate, and run-on. Areas requiring repairs/modifications will be documented and necessary modifications will be made using appropriate materials and compacted, as required. Wind dispersal of landfill litter is minimized by the application of vegetation cover which is now fully mature.

Escape of Air Pollutants/Gases

The contents of this industrial waste landfill have little, or no amounts of putrescible materials and the decomposition of the organic wastes are minimal. The U.S. EPA reports that methane is generated from "municipal" solid waste only when the moisture content exceeds 40% (U.S. EPA, 1994). Due to the limited moisture at the site and the absence of putrescible wastes contained in the heap, methane gas generation is not anticipated. Vector, dust, and odors are effectively controlled so they are not a nuisance or hazard to health, safety or property. None of the waste is flammable, but combustible waste may exist; however, a fire or explosion in the landfill area is highly unlikely. The area is served by the local fire department, and equipment is located onsite to move soil for fire suppression, if necessary.

Control of Run-off

Runoff from the landfill is not expected to occur due to the design of the landfill. The landfill has been designed so that all run-on and run-off will be redirected with diversion ditches into sediment ponds, where the water will be evaporated. After closure, the absorption and evapotranspiration by the vegetation layer and the absence of any appreciable run-on will ensure the control of runoff. Once the vegetation layer growth is established, most storm events will not result in significant direct run-off from the landfill surface area. Nonetheless, significant percolation through the cover layer is unlikely, thus leachate or seepage from the heap is minimal. This will be a key component in the bi-annual inspections for the closed facility.

Drainage Plan

Drainage will consist of water being redirected by diversion ditches around the waste dump. This water is intended to accumulate in sediment ponds to eventually be evaporated. Utah Iron will continue to monitor drainage, erosion and associated events at the closed landfill.

Composition of Cover

The final cover system was made of the compacted soil layer, and vegetation layer. The combination of which is intended to protect the site from erosion, or other impacts during post closure. The material used for final cover was placed on the graded, compacted, soil cover layer (12 inches of mixed soil from the topsoil storage pile) above an additional 12 inches of native material from the site. The soil layer material was compacted and was composed of clay silt-sand mixture with a low permeability. In post closure, the soil layer will be retained at no less than 12 inches of compacted soil and will come from onsite sources. These two layers total 24 inches of compacted soil, which will serve to minimize

infiltration into the closed site. A vegetation layer (plant matter) of no less than 6 inches has been applied. The vegetation layer will be of an organic composition that will support native or compatible plant life. The final cover depth will be maintained at no less than 24 inches and vegetation will be monitored for vigor.

Sloping

The final cap has been contoured such that the grade is greater than 2 percent and less than 33 percent and the site has been successfully revegetated with vegetation approved by the Division as a part of the original permit. Utah Iron will monitor and repair erosion and settling to ensure this stays within this guidance in the future.

Vegetation

Vegetation has been managed in accordance with the overall site reclamation plans on file with the Division of Oil, Gas and Mining. Regular site inspections will be conducted as a part of the active and post mining processes and vegetation will have to meet all applicable standards before bonds or other surety's may be released.

Description of Monitoring and Maintenance

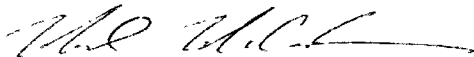
Qualified personnel will be located near or around the landfill to supervise continued activities during post closure. The Mine Manager and Permitting Specialist for the Mine will have primary responsibility for monitor the site. The post closure activities of the landfill will be concurrent with the landfill's final development. Future Mine operations and inspections will proceed in a manner that will minimize the impact on the landfill.

Regulatory Inspections

Utah Iron will facilitate and host inspections from the Division of Waste Management, DOGM or any other regulatory entities relevant to the post closure notice. It is anticipated that visits will be scheduled but Utah Iron will use best efforts to facilitate site visits with minimal notice, so long as they can be conducted within the operational and safety protocols established by DOGM, MSHA, OSHA and other relevant authorities.

Utah Iron will continue to conduct a minimum of two formal site inspections each year during post closure. CML will work with the Division to develop a formal inspection form or will use the original form that was submitted in the original application. The approved form will be submitted upon completion of the bi-annual site inspections.

Utah Iron, LLC., here by submits this Post Reclamation Plan to the Division of Waste Management and Radiation Control, January 3, 2022.



Date: January 12, 2022

Michael McCandless, Permitting and Government Relations

Utah Iron, LLC.

6249 West Gilbert Industrial Court

City, State, Zip: Hurricane, UT 84737

Phone: (435) 627-1907

Contact Personnel

The following positions and personnel represent Utah Iron's contact list of responsible officials as they pertain to the Iron Mountain Landfill operation, closure, and post-closure issues.

Federal EIN 85-1836779_

Corporate Address: Utah Iron
6249 West Gilbert Industrial Court
City, State, Zip: Hurricane, UT 84737
Phone: (435) 627-1907 Fax: (435) 627-2938

Physical Address: Utah Iron / Gilbert Development
2708 South Comstock Rd.
Cedar City UT, 84720
Phone: (435) 986-4927 Fax: (435) 627-2938

Mine Mailing Address: Utah Iron
P.O. Box 747
Cedar City, UT 84721

Authorized Officer: Steve Gilbert
Address: 6249 West Gilbert Industrial Court
City, State, Zip: Hurricane, UT 84737
Phone: (435) 627-1907 Fax: (435) 627-2938
E-mail Address: steve@gilbertdevelopment.com

Registered Utah Agent: Cyndi W. Gilbert
Address: 1091 S Toquer Blvd – Box 190
Toquerville, UT 84774
Phone: (435) 627-1907 Fax: (435) 627-2938
E-mail Address: cwg@infowest.com

Mine Manager: Adam Urquidez
Address: 6249 West Gilbert Industrial Court
City, State, Zip: Hurricane, UT 84737
Phone: (435) 627-1907 Fax: (435) 627-2938
E-mail Address: adam@gilbertdevelopment.com

Permitting Manager: Michael McCandless
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Phone: (435) 627-1907 Fax: (435) 627-2938
E-mail Address: mbmfossil@gmail.com



deq submit <dwmrcsubmit@utah.gov>

Fwd: Updated Closure Notice and Post Closure Plan for SW310, Comstock Mountain Lion Landfill

1 message

Matt Sullivan <msullivan@utah.gov>
To: deq submit <dwmrcsubmit@utah.gov>

Wed, Jan 12, 2022 at 5:03 PM

Div of Waste Management
and Radiation Control

Comstock/Mountain Lion Iron Mine Class IIIb Landfill
SW310

JAN 12 2022

----- Forwarded message -----

From: **Mike McCandless** <mbmfossil@gmail.com>

Date: Wed, Jan 12, 2022 at 4:51 PM

Subject: Updated Closure Notice and Post Closure Plan for SW310, Comstock Mountain Lion Landfill

To: Matt Sullivan <msullivan@utah.gov>

Cc: Kim Coburn <kcoburn@utah.gov>, Miken Larsen <miken@utahironllc.com>, Adam Gdc Email <adam@gilbertdevelopment.com>, Cyndi Gilbert <cwg@infowest.com>

Matt,

I have made the suggested edits to the original version. Thank you. Please accept the attached 2 documents, the Closure Notice and the Post Closure Plan for SW310, Comstock Mountain Lion Landfill, on behalf of Utah Iron, LLC. Please forward on to Douglas Hansen on our behalf, thank you.

I am copying Kim Coburn from the Division of Oil, Gas and Mining, since they also are an interested party to the closure and post closure uses of the landfill. I have also copied the rest of our key Utah Iron team. Thank you for your assistance in this matter.

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Mike McCandless
(435) 749-1368

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Matt Sullivan | Environmental Scientist

Solid Waste Program, Division of Waste Management & Radiation Control

Email: msullivan@utah.gov

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Statements made in this email do not constitute the official position of the Director of the Division of Waste Management and Radiation Control. If you desire a statement of the Division Director's position, please submit a written request to the Director, including copies of documents relevant to your request.

2 attachments

Closure Notice for SW310 Comstock Mountain Lion Landfill Final.docx
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