Recology
WASTE ZERO

September 27, 2010

Steven Siegel
Habitat Staff Specialist
Nevada Department of Wildlife
1100 Valley Road
Reno, NV 89512

Re: Jungo Landfill Site

Dear Mr. Siegel,

This letter is in response to your communication dated April 2, 2010 to Eric Noack of NDEP and a follow-up to our communication to you dated August 20, 2010. In our August 2010 communication, I provided to you a copy of Jungo Land & Investment, Inc.'s ("Jungo") current application for a solid waste operating permit that is on file with NDEP. This letter provides more specific information to the questions presented in your April letter to NDEP. Please note that references to the Plan of Operations are based on the May 2009 revision, and references to the Design Report are based on the April 2010 revision.

Your questions and our responses are as follows:

- *What is the proposed project plan for construction and operation?*

The Report of Design and Plan of Operations, provided to you on August 20, 2010, outline in detail the plan for construction and operation of the Jungo Disposal Site. These were submitted to NDEP with Jungo's permit application on April 2, 2008.

In sum, the Jungo Disposal Site will serve as a regional disposal site which is served by rail. The site will accept only solid waste (Plan of Operations, Sec. 6.0). The overall landfill footprint will encompass 562 acres on a property totaling 634 acres (Report of Design, Sec. 1.0). The landfill disposal boundary will be setback from the property boundary (100 feet from the south, west and east property boundaries, and 200-300 feet from the north property boundary) (Report of Design, Sec. 2.2.2). The landfill will be developed with 10 modules measuring approximately 56 acres each in area, where each module will contain a sump to collect and remove leachate (Report of Design, Sec. 2.2.2).

The site will be developed in phases consisting of the construction of approximately 20-30 acres of base liner, which will minimize the amount of disturbed area at any given time (Report of Design, Sec. 2.2.2). This design and operations plan reduces stormwater run-off from the site

(Report of Design, Sec. 2.3.4.4, 2.3.5.5, Plan of Operations, Sec. 11.0). The landfill will also be closed in phases as it is developed (Report of Design, Sec. 2.2.2).

The Jungo Disposal Site will be operated as a Class I solid waste disposal landfill (Report of Design, Sec. 1.1). The site will be capable of operating 7 days per week, 24 hours a day; however, peak hours of activity will be associated with the arrival of a unit waste train (Report of Design, Sec. 1.1).

The site will be operated in a manner which does not create odors, unsightliness, or other nuisances (Plan of Operations, Sec. 9.0). The working face is kept as narrow as possible while maintaining safe and efficient operation (Plan of Operations, Sec. 9.0). Compacted soil or Alternate Daily Cover is used to cover all solid waste to control disease, vectors, fires, odors, blowing litter and scavenging (Plan of Operations, Sec. 10.0). Programs to control litter, odor, and dust are in place as part of normal operational practices (Plan of Operations, Sec. 5.0, 8.0, 14.2).

- *Will open water be accessible on site to wildlife? Will it be toxic or hazardous? (wildlife mortality, injury)*

The landfill perimeter will be bounded by a fence located 20-70 feet from the outer limits of the refuse disposal area (Report of Design, Sec. 2.2.2). This will prevent wildlife access to the site. The site is designed to drain rainwater away from the active cell after a rainfall event so that standing water is not allowed to pool on the landfill (Plan of Operations, Sec. 2.3). Controls will be implemented to manage water on-site during site development and operations (Report of Design, Sec. 2.3.4.4, 2.3.5.5, Plan of Operations, Sec. 11.0). These controls include a 4-foot high perimeter berm, and temporary retention basins, ditches and down drains (Report of Design, Sec. 2.3.4.4). A shallow ditch will be located around the perimeter of the landfill within the boundaries of the fence (Report of Design, Sec. 2.3.4.4).

Surface water run-off from active disposal areas will be directed to temporary stormwater basins, where it will be pumped to a temporary lined storage impoundment (Report of Design, Sec. 2.3.5.5). The water is sampled and, if free of waste constituents, will be discharged to the run-on/run- off control basin (Report of Design, Sec. 2.3.5.5). If water is impacted, it is retained until it can be used for dust control over lined areas or evaporated (Report of Design, Sec. 2.3.5.5). Surface water controls will also be installed as part of the final cover system (Report of Design, Sec. 2.3.5.5). In addition to the above, the site will utilize a number of vector controls as part of regular operating practice (Plan of Operations, Sec. 8.0).

- *If water will be ponded on site, an industrial pond permit may be required. (permitting)*

The site is designed to drain rainwater away from active cell after a rainfall event so that standing water is not allowed to pool on the landfill (Plan of Operations, Sec. 2.3). As a result, no industrial pond permit is required.

- *Will wildlife be able to access the operational areas of the landfill? What kind of exclusion fencing is proposed for the site? (wildlife mortality, injury)*

The landfill perimeter will be bounded by a fence located 20-70 feet from the outer limits of the refuse disposal area (Report of Design, Sec. 2.2.2). Landfill staff will regularly inspect the perimeter fence and repair, if necessary. In addition, the working area will be kept as narrow as possible and will be covered whenever there is more than a 24-hour period between waste disposal operations. (Plan of Operations, Sec. 9.0, 10.0). The site will utilize a number of vector controls as part of regular operating practice (Plan of Operations, Sec. 8.0).

- *Will the refuse be capped nightly? (wildlife injury, hazards, attractant)*

Since the Jungo Disposal Site is served by rail and will not operate on a set schedule, a minimum of 6 inches of cover material will be applied to the active area whenever there is a period of over 24 hours between waste disposal operations (Plan of Operations, Sec. 10).

- *Will native vegetation be removed from the site to allow for construction of the proposed project? (habitat loss)*

Construction of the site will occur in phases (Report of Design, Sec. 2.2.2). In addition, the landfill will be closed in phases as the site is developed (Report of Design, Sec. 2.2.2). As part of closure, the final site face will be revegetated with desert grasses suitable for non-irrigated areas of Desert Basin (Report of Design, Sec. 2.3.5.2).

- *Will the disturbed operational areas be a source of weedy plant species that could spread to adjacent intact native vegetation? (habitat loss)*

It is not anticipated that the operational areas will be a source of weedy plant species.

- *Will the site be a potential source for range fires? (habitat loss)*

Operation practices are in place to reduce fire dangers. These include the use of daily, intermediate and final cover, prohibition of open burning at the site, and a fire control program (Plan of Operations, Sec. 4.0, 13.0).

- *Will noise, lights, odors, smoke or other operational issues be generated at the site? (disturbance or attractant)*

The Jungo Disposal Site will be operated in a manner which does not create odors, unsightliness, or other nuisances (Plan of Operations, Sec. 9.0). The working face is kept as narrow as possible while maintaining safe and efficient operation (Plan of Operations, Sec. 9.0). Compacted soil or Alternate Daily Cover is used to cover all solid waste to control disease, vectors, fires, odors, blowing litter and scavenging (Plan of Operations, Sec. 10.0). Programs to control litter, odor, and dust are in place as part of normal operational practices (Plan of Operations, Sec. 5.0, 8.0, 14.2). At Jungo's sister landfill in Lincoln County operated by another Recology subsidiary, NDEP's recent inspection resulted in an "excellent" rating for litter control. Noises generated at the site are typical of those associated with intermodal facilities and landfill operations. All lighting on site will be downshielded to comply with the dark skies requirement of Jungo's Conditional Use Permit from Humboldt County. Jungo does not anticipate smoke being generated on site.

- *Will there be any site discharges? (wildlife hazards)*

The site is designed with a double liner containment system to prevent discharge to subsoils (Report of Design, Sec. 2.3). Additionally, the landfill will use environmental controls to minimize leachate head on the liner and to collect and dispose of landfill gas according to the air quality operating permit issued by NDEP (Report of Design, Sec. 2.3, 2.3.2, 2.3.3, Class 1 Air Quality Permit to Construct). Drainage controls will be implemented to control surface water run-on and run-off (Report of Design Sec. 2.3.4.4, 2.3.5.5, Plan of Operations, Sec. 11).

- *How will windblown debris from the site be contained? (plastic bags and other debris = entrapment, injury)*

Litter control measures will be implemented at the site to prevent and control scattering of debris. These measures include daily compaction and covering of waste, temporary litter fences, use of site attendants to pick up litter, proper training and awareness of weather conditions (Plan of Operations, Sec. 5.0). At Jungo's sister landfill in Lincoln County operated by another Recology subsidiary, NDEP's recent inspection resulted in an "excellent" rating for litter control.

- *Will there be a plan to restrict access to the site by birds, rodents and scavenger species (use by rodents, ravens, vultures, gulls and other birds, coyotes, skunks...) that could go under, through or over fencing?*

Vector control and prevention will be in place as part of operations at the Jungo Disposal Site. The compaction and regular cover of wastes are the most effective technique to control vectors.

If necessary, rodent populations may be controlled by the use of poisons, traps, smoke devices or sonar techniques. Avian populations may be scared from the site with the use of noise cannons, falcon deterrents, or other effective means. Insect populations are controlled by minimizing standing water, restricting liquid wastes accepted at the landfill, and the use of approved insecticidal sprays (Plan of Operations, Sec. 8.0). In addition, fences will be inspected regularly and promptly repaired if needed.

If you have any questions or need any additional information, please feel free to contact me at (415) 875-1245 or by email at emerrill@recology.com.

Very truly yours,

Erin Merrill
Environmental Planning Manager

cc: Jon Taylor, NDEP
John Frankovich, McDonald Carano Wilson
Ken Haskell, Golder Associates

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