



State of Utah

SPENCER J. COX
Governor

DEIDRE HENDERSON
Lieutenant Governor

Department of
Environmental Quality

Kimberly D. Shelley
Executive Director

DIVISION OF WASTE MANAGEMENT
AND RADIATION CONTROL

Douglas J. Hansen
Director

April 6, 2022

Austin Weddle, Operations Manager
RN Industries
P.O. Box 1168
Vernal, UT 84078

RE: Request for Information – RNI Ace Class IIIb Exploration and Production Waste Landfill

Dear Mr. Weddle:

The Division of Waste Management and Radiation Control (Division) has reviewed the permit application dated December 23, 2020 (DSHW-2020-018771) for the RNI Ace Class IIIb Exploration and Production Waste Landfill (Ace Landfill). There are a few items that the Division would like to have corrected.

The following elements should be addressed, and a corrected version (or replacement pages and drawings) shall be provided to the Division to complete the permit application:

1. Part II, 3.2.3 – Waste Disposal – Unless Ace Landfill can justify the use of just 12” protective layer of drain sand, the Division recommends using at least an 18” to fully protect the liner before any waste is disposed of. Please make changes to Drawings B-4 and B-5 to reflect these changes.
2. Part III, Figure 1, Pages 13 and 14 – Please remove the name Bluebell and replace it with Ace so the application is specific to the Ace Landfill.
3. Part III, 3.2 – Design of the Final Cover. Please provide an updated evapotranspiration (ET) cover design by specifying a clay layer of adequate thickness and covering it with more topsoil to provide an effective and lasting landfill cover. Please make changes to Drawings B-4 and B-5 to reflect these changes.
 - (a) The Division disagrees with the use of just 6 inches of a clayey soil layer placed on the waste prior to placing the topsoil layer. A thin layer such as this could not be compacted. ET covers, such as discussed in Part III, Section 3.2., have not been shown effective when designed less than 40” thick, and most are thicker.

(Over)

- (b) Although the Division previously provided approval of the ET cover for the RNI Bluebell landfill, that cover is similar to the one described in the Ace Landfill application and will not be effective. When it comes time for placing the final cover on the RNI Bluebell Landfill, it will also require a more protective design if RNI chooses to use an ET cover.

If you have any questions, please call Doug Taylor at (801) 536-0240.

Sincerely,



Brian Speer, Solid Waste Program Manager
Division of Waste Management and Radiation Control

BS/DT/wa

- c: Kirk Bengel, Health Officer, Tri-County Health Department
Darrin Brown, LEHS, Environmental Health Director, Tri-County Health Department
Nathan Hall, P.E., District Engineer, UDEQ
Jon Peadar, GEOSTRATA (Email)