

Southeast District Office
1500 West Seventh Street
Chanute, KS 66720



Phone: 620-431-2390
Fax: 620-431-1211
www.kdheks.gov

Robert Moser, MD, Secretary

Department of Health & Environment

Sam Brownback, Governor

October 15, 2012

RECEIVED
OCT 16 2012
BUREAU OF WASTE MANAGEMENT

Mr. Dale Oglesby, Mayor
City of Galena
211 West 7th Street
Galena, KS 66739

Re: City of Galena construction and demolition landfill expansion, permit 738, Galena, Cherokee County, KS

Dear Mr. Oglesby:

I am writing to approve the revised operating plan for the subject landfill received at this office on October 11, 2012. The operating plan revision replaces the current operating plan's Sections A through O. Please replace your original operating plan's pages 5 through 14 with the approved revised pages attached.

The City of Galena's cooperation with the waste management program while handling Joplin tornado debris is appreciated. If you have any questions regarding the above comments, please contact me at (620) 431-2390, by cellular telephone at (620) 432-1546, or via e-mail to cbowers@kdheks.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles Bowers". The signature is stylized and slanted.

Charles Bowers, P.E.
Bureau of Waste Management, Chanute

cc: Dennis Degner, BWM, Topeka → Sam Sunderraj → File: CK, 738, PI
David Stutt, BEFS, Chanute → SED File: SW: CK Co., Galena WTM 738
Brian Jordan, Jordan Disposal Service, LLC, 300 N Blackcat Road, Joplin, MO 64801
Mr. Don Cartwright, Jordan Disposal Service, LLC, 300 N Blackcat Road, Joplin, MO 64801
Ms. Renee Charles, City Clerk, City of Galena, 211 West 7th Street, Galena, KS 66739
Mr. Terry Fox, L.G. Trien Environmental Services, P.O. Fox 1507 Pittsburg, KS 66762

File: SW Permits\CK\galena\post permit mod\2012 op plan rev cmnts01.emb.doc



GEOLOGICAL ENGINEERING SOLUTIONS FOR TODAY'S ENVIRONMENTAL CONCERNS
P.O. BOX 1507 • PITTSBURG, KS 66762 • (620) 231-5660 • FAX (620) 231-5661
triad@triad-es.com

ENVIRONMENTAL SERVICES

October 10, 2012

Mr. Charles Bowers
Kansas Dept. of Health & Environment
Bureau of Waste Management
Southeast District Office
1500 W. 7th Street
Chanute, Kansas 66720-9701

RECEIVED
OCT 11 2012
K.D.H.E.
SOUTHEAST DISTRICT

RE: City of Galena C&D Landfill (Permit #0738)
Response to (FOP) Revision Comments.

Dear Mr. Bowers,

On behalf of the City of Galena and Jordan Disposal Service, LLC (Operator); enclosed please find responses to your comments concerning the (FOP) Facility Operating Plan revisions dated October 8, 2012.

1. In Section D, PROCEDURES FOR SCREENING INCOMING WASTE, the last paragraph states, "This requirement does not apply to burrito wrapped waste (reference Section 111.H, below." Because burrito wrapped waste handling has been removed from Section 111.H, please remove this sentence.

Response: Revised as requested.

2. In Section G, PROCEDURES FOR HANDLING APPLIANCES AND ELECTRONIC WATES (E-WASTE) please specifically state that the electronics in question are electronics screened from waste loads and that the electronics will not be allowed to accumulate on site in quantities exceeding 55 pounds. I make this request because some electronics can be classified as a hazardous waste due to lead in the solder, and keeping the on-site amount less than 55 pounds maintains a status where the landfill does not have to notify as a Kansas Small Quantity Generator and obtain an EPA ID number.

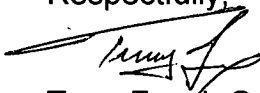
Response: Revised as requested.

3. Please proof read the plan for typographical errors, e.g. "property-lined" (property-line) soils in Section L's second paragraph and "tot eh" (to the) in Section N's fourth paragraph.

Response: The plan has been spell checked and proof read. (We did not find any reference to "property-lined" soils in Section L.

Thank you for your time and continued assistance. If there are any questions, please do not hesitate to call.

Respectfully,

A handwritten signature in black ink, appearing to read "Terry Fox", written over a horizontal line.

Terry Fox, L.G.

cc: Don Cartwright, Jordan Disposal
Dale Oglesby, City of Galena

III. OPERATING PLAN

A. Facility Operating Hours

The landfill is open to the public 7:00 AM through 5:00 PM Monday through Friday. The landfill will be opened the first Saturday of each month from 8:00 AM to 3:30 PM. The landfill will be closed on designated holidays, and during severe weather or when experiencing operational problems. The landfill may be open by appointment if circumstances warrant. The landfill may be open extended hours following a natural disaster in the service area in the future.

B. Waste Origin and Composition

The landfill will accept construction and demolition (C&D) waste as defined by K.S.A. 65-3402(u), from local city and county governments, private contractors, and the general public. The landfill will also accept non-friable asbestos. Liquid waste, municipal solid waste, or hazardous wastes will not be accepted for disposal. KDHE Technical Guidance Document SW-1994-G2-WHITE GOODS STORAGE, RECYCLING AND DISPOSAL should be reviewed for discernment of acceptable wastes. The city may accept appliances and air conditioners for recycling, but only if chlorofluorocarbons have been removed. The technical guidance document is available at the scale house.

During demolition and debris removal following a natural disaster, the wastes accepted may be expanded to include nonhazardous materials mixed with K.S.A. 65-3402(u)'s C&D wastes, e.g., clothing, kitchenware, toys, etc. However, under no circumstances will household hazardous wastes, garbage from any source, tires, electrical wastes, known friable asbestos, or chlorofluorocarbon containing appliances be accepted for disposal with natural disaster wastes. This relaxation of the waste acceptance standards would only apply to wastes associated with the natural disaster.

C. Expected Waste Volume

In the months immediately following the tornado Galena Landfill received over 2,000 tons of debris on some days. Currently, due to continued receipt of Joplin tornado debris the landfill receives 300 to 800 tons per day. This rate is expected to vary day to day until the cleanup is over.

Following the debris removal phase, the landfill is expected to receive less than 50 tons per day.

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The landfill will accept for disposal only "Construction and Demolition Waste" as defined by K.S.A., 65-3402 and amendments thereto. No liquid wastes (K.A.R. 28-29-108) shall be accepted for disposal.

Waste screening will be performed by employees knowledgeable in the process. Drivers will be instructed to perform a visual inspection at the time of loading to provide a general characterization of the waste.

At the landfill, waste loads delivered to the facility will be unloaded at the screening area located adjacent to the active working face of the landfill. The screening area is to be clearly delineated using flags, signs, or markers. The screening area should not exceed 10,000 square feet nor 10 feet in height. In accordance with the regulations, the waste screening area is to be cleaned of waste within 24 hours after the waste is deposited in the screening area.

The operator has the right to refuse any materials prior to unloading. All rejected loads will leave with the hauler for proper disposal at an appropriate facility. In case of a load refusal, the operator is to document the incident with the date and time of refusal, the driver's name, delivery vehicle license number, waste origin, the hauling company's name and address, the load's size or amount rejected, reason for rejection, and the inspector's name. The rejection information is to be kept with the landfill operating record. A copy of the form for the waste load refusal log or non C&D Waste return log is included in Appendix 1.

If any rejected load contains regulated hazardous waste, PCB waste, or medical waste, or if any of these wastes are discovered during the screening process, KDHE (ph 620-431-2390) is to be notified within one business day. The waste type, amount, and source are to be reported.

KDHE Technical Guidance Document SW-23002-G1 should be reviewed for further guidance in conducting the waste screening process.

E. Procedures for Storing and Removing all Non C&D Waste from the Site

Non- C & D wastes other than recyclable materials are not to be accepted and are to be returned to the hauler. If the rejected waste is not returned to the hauler, it will become the Operator's responsibility to dispose of the waste at an appropriate facility.

The rejected waste may be stored on site at a location which does not allow the waste to be comingled with C&D waste, or to be exposed to precipitation or stormwater runoff. Sealed containers are recommended. Roll-off containers with greater than 20 cubic yard capacity may be used, depending on the amount of waste received. Non - C&D waste is to be removed from the facility within seven (7) calendar days (unless waste receipts drop below 1,000 tons per year, in which case waste may be stored on-site for up to 14 days). Non - C&D waste handled and removed from the facility will be recorded in the facility's operating record. The record will include the tonnage of material which left the site as well as the licensed facility the waste was taken to.

F. Description of all Salvaging Operations

Cardboard and scrap metal may be salvaged for recycling. Any collected cardboard is to be retained in a bin or container on site. Recycled scrap metal is to be directed to an independent scrap metal container which is to be located adjacent to the active area but remote from the C&D waste disposal or screening area. The collected cardboard and scrap metal is to be removed from the site on an as-needed basis and shipped for recycling. No other recyclable items are to be salvaged at this facility.

G. Procedures for Handling Appliances and Electronic Wastes (E-Waste)

Only those appliances that have been evacuated and tagged will be accepted for recycling at the landfill. Appliances arriving without tags will be assumed to contain chlorofluorocarbons and will not be accepted. Recycled appliances are to be stored in an independent area. Nor more than 20 appliances are to accumulate on site.

E-waste such as computers, computer monitors, office machines, etc. screened from waste loads are to be separated and retained in a designated area. These items are to be removed on a regular basis for disposal in a permitted facility or recycled. Less than 55 pounds of electronic waste shall be kept on-site at any time.

H. Procedures for Handling Non-Friable Asbestos

The landfill will not accept any friable asbestos containing materials (ACM's). However, as allowed by KDHE Technical Guidance Document SW-9402, and in accordance with EPA/NESHAP demolition practice procedure EPA 34011-92-013; floor tiles, siding, and roofing materials containing non-friable asbestos may be disposed of at the C&D landfill in the following manner.

All non-friable asbestos containing loads will be separated at the demotion site or if mixed; the entire load will be assumed to be handled together as a non-friable asbestos condition. The waste will be wetted prior to loading and transported to the site with a tarp cover. The load will be directed to the operating face, unloaded and handled in a manner so that the materials remain non-friable. Extra handling of the (ACM) asbestos containing material will be minimized. The material will then be covered with either soil or other C&D waste prior to compaction, thereby minimizing further disturbance of the materials.

I. Procedures for Placing and Compacting Waste

After being screened and deemed acceptable, waste is to be incorporated into the working face. The waste is to be incorporated into the working face by pushing the waste to the active face with a bulldozer, compactor or similar piece of equipment. The waste is to be spread uniformly onto the working face and compacted with at least two passes of a bulldozer, compactor or similar piece of equipment. Sequencing of waste disposal has been described in Section III R below. At the present time, spreading and compacting of waste is completed by an independent contractor hired by the city.

J. Safety Procedures for Personnel and Public

Public safety measures to be followed at the site minimize risks to the public who may be unfamiliar with landfill operations and procedures. Safety begins at the entrance gate, as landfill personnel and safety signs advise the public of rules of the landfill. Landfill visitors are required to sign in at the landfill office and to wear required protective equipment, which includes a hard hat and highly visible vest or clothing. Basic driver safety rules include having drivers stay in their vehicles except when

unloading. While unloading, drivers are to remain in the near vicinity of their vehicle. Passengers in the vehicle, and especially children should remain in the vehicle at all times.

Site personnel safety measures includes regular safety training. Safety meetings are to be held with all on-site workers involved with landfill operations. Open discussions outlining concerns, dangers, and procedures for handling emergencies are to be outlined at these meetings. Videos on safety and health related matters may be shown. Meeting notes and outlines should be presented and circulated to all interested parties.

A copy of the General Safety Rules can be found in the Appendix. Any person receiving minor injuries at the site is to be offered treatment from an on site first aid kit. In the event of major injuries, emergency phone numbers are posted at the office/scalehouse. Any injury resulting in offsite treatment of a worker is to be documented.

High visibility clothing and hard hats are to be worn at all times by all workers while on duty at the landfill. Only drivers, while in the working face area, should be allowed to dismount their vehicles when unloading, and only if they are wearing appropriate personal safety equipment. No salvaging of C&D materials is to be allowed by visitors to the site.

K. Cover Application Rate

The landfill operator is to apply one foot of intermediate cover soil over every 2,000 tons of waste received, or every 120 days, whichever is less. Intermediate cover material does not have to be applied more than once per week.

On November 9, 2007, the facility was granted permission to use a 50:50 blend of soil and wood mulch or chips as intermediate cover material.

Clean rubble received at the landfill may be stockpiled in the active phase area and used for intermediate cover when possible. As noted in Section III. H above, non-friable asbestos waste is to be covered with soil or other C&D waste upon disposal and prior to compaction.

L. Procedures for Dust Suppression and Fugitive Emission Control

Water is to be applied to site roads and to the cell area as necessary to control dust. When available, contact water may be used. The contact water is not to be used in a manner that will allow it to enter perimeter ditches, or leave the site. The water is to be applied by a tank trailer or truck mounted tank with a spreader bar. Fugitive emissions of landfill gas are not expected due to the nature of waste accepted, the frequency of cover application, and site topography.

The primary potential source of dust emissions in the landfill is the top deck area and active area of waste placement. These areas are at a higher risk for producing dust due to vehicular and equipment traffic. Exterior landfill slopes are less of a dust control concern as they have intermediate or operational soil covers. Dust emissions from the landfill will be controlled through a variety of dust control methods. Possible dust control methods are identified herein. Dust control methods may be characterized as products and/or applications, covers, and operational methods. Dust control methods for the landfill area include:

- Watering; through the use of one water truck
- Mulching
- Operational and intermediate soil cover
- Modifying the active working area

The operator may use a combination of these dust control methods or any method that is technically sound and approved by KDHE to control dust for the specific site conditions. If the operator intends to use a dust control method not presented above, the proposed dust control method will be evaluated on a case by case basis to assess the effectiveness with specific site conditions. For the purposes of the Plan, operational soil cover will be defined as soil material applied at a suitable thickness to provide dust control. Intermediate soil cover is currently defined as 12 inches of soil material applied to the active area of waste placement. If an area which has received intermediate cover will not receive further wastes for six months or longer, the area shall be seeded in accordance with the seeding specification for final or temporary cover.

During landfill operations, a dust monitoring program will be implemented to evaluate the dust control measure performance and observe the areas for dust emissions. The dust monitoring program consists of performing visual observations of dust prone areas, dust control measures, and monitoring existing and forecasted weather conditions. In addition, dust control will be based on the anticipated traffic. Dust emissions can occur under many conditions. For the purposes of this Plan, dust emissions are characterized as fugitive emissions. This is most likely to occur during windy, dry and hot weather conditions and when the facility receives a large number of trucks. Therefore, the operator will monitor both existing and forecasted weather conditions and use dust control measures suited to the weather conditions and anticipated landfill traffic. The dust control measures shall be implemented prior to the forecasted weather conditions, when traffic conditions warrant. The operator shall monitor the active face and other areas within the landfill limit for fugitive dust emissions. In addition, preventative dust control measures should be observed and documented at least daily when the landfill is in operation to evaluate the dust control measure performance. Additional observations may be necessary as site and weather conditions dictate. Observations will be documented on the monitoring worksheet (Appendix I).

M. Description of Storm Water Control Measures

Storm water is to be diverted around active areas of the landfill using ditched and/or berms as presented on the design drawings (reference Plan Sheet No. 4). The storm water control devices are to be constructed in accordance with the detail presented on Plan Sheet No. 5, and these devices are to be maintained in sufficient condition to exclude run-on from a 25 –year, 24-hour storm event. The active area is defined as any area that has received waste but does not have at least 12 inches of cover.

To divert uphill runoff from entering the active area, a diversion berm should be built to direct runoff around the active area. A minimum 12-inch berm sloped to drain constructed uphill of an active area, and extending a minimum of 30 feet horizontally beyond the edges of the active area will be adequate to divert the runoff from a 25 year, 24 hour storm event. The berm should be constructed in

such a manner that the uphill toe of the berm is not level, but provides a slope to one or both sides so as to not allow ponding on the uphill face of the berm.

C&D contact water runoff is to be minimized by having the screening area sloped towards the working face. Any contact water that does not flow into the working face will be prevented from flowing offsite by a perimeter containment berm. Contact water that does not evaporate or percolate from within the perimeter containment berm may be used to irrigate grasses on closed landfill areas, or may be used for dust control.

Once an active area is filled to grade and has received intermediate or final cover, storm water runoff from this area is to be directed to the perimeter drainage system and way from active areas. The perimeter berm constructed during the active landfill phase will be retained after landfill closure and will become part of the permanent storm water control system. The permanent system has been designated to contain the 25 year, 24 hour rainfall event of 6.8 inches.

Phase 1's perimeter storm water run off control system as presented in the drawings will be constructed prior to Phase 1 expanding beyond the current perimeter berm. The storm water structures for subsequent phases will be concurrent with phase development as presented on the drawings.

If the C&D contact water management system fails, the KDHE is to be notified by the end of the next business day (ph 785/296-1600). If pollutants enter the waters of the state, the KDHE is to be notified immediately.

N. Description of the Facility's Water Supply System

Water from the on site detention basins or Short Creek immediately north of the landfill may be used for fire fighting, irrigation of grasses on closed landfill areas, and dust control. Additional water may be supplied by the City of Galena at nearby fire hydrants as needed with water trucks.

O. Description of Machinery and Equipment

The following equipment currently available for operation of the land during the debris disposal phase. It is anticipated that the amount of equipment will be gradually reduced as the cleanup and disposal comes to an end and the volume of waste received returns more to the pre-tornado amount. Current equipment in January 2012 includes:

Bulldozers	1
Grader	1
Off-road Dump Trucks.....	1
Tracked Excavator	1
Landfill Compactors	1
Water trucks	1

Equipment present at the site may vary with time and disposal volume.

acceptance area, the following certification has been submitted to and approved by KDHE (See also Appendix J):

Certification of Ground Water Investigation – City of Galena C & D Landfill
August 31, 2011

A test pit has been excavated at the site of the proposed "burrito wrap" asbestos containing material disposal area at the City of Galena C & D Landfill (Permit 738).

The test pit was excavated to a depth of 18 feet and no ground water was encountered. The pit remained opened in excess of 24 hours and no groundwater entered the pit. The floor of the ACM disposal area will be at a depth of 12 feet, or six feet above the depth of the test pit.

The location of the proposed ACM area and the elevations of the test pit depth and proposed floor of the disposal pit are shown on the attached drawings.

Certified by:

Thomas L. Moore, P.E.
Tri-State Engineering
Joplin, Missouri

G. Adjacent Property Owners and Land Use

A listing of adjacent property owners has been provided by the City of Galena. This listing is presented in Appendix F and shown on Drawing 2. Property to the north and east is used primarily for agricultural purposes (grazing), and property to the south and west is primarily residential. A reduced Phase 3 buffer (75-ft) between the property line and the Phase 3 cell was approved by the Cherokee County Commissioners at their February 6, 2012 meeting. A copy of the minutes is included in Appendix F.

H. Unstable Areas

The landfill is located in an area which has been extensively undermined (lead and zinc mining). The US Bureau of Mines 1983 Study referenced in Section F provides documentation on the mine shafts and subsidence for the region including this landfill site. This report is available at <http://www.kgs.ku.edu/Publications/OFR/1983/83-2/index.html>

In the 1990's the US Army Corp of Engineers performed extensive shaft and subsidence feature filling in Galena. This shaft filling has helped stabilize the landfill site. The lack of collapses, uncovered voids, or subsidence during the recent operations is evidence of the stabilization. During the intense operations following the Joplin tornado, no unstable conditions were reported in the DWOP area despite the extensive heavy equipment traffic.

Operators did report to KDHE an open mine shaft outside of the DWOP area at the foot of the stormwater berm. The opening of the shaft was likely caused by stormwater pooling at the location and

rotting debris beneath. The potential exists for other abandoned shafts, voids, or adits to be uncovered during landfill development, or subsidence to occur as a result of mine collapse. If any of these conditions occur, the following procedures are to be followed:

1. Any development or landfilling activities in the immediate vicinity are to be halted, and the area is to be secured through fencing, signage or other appropriate methods.

2. KDHE is to be notified within one working day that a shaft or void has been encountered.

3. Depending on the opening's size and nature, KDHE may require an engineering consultant to be contacted to assist in addressing site conditions and developing an appropriate method for remediation.

4. The extent of the sag, void, shaft, or adit is to be investigated through visual inspection (following appropriate safety precautions), drilling, geophysical survey, remote telescoping, or other appropriate investigative methods.

5. The appropriate method to close the mine opening and/or remedy the sag is to be developed based on existing conditions, possible future conditions, impacts on facility operations, potential environmental impacts, and protection of public health and welfare. While no specific remedy can be identified without knowing the extent of the problem, it is anticipated that any exposed shafts, voids, or adits would be plugged with boulders, clean rubble, precast concrete, cast-in-place concrete, or other suitable means. Further it is anticipated sags, subsided areas, or voids would be backfilled with general soil, clean rubble, or gravel fill. On KDHE approval this remediation is to be implemented.

6. A written report is to be submitted to the KDHE which identifies the results of the site investigation and remediation. The report may contain recommendations for additional remediation and facility development and operation plan modifications. Should it be decided, based on potential subsidence issues, or for any other reason that the landfill will not be developed as presented on KDHE-approved drawings, revised drawings will be submitted within 90 days.

OCT 15 2012

TOPEKA, KANSAS

III. OPERATING PLAN

A. Facility Operating Hours

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Only those appliances that have been evacuated and tagged will be accepted for recycling at the landfill. Appliances arriving without tags will be assumed to contain chlorofluorocarbons and will not be accepted. Recycled appliances are to be stored in an independent area. Nor more than 20 appliances are to accumulate on site.

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Site personnel safety measures includes regular safety training. Safety meetings are to be held with all on-site workers involved with landfill operations. Open discussions outlining concerns, dangers, and procedures for handling emergencies are to be outlined at these meetings. Videos on safety and health related matters may be shown. Meeting notes and outlines should be presented and circulated to all interested parties.

A copy of the General Safety Rules can be found in the Appendix. Any person receiving minor injuries at the site is to be offered treatment from an on site first aid kit. In the event of major injuries, emergency phone numbers are posted at the office/scalehouse. Any injury resulting in offsite treatment of a worker is to be documented.

High visibility clothing and hard hats are to be worn at all times by all workers while on duty at the landfill. Only drivers, while in the working face area, should be allowed to dismount their vehicles when unloading, and only if they are wearing appropriate personal safety equipment. No salvaging of C&D materials is to be allowed by visitors to the site.

K. Cover Application Rate

The landfill operator is to apply one foot of intermediate cover soil over every 2,000 tons of waste received, or every 120 days, whichever is less. Intermediate cover material does not have to be applied more than once per week.

On November 9, 2007, the facility was granted permission to use a 50:50 blend of soil and wood mulch or chips as intermediate cover material.

Clean rubble received at the landfill may be stockpiled in the active phase area and used for intermediate cover when possible. As noted in Section III. H above, non-friable asbestos waste is to be covered with soil or other C&D waste upon disposal and prior to compaction.

L. Procedures for Dust Suppression and Fugitive Emission Control

Water is to be applied to site roads and to the cell area as necessary to control dust. When available, contact water may be used. The contact water is not to be used in a manner that will allow it to enter perimeter ditches, or leave the site. The water is to be applied by a tank trailer or truck mounted tank with a spreader bar. Fugitive emissions of landfill gas are not expected due to the nature of waste accepted, the frequency of cover application, and site topography.

The primary potential source of dust emissions in the landfill is the top deck area and active area of waste placement. These areas are at a higher risk for producing dust due to vehicular and equipment traffic. Exterior landfill slopes are less of a dust control concern as they have intermediate or operational soil covers. Dust emissions from the landfill will be controlled through a variety of dust control methods. Possible dust control methods are identified herein. Dust control methods may be characterized as products and/or applications, covers, and operational methods. Dust control methods for the landfill area include:

- Watering; through the use of one water truck
- Mulching
- Operational and intermediate soil cover
- Modifying the active working area

The operator may use a combination of these dust control methods or any method that is technically sound and approved by KDHE to control dust for the specific site conditions. If the operator intends to use a dust control method not presented above, the proposed dust control method will be evaluated on a case by case basis to assess the effectiveness with specific site conditions. For the purposes of the Plan, operational soil cover will be defined as soil material applied at a suitable thickness to provide dust control. Intermediate soil cover is currently defined as 12 inches of soil material applied to the active area of waste placement. If an area which has received intermediate cover will not receive further wastes for six months or longer, the area shall be seeded in accordance with the seeding specification for final or temporary cover.

During landfill operations, a dust monitoring program will be implemented to evaluate the dust control measure performance and observe the areas for dust emissions. The dust monitoring program consists of performing visual observations of dust prone areas, dust control measures, and monitoring existing and forecasted weather conditions. In addition, dust control will be based on the anticipated traffic. Dust emissions can occur under many conditions. For the purposes of this Plan, dust emissions are characterized as fugitive emissions. This is most likely to occur during windy, dry and hot weather conditions and when the facility receives a large number of trucks. Therefore, the operator will monitor both existing and forecasted weather conditions and use dust control measures suited to the weather conditions and anticipated landfill traffic. The dust control measures shall be implemented prior to the forecasted weather conditions, when traffic conditions warrant. The operator shall monitor the active face and other areas within the landfill limit for fugitive dust emissions. In addition, preventative dust control measures should be observed and documented at least daily when the landfill is in operation to evaluate the dust control measure performance. Additional observations may be necessary as site and weather conditions dictate. Observations will be documented on the monitoring worksheet (Appendix I).

M. Description of Storm Water Control Measures

Storm water is to be diverted around active areas of the landfill using ditched and/or berms as presented on the design drawings (reference Plan Sheet No. 4). The storm water control devices are to be constructed in accordance with the detail presented on Plan Sheet No. 5, and these devices are to be maintained in sufficient condition to exclude run-on from a 25-year, 24-hour storm event. The active area is defined as any area that has received waste but does not have at least 12 inches of cover.

To divert uphill runoff from entering the active area, a diversion berm should be built to direct runoff around the active area. A minimum 12-inch berm sloped to drain constructed uphill of an active area, and extending a minimum of 30 feet horizontally beyond the edges of the active area will be adequate to divert the runoff from a 25 year, 24 hour storm event. The berm should be constructed in

such a manner that the uphill toe of the berm is not level, but provides a slope to one or both sides so as to not allow ponding on the uphill face of the berm.

C&D contact water runoff is to be minimized by having the screening area sloped towards the working face. Any contact water that does not flow into the working face will be prevented from flowing offsite by a perimeter containment berm. Contact water that does not evaporate or percolate from within the perimeter containment berm may be used to irrigate grasses on closed landfill areas, or may be used for dust control.

Once an active area is filled to grade and has received intermediate or final cover, storm water runoff from this area is to be directed to the perimeter drainage system and away from active areas. The perimeter berm constructed during the active landfill phase will be retained after landfill closure and will become part of the permanent storm water control system. The permanent system has been designated to contain the 25 year, 24 hour rainfall event of 6.8 inches.

Phase 1's perimeter storm water run off control system as presented in the drawings will be constructed prior to Phase 1 expanding beyond the current perimeter berm. The storm water structures for subsequent phases will be concurrent with phase development as presented on the drawings.

If the C&D contact water management system fails, the KDHE is to be notified by the end of the next business day (ph 785/296-1600). If pollutants enter the waters of the state, the KDHE is to be notified immediately.

N. Description of the Facility's Water Supply System

Water from the on site detention basins or Short Creek immediately north of the landfill may be used for fire fighting, irrigation of grasses on closed landfill areas, and dust control. Additional water may be supplied by the City of Galena at nearby fire hydrants as needed with water trucks.

O. Description of Machinery and Equipment

The following equipment currently available for operation of the land during the debris disposal phase. It is anticipated that the amount of equipment will be gradually reduced as the cleanup and disposal comes to an end and the volume of waste received returns more to the pre-tornado amount. Current equipment in January 2012 includes:

Bulldozers	1
Grader	1
Off-road Dump Trucks.....	1
Tracked Excavator	1
Landfill Compactors	1
Water trucks	1

Equipment present at the site may vary with time and disposal volume.