

# Guideline for Requesting Alternative Cover Material for Active Landfill Units

July 1, 2019

## **Municipal solid waste (MSW) landfills**

Kansas administrative regulation 28-29-108(b)(1) requires 6" of soil material to be placed on all exposed waste at the end of each day of operation. A facility may obtain approval from the Bureau to use alternative daily cover (ADC) materials or procedures if the alternative performs as good or better than the required soil application.

Performance of ADC materials or procedures at MSW landfills will be evaluated by the Bureau in areas outlined by KAR 28-29-108(b)(2):

- Prevention of blowing debris
- Minimization of access to the waste by vectors
- Minimization of the threat of fires at the open face
- Minimization of odors
- Shedding precipitation

Landfill owners or operators must obtain approval from the Bureau prior to use of an alternative material or procedure.

## **Construction and demolition (C&D) landfills**

Kansas administrative regulation 28-29-308(k)(2) requires a minimum of 12" of soil material to be placed over every 2,000 tons of waste or every 120 days, whichever occurs first. A facility may obtain approval from the Bureau to use alternative cover material if it meets the following performance requirements:

- The material is acceptable for disposal in the C&D landfill
- Air intrusion is minimized to control the risk of fire
- Provides litter control
- Limits vector harborage

Landfill owners or operators must obtain approval from the Bureau prior to use of an alternative material or procedure.

## **The request process**

For each material proposed for use as alternative cover, landfill owners or operators shall begin by discussing the material or procedure with their BWM Permit Manager or district staff. If applicable and appropriate, landfill owners and operators should also discuss alternative cover options with their county commissioners.

Second, landfill owners or operators must submit a proposed facility operating plan (FOP) amendment to their BWM Permit manager. The proposed amendment must detail how the facility will effectively prepare, mix, and apply the alternative cover material or procedure. The proposed amendment needs to include but is not limited to information such as:

- A description of the material or materials
- An explanation of the material's ability to meet required performance criteria
- Material mixing ratio
- Equipment used to prepare, transport, and apply the cover
- Techniques for application
- Schedule for application of alternative material and alternating frequency for standard soil cover
- Source of the material and frequency the material will be received
- Procedure for recording dates of alternative material use in the landfill operating record
- Thickness of application
- The plan for cover in the event the alternative material or procedure cannot be used.
- Storage location for material or materials with details on how to keep the materials and equipment working during cold weather and other inclement conditions.

The FOP amendment must be reviewed and approved by the BWM Permit Manager. The proposed FOP amendment may be returned for changes or additional information. The owner or operator may revise or edit the amendment and resubmit for additional review.

Finally, if the FOP amendment is approved by the BWM Permit Manager, the owner or operator must attach a copy of the following documents to their current approved FOP:

- The alternative cover plan amendment to the FOP.
- The written approval document from the Bureau (letter or e-mail)

Approval to use an alternative cover material or procedure may include a trial period. If the alternative cover material is not demonstrated to successfully meet specified requirements, approval to use the material will be cancelled. Landfill owners or operators are encouraged to contact their BWM Permit Manager or district staff to advise BWM on the functionality of the alternate cover material.

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