



THE STATE  
of **ALASKA**  
GOVERNOR MICHAEL J. DUNLEAVY

**Department of Environmental  
Conservation**

DIVISION OF ENVIRONMENTAL HEALTH  
Solid Waste Program

610 University Avenue  
Fairbanks, Alaska 99709-3643  
Main: 907.451.2100  
Fax: 907.451.2188

June 17, 2020

**Certified Mail # 7018 0680 0000 3320 4435**  
**Return Receipt Requested**

Kit Marrs  
Western Alaska Copper and Gold  
PO Box 881  
Talkeetna, AK 99676

RE: Solid Waste Permit No. SWGPCAMP034-23

Dear Mr. Marrs:

The Department of Environmental Conservation (DEC) has evaluated and approves the Western Alaska Copper and Gold's Illinois Creek Camp application to dispose of domestic solid waste under general permit number SWGPCAMP-23. This permit may be used for waste generated at a remote camp or lodge with an average daily population of less than 50 people. For accounting purposes, project number SWGPCAMP034-23 has been assigned to this facility. The Illinois Camp is located in Section 35 of Township 16 South, Range 5 East, Kateel River Meridian at latitude 64.0579°N and longitude 157.8390°W.

This permit replaces general permit number SWGPCAMP-18 and complies with Alaska Statute (AS) 46.03, Administrative Procedures under Title 18, Chapter 15 of the Alaska Administrative Code (18 AAC 15), and the Alaska Solid Waste Regulations under 18 AAC 60. Please review the conditions and stipulations in the permit and ensure that they are understood. The permit expires January 31, 2023, and must be renewed for continued coverage.

Any person who disagrees with this decision may request an adjudicatory hearing in accordance with 18 AAC 15.195 - 18 AAC 15.340 or an informal review by the Division Director in accordance with 18 AAC 15.185. **Informal review requests** must be delivered to the Division Director, DEC, 555 Cordova Street, Anchorage, AK 99501 within 15 days of the permit decision. **Adjudicatory hearing requests** must be delivered to the Commissioner of DEC, 410 Willoughby Avenue, Suite 303, Juneau, Alaska 99801, within 30 days of the permit decision. If a hearing is not requested within 30 days, the right to appeal is waived. More information regarding submitting a request for an informal review or adjudicatory hearing may be found at <http://dec.alaska.gov/commish/review-guidance>. Even if an adjudicatory hearing has been requested and granted, all permit conditions remain in effect unless a stay has been granted.

Please contact Sarah Durand at 907-451-2761 or by email at [sarah.durand@alaska.gov](mailto:sarah.durand@alaska.gov) if you have any questions and to submit annual reports.

Sincerely,

A handwritten signature in blue ink that reads "Douglas Buteyn".

Douglas Buteyn  
Northern/Southeastern Solid Waste Regional Program Manager



STATE OF ALASKA  
DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
555 Cordova Street  
Anchorage, AK 99501

**SOLID WASTE STATEWIDE GENERAL PERMIT  
FOR REMOTE CAMPS AND LODGES  
WITH LESS THAN 50 RESIDENTS**

General Permit No. SWGPCAMP-23

Date Issued: **February 1, 2018**

Date Expires: **January 31, 2023**

The Alaska Department of Environmental Conservation (DEC), under authority of AS 46.03 and 18 AAC 60, issues this general statewide solid waste disposal permit for the operation and maintenance of a landfill for incinerated domestic solid waste, inert waste, and septage. This permit replaces General Permit #SWGPCAMP-18. The following criteria must be met to conduct disposal under this permit:

- Waste must be generated at a remote camp or lodge with an average daily population of less than 50 people;
- Waste must consist solely of incinerated domestic solid waste, inert waste, and septage;
- Annual volume of waste may not exceed 50 cubic yards of ash from domestic waste, 50 cubic yards of inert waste, and 5,000 gallons of septage; and
- The camp or lodge must be:
  - located in a remote area with no year-round access to a major road system (a system of connected roads with a total length of 100 miles or more); or
  - in a location where there is no reasonable access to an existing permitted landfill (all permitted landfills are either not accessible by road from the camp or, if accessible by road, are more than 25 road miles away or have refused, in writing, to accept the waste).

A person who wishes to dispose of waste under the conditions of this general permit must complete the appropriate application form and submit it to DEC. Waste may not be placed in the disposal site until the DEC has approved the application in writing.

This permit is classified as a General Permit for Remote Camps and Lodges with Fewer than 50 Residents, and is subject to the annual fee as listed in 18 AAC 60.700, Table E-4. The first annual fee must be submitted with the permit application. Subsequent annual fees will be billed each calendar year until DEC approves closure of the facility. No application fee is required when renewing an existing permit.

**The permit holder shall manage and operate the facility in accordance with 18 AAC 60 and the permit application materials submitted to, and approved by DEC. In addition, the following conditions are required:**

## **SPECIFIC CONDITIONS**

### **1. Site Preparation**

- a) Construct a disposal pit, trench, or above-grade bermed cell for disposal of ash and inert waste.
- b) Construct a separate trench for disposal of septage.
- c) Ensure the disposal area is designed to protect the waste from damage caused by natural events that could reasonably be expected to occur in the area (i.e., overflow, floods, earthquakes, thawing of unstable permafrost, and freeze-thaw effects).
- d) Ensure a minimum vertical distance of four feet is maintained between the base of the waste disposal cell and septage trench, and the seasonal high groundwater table.
- e) Ensure that disposal sites located within the 100-year flood plain are designed to prevent the exposure or washout of waste and to avoid restricting water flow during any flooding that might occur.
- f) Ensure that solid wastes are not placed in surface waters.
- g) Ensure that the waste disposal cell and septage trench are a minimum of 200 feet from any surface water body or drinking water source. Local law may require a greater separation distance.
- h) Ensure that surface water runoff from outside the facility does not flow onto the facility and over, into, or through wastes. If necessary, construct and maintain diversion structures such as ditches or berms.
- i) Maintain a minimum horizontal separation distance of 50 feet between the disposal cell and the property boundary.

### **2. Facility Operations**

- a) Waste Acceptance - Ensure that only the following materials are deposited in the landfill:
  - i. Ash from burning of domestic solid waste, not to exceed 50 cubic yards annually. Domestic waste includes garbage, food scraps, packaging materials, and any trash associated with normal household operations;
  - ii. Inert waste, not to exceed 50 cubic yards annually. Inert wastes include building debris, scrap metal, and other waste from construction or demolition (C&D); and
  - iii. Septage, not to exceed 5,000 gallons annually. Septage includes liquid and solid human waste removed from a septic tank, cesspool, or portable toilet.
- b) Prohibited Waste – Ensure that all other types of waste, including, but not limited to, liquids (other than septage), batteries, vehicle fluids, oily waste, refrigerants, hazardous waste, or putrescible or food waste that has not been treated by burning or incineration, are properly disposed of in accordance with all applicable laws and regulations.

c) Waste Segregation

- i. All prohibited, hazardous, and non-combustible wastes must be separated from combustible waste.
- ii. Combustible waste must be burned prior to disposal in the landfill.

d) Waste Burning

- i. Combustible waste must be kept dry to the greatest extent possible prior to burning.
- ii. Ensure that all combustible waste is thoroughly burned prior to disposing in the waste area.
- iii. Achieve combustion in an incinerator complying with regulations found in 18 AAC 50, or in a burn box, burn cage, or burn barrel.
- iv. Burning must be contained and controlled at all times. **Open burning on the ground is prohibited.**
- v. Conduct combustion at a site away from the disposal area to prevent accidental combustion of other disposed waste.
- vi. The burn site should be located such that prevailing winds blow away from residences, lodges, or worker areas.
- vii. Ensure adequate burn temperature and ventilation to prevent black smoke and/or smoldering.
- viii. Ensure that all burning is continually monitored by a person on site until burning is completely extinguished.
- ix. Ensure that fires are completely extinguished, and ash has completely cooled prior to placement in the disposal area.
- x. Immediately extinguish all fires that occur in the disposal area.

e) Working Face – Ensure that the working face is kept as small as practical to reduce the potential for windblown litter and the attraction of birds and animals.

f) Cover

- i. During the operating season, consolidate and compact all loose debris and cover with a minimum of six inches of compacted soil at least once each week, or more frequently if needed to prevent windblown ash or litter, or the attraction of animals; and
- ii. At the end of each operating season, cover the wastes with at least twelve inches of compacted soil, and grade the surface to prevent water ponding or accumulation.

- g) Control of Litter - Collect all windblown and littered refuse and return it to the active disposal area for burial at the following minimum frequencies:
  - i. At least once each week from within the disposal site and along the entrance area.
  - ii. At least once each month from any lands within 500 feet of the site, whether windblown or accumulated through unauthorized dumping.

### **3. Septage Disposal**

- a) Ensure septage is placed in a trench that is separate from the area used for disposal of other wastes at the site.
- b) Treat the septage with sufficient amounts of hydrated or quick-lime to raise the pH of the septage to 12, or approximately 25 pounds of lime for each 1,000 gallons of septage.
- c) Cover the treated septage with six inches of soil as soon as the septage has dewatered sufficiently to support the cover material.
- d) At the end of the operating season, ensure there is at least 12 inches of soil cover on the septic trench.

### **4. Monitoring and Reporting**

- a) Visually monitor at the disposal site at least once each month during the operating season and record observations on the monitoring form provided in Appendix A.
- b) Each calendar year, before December 31, submit to DEC a brief report on the current status of the facility using the annual reporting form provided in Appendix B.
- c) Retain copies of all reports, monitoring, and records required by this permit until final closure is approved by DEC.

### **5. Closure and Post Closure Care**

- a) Ensure that final cover is applied within 90 days after the last waste is deposited. Final cover must be placed on both waste disposal areas and septic disposal trenches.
  - i. Final cover must consist of at least two feet of soil.
  - ii. The top six inches of cover must promote successful revegetation of the site.
  - iii. The landfill must be graded and shaped to promote surface water runoff without erosion or ponding, and minimize the amount of water entering the waste.
- b) Implement the approved vegetative cover plan for the closed site within the first growing season, using plant species recommended by the Alaska Plant Material Center (907) 745-4469.

- c) Prepare as-built survey or updated facility record drawings showing the location and boundaries of the waste management area.
- d) Record the as-built survey or updated facility record drawings at the State Recorder's Office or other appropriate land records office approved by DEC, along with a plat note or other file notation that documents:
  - i. That the area was used for waste disposal;
  - ii. The geographical boundaries of the waste management area; and
  - iii. Information about the final cover.
- e) Submit a closure to report to DEC for approval no later than 180 days after final waste is deposited. The report must include:
  - i. An as-built survey or updated facility record drawing showing the boundaries of the waste management area;
  - ii. Documentation of the amount of waste deposited;
  - iii. Evidence that the required notation has been made to the property deed; and
  - iv. Photographic documentation showing the integrity of the final cover.
- f) Post closure care will be required after facility closure is approved if DEC determines that there is a threat to human health or the environment.

## GENERAL CONDITIONS

1. **Access and Inspection** - The Permittee shall allow the Commissioner or representatives access to the permitted facilities at reasonable times to conduct scheduled or unscheduled inspections or tests to determine compliance with this permit, State laws, and regulations.
2. **Information Access** - Except for information relating to confidential processes or methods of manufacture, all records and reports submitted in accordance with the terms of this permit shall be available for public inspection at the State of Alaska, Department of Environmental Conservation, local area office.
3. **Civil and Criminal Liability** - Nothing in this permit shall relieve the Permittee from civil or criminal penalties for noncompliance, whether or not such noncompliance is due to factors beyond his control, including, but not limited to, accidents, equipment breakdowns, or labor disputes.
4. **Availability** - The Permittee shall post or maintain a copy of this permit available to the public at the disposal facility.

5. **Adverse Impact** - The Permittee shall take all necessary means to minimize any adverse impacts to the receiving waters or lands resulting from noncompliance with any limitation specified in this permit, including any additional monitoring needed to determine the nature and impact of the noncomplying activity. The Permittee shall clean up and restore all areas adversely impacted by the noncompliance.
6. **Cultural or Paleontological Resources** - Should cultural or paleontological resources be discovered as a result of this activity, work which would disturb such resources is to be stopped, and the State Historic Preservation Office, Division of Parks and Outdoor Recreation, Department of Natural Resources, is to be notified immediately (907-269-8721).
7. **Other Legal Obligations** - The requirements, duties, and obligations set forth in this permit are in addition to any requirements, duties, or obligations contained in any permit that the Alaska Department of Environmental Conservation or the U.S. Environmental Protection Agency has issued or may issue to the Permittee. This permit does not relieve the Permittee from the duty to obtain any and all necessary permits and to comply with the requirements contained in any such permit or with applicable state and federal laws and regulations. All activities conducted by the Permittee pursuant to the terms of this permit and all plans implemented by the Permittee pursuant to the terms of this permit shall comply with all applicable state and federal laws and regulations.
8. **Pollution Prevention** - In order to prevent and minimize present and future pollution, when making management decisions that affect waste generation, the Permittee shall consider the following order of priority options: waste source reduction; recycling of waste; waste treatment; and waste disposal.

This permit expires on **January 31, 2023**, and may be revoked or amended in accordance with 18 AAC 60.255. The permit can be renewed if the facility will operate beyond this date. To avoid expiration of this permit, a renewal application must be submitted to DEC no later than January 15, 2023.



**Robert J. Blankenburg, P.E.**  
**Solid Waste & Pesticides Program Manager**

## Appendix A: Visual Monitoring Checklist

<b>Facility Name:</b>	
<b>Inspector:</b>	
<b>Date:</b>	

Evaluate each item and check whether acceptable (A) or unacceptable (U). Complete any required information, and make notes on the conditions observed, as well as corrective actions taken.

A	U	Notes
		Is the working face as small as practical to reduce the potential for windblown litter or attractions of birds and animals?  Estimate size of working face: _____ feet long, _____ feet wide, _____ feet high.
		Has cover been applied to prevent escape of waste, windblown litter, or animal attraction within the last week (cover must be applied at least once each week)?
		Signs of damage or potential damage to any portion of the facility, including berms, trenches, ditches, or other structures?
		Signs of erosion?
		Signs of settlement in covered areas?
		Any ponding or accumulation of standing water?
		Signs of leakage or leachate seeping?
		Other signs of instability?
		Litter (at landfill site and within 500 feet)?
		Unauthorized types of waste in <b>or near</b> the disposal site?
		Signs of fire or combustion in the disposal area?
		Any other violations of permit conditions or regulations?
Waste Volume – <b>Estimate</b> how much waste has been deposited in the landfill this month. <div style="text-align: center;">                         Ash: _____ cubic yards                          Non-combustible inert waste: _____ cubic yards                          Septage: _____ gallons                     </div>		



## Appendix B: Annual Reporting Form

Complete the information below, attach the appropriate documents, and submit to the applicable DEC Solid Waste Program project manager.

<b>Facility Name:</b>	
<b>Inspector:</b>	
<b>Date:</b>	

Notes
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Waste Volume – **Calculate** how much waste has been deposited in the landfill this year. Use monthly totals to calculate the annual estimate.

Ash: \_\_\_\_\_ cubic yards

Non-combustible inert waste: \_\_\_\_\_ cubic yards

Septage: \_\_\_\_\_ gallons

Have any repairs been made to the landfill, either waste disposal area, or septage disposal trenches?

Waste disposal area:

Septage trenches:

Has windblown litter been collected and properly disposed of in landfill (i.e. periodic cleanup of area around the landfill)?

Update the site plan to show the boundaries of the waste management area. Attach the updated site plan to the annual report.

Updated site plan attached? \_\_\_\_ yes \_\_\_\_ no

If no, explain why:

Attach copies of all previous monthly inspection reports.

Monthly reports attached? \_\_\_\_ yes \_\_\_\_ no

If no, explain why:

Any other issues regarding the landfill that need to be addressed with DEC: