



State of Utah

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Department of  
Environmental Quality

Kimberly D. Shelley  
*Executive Director*

DIVISION OF WASTE MANAGEMENT  
AND RADIATION CONTROL

Douglas J. Hansen  
*Director*

December 9, 2021

Danny Little, Landfill Manager  
Western Kane County Special Service District  
P.O. Box 36  
Kanab, UT 84741

RE: Permit to Operate the Kanab Sanitary Class II Landfill, Kane County  
SW131

Dear Mr. Little:

Enclosed is the approved permit to operate the Kanab Sanitary Class II Landfill. The public comment period for the permit began on October 12, 2021 and ended on November 10, 2021. 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 Southwest 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,

Douglas J. Hansen, Director  
Division of Waste Management and Radiation Control

DJH/MS/wa

Enclosures: Kanab Sanitary Class II Landfill Permit (DSHW-2021-009208)  
Attachment 1, Operations Plan (DSHW-2021-012582)  
Attachment 2, Closure and Post-Closure Plans (DSHW-2021-012584)  
Statement of Basis (DSHW-2021-021402)

c: Jeremy Roberts, Environmental Health Director, Southwest Utah Public Health Department  
Paul Wright, P.E., UDEQ District Engineer

DSHW-2021-021422

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DIVISION OF WASTE MANAGEMENT  
AND RADIATION CONTROL  
SOLID WASTE LANDFILL PERMIT

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Kanab Sanitary Class II Landfill

Pursuant to the provision of the 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, R315-301 through 320 of the Utah Administrative Code adopted thereunder, a Permit is issued to:

Western Kane County Special Service Dist # 1 as owner and operator,  
(Permittee),

to own and operate the Kanab Sanitary Class II Landfill located in Kane County, Utah as shown in the Permit Renewal Application that was determined complete on May 12, 2021 (DSHW-2021-006831).

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

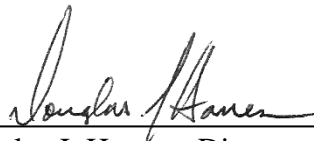
All references to R315-301 through 320 of the Utah Administrative Code are to regulations that are in effect on the date that this permit becomes effective.

This Permit shall become effective December 9, 2021.

Closure Cost Revision Date: December 9, 2026.

This Permit shall expire at midnight December 8, 2031.

Signed this 9<sup>th</sup> day of December, 2021.



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Douglas J. Hansen, Director  
Division of Waste Management and Radiation Control

### FACILITY OWNER/OPERATOR INFORMATION

LANDFILL NAME:	Kanab Sanitary Class II Landfill
OWNER NAME:	Western Kane County Special Service Dist # 1
OWNER ADDRESS:	P.O. Box 36, Kanab, Utah 84741
OWNER PHONE NO.:	(435) 644-5089
OPERATOR NAME:	same as above
OPERATOR ADDRESS:	same as above
OPERATOR PHONE NO.:	same as above
TYPE OF PERMIT:	Class II Landfill
FACILITY LOCATION	1000 East Kaneplex Drive, Kanab, Utah (Utah/Arizona state line off U.S. Highway 89A)
PERMIT NUMBER:	9713R3
PERMIT HISTORY	This facility first received a permit to accept solid waste in 1997. This is the third renewal of the permit. This renewal permit is effective on the date shown on the signature page.

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

The Permit renewal application, received April 22, 2021 (tracking number 2021-007004) for the Kanab Sanitary Class II Landfill, was deemed complete on the date shown on the signature page of this Permit. All representations made in the attachments of this permit 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.

This Permit consists of the signature page, Facility Owner/Operator Information section, sections I through IV, and all attachments to this Permit.

The facility as described in this Permit consists of a Class II landfill, recyclable materials and green waste staging areas, and a used tire collection staging area.

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 Permittee 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, in either real or personal property, or any exclusive privileges. 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 Permittee is subject to the following conditions.

## **PERMIT REQUIREMENTS**

### **I. GENERAL COMPLIANCE RESPONSIBILITIES**

#### **I.A. General Operation**

I.A.1. The Permittee shall operate the landfill in accordance with all applicable requirements of R315-301 through 320 of the Utah Administrative Code, for a Class II landfill, 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, termination, or denial of a permit renewal application.

#### **I.B. Acceptable Waste**

I.B.1. This Permit is for the disposal of non-hazardous solid waste that may include:

I.B.1.a Municipal solid waste as defined by R315-301-2(47) of the Utah Administrative Code;

I.B.1.b Commercial solid waste as defined by R315-302-2(14) of the Utah Administrative Code;

I.B.1.c Industrial solid waste as defined by R315-302-2(35) of the Utah Administrative Code;

I.B.1.d Construction/demolition solid waste as defined by R315-301-2(17), of the Utah Administrative Code;

I.B.1.e Special waste as allowed by R315-315 of the Utah Administrative Code and authorized in section II.I of this Permit and limited by this section;

I.B.1.f Hazardous waste generated by a very small quantity generator as specified in R315-262-14 of the Utah Administrative Code;

I.B.1.g PCBs as specified by R315-315-7(2) of the Utah Administrative Code; and

I.B.1.h Regulated asbestos-containing material in compliance with R315-315-2 of the Utah Administrative.

I.B.2. The Permittee is limited to an average of 20 tons per day of municipal waste or a service area population of 8900. The daily average shall be determined by dividing the total tons, for facilities with scales, of municipal waste received in a calendar year by 365. For facilities that do not have scales the population served shall be used. If the 20 tons per day average is exceeded or the maximum population served is exceeded, the Permittee shall notify the Director and apply for a new permit for a Class I landfill.

I.C. Prohibited Waste

- I.C.1. Hazardous waste as defined by R315-261-3 of the Utah Administrative Code except as allowed in permit condition I.B.1.f (Acceptable Waste) of this Permit;
- I.C.2. Containers larger than household size (five gallons) holding any liquid; non-containerized material containing free liquids; or any waste containing free liquids in containers larger than five gallons;
- I.C.3. PCBs as defined by R315-301-2(53) of the Utah Administrative Code, except as allowed in Section I.B (Acceptable Waste) of this Permit.
- I.C.4. Any prohibited waste received and accepted for treatment, storage, or 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 Permittee shall allow the Director or an authorized representative, or representatives from the Southwest 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.b 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.c 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.d 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 Permittee 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 Permittee 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 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 Permittee 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 Permittee 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 Permittee fails to comply with any condition of the Permit. The Director will notify the Permittee 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 the Permit Application 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.

I.H. Design and Construction

- I.H.1. The Permittee shall construct any landfill cell, sub-cell, run-on diversion system, runoff containment system, and final cover in accordance with an approved design in accordance with the R315-301 thru 320 of the Utah Administrative Code.  
  
If ground water is encountered during excavation of the landfill, the Director shall be notified immediately, and an alternative construction design shall be developed and submitted for approval.

The Permittee shall notify the Director upon completion of construction of any landfill cell, sub-cell, engineered control system, or any feature where Director approval is required. No landfill cell or engineered control system may be used until as-built documents are submitted and construction is approved by the Director and this permit has been modified to reflect the changes.

The Permittee shall notify the Director of any proposed incremental closure, placement of any part of the final cover, or placement of the full final cover. Design approval shall be received from the Director and this permit modified prior to construction. The design shall be accompanied by a Construction Quality Control and Construction Quality Assurance (CQC/CQA) Plan, for each construction season where incremental or final closure is performed.

A qualified party, independent of the owner and the construction contractor shall perform the quality assurance function on cover components and other testing as required by the approved CQC/CQA Plan. The results shall be submitted as part of the as-built drawings to the Director

All engineering drawings submitted to the Director shall be stamped and approved by a professional engineer with a current registration in Utah.

I.H.2. Run-On Control

I.H.2.a The Permittee shall construct drainage channels and diversions as specified in the Permit Application and shall maintain them at all times to effectively prevent runoff from the surrounding area from entering the landfill.

I.H.3. Equivalent Design

The Permittee proposed a landfill liner design that uses a geosynthetic clay liner in place of the clay component of the liner required by R315-303-3(3)(a)(ii) of the Utah Administrative Code. The proposed liner is approved.

**II. LANDFILL OPERATION**

II.A. Operations Plan

II.A.1. The Permittee shall keep the Operations Plan included in Attachment 1 on site at the landfill or at the location designated in section II.K of this Permit. The Permittee shall operate the landfill in accordance with the operations plan. If necessary, the Permittee may modify the Operations Plan following the procedures of R315-311-2(1) of the Utah Administrative Code and approved of by the Director. The Permittee shall note any modification to the Operations Plan in the daily operating record.

II.B. Security

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



- II.B.2. Lock all facility gates and other access routes during the time the landfill is closed.
- II.B.3. Have at least one person employed by the Permittee at the landfill during all hours that the landfill is open.
- II.B.4. Construct all fencing and any other access controls as shown in the Permit Application to prevent access by persons or livestock by other routes.
- II.C. Training
  - II.C.1. The Permittee shall provide training for on-site personnel in landfill operation, including waste load inspection, hazardous waste identification, and personal safety and protection.
- II.D. Burning of Waste
  - II.D.1. Intentional burning of solid waste is prohibited and is a violation of R315-303-4(2)(b) of the Utah Administrative Code. Except as provided in this paragraph, intentional burning of solid waste is prohibited and is a violation of R315-303-4(2)(b) of the Utah Administrative Code. The Permittee is allowed to burn material by complying with the requirements of R307-202-5 of the Utah Administrative Code. The Permittee shall perform such burning in a segregated area within the landfill site. The Permittee shall extinguish all accidental fires as soon as reasonably possible. The Permittee's non-compliance with R307-202-5 of the Utah Administrative Code, as determined by the Director of the Division of Waste Management and Radiation Control, also constitutes non-compliance with this Permit.
  - II.D.2. The Permittee shall extinguish all accidental fires as soon as reasonably possible.
- II.E. Daily Cover
  - II.E.1. The Permittee shall completely cover the solid waste received at the landfill at the end of each working day with a minimum of six inches of earthen material.
  - II.E.2. The Permittee may use an alternative daily cover material when the material and the application of the alternative daily cover meets the requirements of R315-303-4(4)(b) through (e) of the Utah Administrative Code.
- II.F. Ground Water Monitoring
  - II.F.1. This facility is not required to monitor ground water (R315-303-3(3)(e)(iv) of the Utah Administrative Code).
- II.G. Gas Monitoring
  - II.G.1. The Permittee shall monitor explosive gases at the landfill in accordance with the Gas Monitoring Plan contained in the Permit Application and shall otherwise meet the requirements of R315-303-3(5) of the Utah Administrative Code. If necessary, the Permittee may modify the Gas Monitoring Plan, provided that the modification meets all of the requirements of R315-301 through 320 of the Utah Administrative Code and is approved by the Director as a minor modification under R315-311-2(1) of the

Utah Administrative Code. The Permittee shall note any modification to the Gas Monitoring Plan in the daily operating record.

- II.G.2. If the concentrations of explosive gases at any of the facility structures, at the property boundary, or beyond the property boundary ever exceed the standards set in R315-303-2(2)(a) of the Utah Administrative Code, the Permittee shall:
  - II.G.2.a Immediately take all necessary steps to ensure protection of human health and notify the Director;
  - II.G.2.b Within seven days of detection, place in the daily operating record the explosive gas levels detected and a description of the immediate steps taken to protect human health;
  - II.G.2.c Implement a remediation plan that meets the requirements of R315-303-3(5)(b) of the Utah Administrative Code; and
  - II.G.2.d Submit the plan to, and receive approval from, the Director prior to implementation.

II.H. Waste Inspections

- II.H.1. The Permittee shall visually inspect incoming waste loads to verify that no wastes other than those allowed by this permit are disposed in the landfill. The Permittee shall conduct a complete waste inspection at a minimum frequency of 1 % of incoming loads, but no less than one complete inspection per day. The Permittee shall select the loads to be inspected on a random basis.
- II.H.2. The Permittee 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.
- II.H.3. The Permittee shall inspect all loads that the Permittee suspects may contain a waste not allowed for disposal at the landfill.
- II.H.4. The Permittee shall conduct complete random inspections as follows:
  - II.H.4.a The Permittee shall conduct the random waste inspection at the working face or an area designated by the Permittee.
  - II.H.4.b The Permittee shall direct that loads subjected to complete inspection be unloaded at the designated area;
  - II.H.4.c Loads shall be spread by equipment or by hand tools;
  - II.H.4.d Personnel trained in hazardous waste recognition and recognition of other unacceptable waste shall conduct a visual inspection of the waste; and
  - II.H.4.e The personnel conducting the inspection shall record the results of the inspection on a waste inspection form as found in Appendix 1 of this Permit. The Permittee shall place the form in the daily operating record at the end of the operating day.

II.H.4.f The Permittee 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.

II.I. Disposal of Special Wastes

II.I.1. If a load of incinerator ash is accepted for disposal, the Permittee shall transport it to the place of disposal in such a manner as to prevent leakage or the release of fugitive dust. The Permittee shall completely cover the ash with a minimum of six inches of material, or the Permittee shall use other methods or material, if necessary, to control fugitive dust. The Permittee may use ash for daily cover when its use does not create a human health or environmental hazard.

II.I.2. The Permittee 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 Permittee 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 Permittee shall cover animals placed in the trench with six inches of earth by the end of each operating day.

II.I.3. The Permittee shall handle and dispose of asbestos waste in accordance with R315-315-2 of the Utah Administrative Code

II.I.4. The Permittee shall handle and dispose of PCBs in accordance with R315-315-7 of the Utah Administrative Code.

II.J. Self-Inspections

II.J.1. The Permittee 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 Permittee shall complete these general inspections no less than quarterly and shall cover the following areas: Waste placement, compaction, cover; fences and access controls; roads; run-on/run-off controls; intermediate cover; litter controls; and records. The Permittee 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.

II.K. Recordkeeping

II.K.1. The Permittee shall maintain and keep on file at the landfill office shop, 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:

II.K.1.a Records related to the daily landfill operation or periodic events including:

- II.K.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;
  - II.K.1.a.(ii) Major deviations from the approved plan of operation, recorded at the end of the operating day the deviation occurred;
  - II.K.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;
  - II.K.1.a.(iv) Records of all inspections conducted by the Permittee, results of the inspections, and corrective actions taken, recorded in the record on the day of the event.
- II.K.1.b Records of a general nature including:
- II.K.1.b.(i) A copy of this Permit, including the Permit Application;
  - II.K.1.b.(ii) Results of inspections conducted by representatives of the Director, and of representatives of the local Health Department, when forwarded to the Permittee;
  - II.K.1.b.(iii) Closure and Post-closure care plans; and
  - II.K.1.b.(iv) Records of employee training.

II.L. Reporting

- II.L.1. The Permittee 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.

II.M. Roads

- II.M.1. The Permittee shall improve and maintain all access roads within the landfill boundary that are used for transporting waste to the landfill for disposal shall be improved and maintained as necessary to assure safe and reliable all-weather access to the disposal area.

II.N. Litter Control

- II.N.1. Litter resulting from operations of the landfill shall be minimized. In addition to the litter control plans found in Attachment 1 of the Permit Application, the Permittee shall implement the following procedures when high wind conditions are present:
  - II.N.1.a Reduce the size of the tipping face;
  - II.N.1.b Reduce the number of vehicles allowed to discharge at the tipping face at one time;
  - II.N.1.c Orient vehicles to reduce wind effects on unloading and waste compaction;

- II.N.1.d Reconfigure tipping face to reduce wind effect;
- II.N.1.e Use portable and permanent wind fencing as needed; and
- II.N.1.f Should high winds present a situation that the windblown litter cannot be controlled, the Permittee shall cease operations of the landfill until the winds diminish.

### **III. CLOSURE REQUIREMENTS**

#### **III.A. Closure**

III.A.1. The Permittee shall install final cover of the landfill as explained in Attachment 2. The final cover shall meet, at a minimum, the standard design for closure as specified in the R315-303-3(4) of the Utah Administrative Code plus sufficient cover soil or equivalent material to protect the low permeability layer from the effects of frost, desiccation, and root penetration. The Permittee shall submit to the Director a quality assurance plan for construction of the final landfill cover, and approval of the plan shall be received from the Director prior to construction of any part of the final cover at the landfill. A qualified person not affiliated with the Permittee or the construction contractor shall perform permeability testing on the recompacted clay placed as part of the final cover.

#### **III.A.2. Title Recording**

III.A.2.a The Permittee shall meet the requirements of R315-302-2(6) of the Utah Administrative Code by recording a notice with the Kane 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 Permittee shall provide the Director the notice as recorded.

#### **III.B. Post-Closure Care**

III.B.1. The Permittee shall perform post-closure care at the closed landfill in accordance with the Post-Closure Care Plan contained in Attachment 2. 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.

#### **III.C. Financial Assurance**

III.C.1. The Permittee 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 Permittee shall adequately fund and maintain the financial assurance mechanism(s) 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, and the Permittee shall fully fund the trust fund within ten years of the date waste is first received at the landfill.

- III.C.2. With each annual revision of the closure and post-closure care cost estimate, the Permittee 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.

III.D. Financial Assurance Annual Update

- III.D.1. The Permittee 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.

III.E. Closure Cost and Post-Closure Cost Revision

- III.E.1. The Permittee 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.

**IV. ADMINISTRATIVE REQUIREMENTS**

IV.A. Permit Modification

- IV.A.1. Modifications to this Permit may be made upon application by the Permittee/s or by the Director following the procedures specified in R315-311-2 of the Utah Administrative Code. The Permittee shall be given written notice of any permit modification initiated by the Director.

IV.B. Permit Transfer

- IV.B.1. 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.

IV.C. Expansion

- IV.C.1. This Permit is for a Class II Landfill. The permitted landfill shall operate according to the design and Operation Plan described and explained in this Permit. 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.

- IV.C.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.
- IV.C.3. Any addition to the acceptable wastes described in Section I.B shall require submittal of all necessary information to the Director and the approval of the Director.
- IV.C.4. Acceptance for PCB bulk product waste under R315-315-7(3)(b) of the Utah Administrative Code can only be done after submittal of the required information to the Director and modification of Sections I.B and I.C of this Permit. Acceptance of a broader waste stream may also require a new permit and compliance with the requirements for a new permit under R315-301 through 320 of the Utah Administrative Code and Utah Code Ann. § 19-6-108.
- IV.D. Expiration
- IV.D.1. If the Permittee desires to continue operating this landfill after the expiration date of this Permit, the Permittee 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 Permittee timely submits 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.

**V. ATTACHMENTS**

- Attachment 1 – Operations Plan
- Attachment 2 – Closure & Post-Closure Plans

**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:

Danny Little  
PO Box 36  
Kanab, UT 84741  
435-644-5645

### **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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**Attachment 2**  
**Closure and Post-Closure Plans**

## **CLOSURE / POST CLOSURE PLAN**

### **CLOSURE/POST CLOSURE PLAN**

Closure of active portions of the Kanab Sanitary Landfill contemplates controlling, minimizing, and eliminating threats to human health and the environment from post closure escape of solid waste constituents, contaminated runoff, or waste composition products to the ground, groundwater, surface water, and the atmosphere. When an area of the landfill exceeding 5 acres reaches final elevation it will be covered within 60 days with 12 inches of intermediate cover and graded to promote drainage. The surface shall be free from ponding and shall minimize infiltration.

The area will be covered with a minimum of 18 inches of material having a hydraulic conductivity of less than  $1 \times 10^{-5}$  cm/sec or an alternate final cover approved by the Director. The impermeable barrier will be covered with 6 inches of native soil or 6 inches of material capable of supporting vegetative growth.

Post closure care of sections of the landfill will consist of maintaining the integrity of the final and vegetative covers. Any areas subject to erosion will also be corrected; and appropriate measures will be implemented to identify and eliminate the source. Groundwater monitoring, leachate collection, and gas collection are not proposed for the Kanab Sanitary Landfill.

### **CLOSURE SCHEDULE**

Closure operations at the Kanab Sanitary Landfill will be performed on an ongoing basis. Adequate capacity exists at the landfill to continue operation for many years. A final closing date cannot be determined at this time. Ongoing closure operations will generally be performed from April through November, the normal frost free construction period, or as weather permits. No area larger than 5 acres that has achieved final elevation will remain open longer than 6 months.

### **FINAL COVER, SEEDING, CONTOURING**

Closure operations will consist of leveling, contouring, placement of appropriate covers and seeding as necessary to reduce infiltration and preserve the integrity of the completed areas of the landfill. Areas of the landfill reaching final elevation will receive intermediate cover within 60 days. Closure operations will include leveling and contouring using intermediate cover to reduce infiltration and ponding. Excess material not meeting permeability requirements may be stripped and utilized in other operations or left in place. After grading operations promoting

drainage are complete, a geosynthetic clay liner or 18 inches of material with a permeability of  $1 \times 10^{-5}$  cm/sec or less will be installed. Alternate designs meeting the performance standard of impermeable material may be used if approved by the Director prior to placement. Upon completion of the impermeable cover, 6" of native material similar to existing topsoil will be placed and seeded. The seed mixture shall be developed after consultation with local range specialists and verifying availability of local seed markets. Recently closed sections of the landfill will be evaluated as part of the quarterly inspection process during the first year and then placed on post closure status.

### **SITE CAPACITY**

Site capacity for the entire Kanab Sanitary Landfill property cannot be accurately estimated. Assuming an initial 40-acre parcel covered by this permit, trench style operation (40 ft. bottom width, 4:1 side slope, 30 ft. depth), three 8.5 foot lifts of waste with 1.5 foot intermediate cover, and an average density of 900 lbs. per cubic yard, waste volumes can be estimated at 1,056,000 cubic yards or 475,200 tons.

### **CLOSURE TIMING AND NOTIFICATION**

Closure activities at the Kanab Sanitary Landfill will be performed on an ongoing basis. The Director will be notified of closure progress by reviewing quarterly and annual reports, and by contacting Division of Solid and Hazardous Waste inspectors who have visited the site. Considering the ongoing nature of closure operations and the justification for performing closure operations as a cell reaches final elevation, alternate notification procedures may not be feasible.

In addition to the ongoing notification indicated above, The Director will be notified in writing prior to initiation of final cover operations, and the final cover design and the construction quality assurance/quality control (QA/QC) plan will be submitted to the Director for review and approval. The QA/QC plan for closure will include tests for permeability and depth. Permeability tests, where required, will be performed at the rate of test per 9,000 cubic yards of material and will randomly selected throughout the working area. Permeability tests may include in field or laboratory tests, nuclear density extrapolations, or other industry wide procedures and practices. Depth tests will utilize standard cross section survey methods and will be performed at a rate equal to or greater than tests performed for permeability. Closure as built and certification of closure according to the plan identified above will be signed by a registered professional engineer and forwarded to the Director within 90 days of completion.

## **FINAL INSPECTION**

The Kanab Landfill is anticipated to operate well beyond the life of this permit. At least 60 days prior to any closure, the Division of Solid and Hazardous Waste will be contacted, and a final inspection will be scheduled. The Director will be informed of incremental closure of individual cells through routine state inspections, annual reports, and renewal applications. In addition, a QA/QC plan will be submitted for approval prior to any closure operations. Within 90 days of unit and/or facility closure, as built plans signed by a professional engineer shall be forwarded to the Director

Landfill owners and operators shall allow the Director of the Utah Solid and Hazardous Waste Control Board or an authorized representative, including representatives from the local District Health Department, upon representation of credentials, to enter during operating hours and/or inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under this permit.

A record of the inspection may be made by photographic, videotape, electronic or other reasonable means, and a copy of any such record shall be provided to the owner and the operator within a reasonable time.

## **SITE MONITORING**

No permanent monitoring devices are proposed for the Kanab Sanitary Landfill. Landfill gas in closed sections will be monitored as described for active cells in the Preliminary Engineering Report section of this document.

No groundwater monitoring wells, lysimeters, vadose zone equipment or other monitors are planned for this facility. Surface waters in closed portions of the landfill will be evaluated as part of the annual inspection. Monitoring will be limited to identifying situations which promote infiltration.

## **LAND TRANSFERS AND USES**

Plats and a statement of fact concerning the location of any disposal site shall be recorded as part of the record of title with the County Recorder not later than 60 days after certification of closure. Upon recording, proof of the record of filing will be submitted to the Director.

## **POST CLOSURE MAINTENANCE**

Post-closure care of inactive sections of the landfill will consist of maintaining the integrity of the final and vegetative covers. Any areas subject to erosion will be corrected, and appropriate measures will be implemented to identify and eliminate the source. No active or technical devices are proposed for use at the Kanab Sanitary Landfill. Best management practices will be implemented to minimize infiltration and assure the integrity of the run-on/run-off system. Evaluation of the system will be made during the quarterly inspections, and corrective measures, if any, will be implemented. Run-on and run-off from events smaller than the 25-year storm will be controlled.

No leachate collection devices are proposed for the facility. Closed portions of the landfill will be inspected as part of the quarterly reviews performed by the landfill operator. Closed areas will also be inspected as part of the in-depth annual inspection. Any deficiencies will be repaired as soon as practical. For those failures which jeopardize the environmental integrity of the facility or permit the uncontrolled infiltration of significant amounts of moisture, corrective measures will be initiated immediately.

No alternate land use for closed sections has been developed to date. Closed cells will remain under the jurisdiction of the landfill manager. If alternate land use plans are developed, they will be addressed during the permit renewal process, or a separate permit modification may be processed.

## **RESPONSIBLE PARTIES**

The applicant, property owner, and responsible party for the post closure care period is:

Western Kane County Special Service District No. 1

P.O. Box 36

Kanab, UT 84741

Attn: Danny Little

Phone: (435) 644-5645

It should be noted Western Kane County Special Service District County is continually upgrading solid waste management services. Future agreements, potential special service district creation, the extended life of the landfill, and alternate ownership/operation scenarios may require modification of this section of the permit. In addition, the District may contract site operations with private entities. The District will notify the Director of any changes in responsible party status at least 30 days prior to their effective date. Other changes to the information listed will be provided in annual reports and permit renewal documents.



# **Statement of Basis for the Kanab Sanitary Class II Landfill Permit**

## 1. INTRODUCTION

This Statement of Basis provides the rationale of the Director of the Division of Waste Management and Radiation Control for issuing a permit for Kanab Sanitary Class II Landfill. The Director's staff conducted this evaluation to ensure compliance with the applicable Solid Waste Rules. Matt Sullivan wrote this Statement of Basis.

## 1. FACILITY BACKGROUND

### a. Facility Location and History

The Kanab Sanitary Class II Landfill is on the east side of U.S. HWY 89A near the Utah/Arizona state line at 1000 East Kaneplex Drive, Kanab, Utah. It is a Class II landfill and owned by Western Kane County Special Service District #1.

### b. Regulatory History

This is the facility's fourth permit issued. The first permit was issued in the mid-1990s.

## 2. EVALUATION OF THE PERMIT APPLICATION

- a. The permit renewal application DSHW-2021-007004 was received on May 4, 2021. The application was evaluated and determined complete including documentation and information to meet the regulations for Waste Management and Radiation Control.

## 3. JUSTIFICATION FOR ISSUING THE PERMIT

- a. The Director's staff has evaluated the permit application as required by Section 19-6-108 of the Solid and Hazardous Waste Act and R315-301 through 320 of the Solid and Hazardous Waste Rules.

## 4. PUBLIC PARTICIPATION

- a. As required by Utah Administrative Code R315-311-3, the Director provided an initial 30-day public comment period. A public comment period on the DRAFT Permit began October 12, 2021 and ended on November 10, 2021. No comments were received.

## 5. DIRECTOR RESPONSE TO PUBLIC COMMENTS: No comments were received.

**Kanab Sanitary Class II Landfill  
Facility Site Map**  
(North bearing – top of page)

