



June 27, 2011

Mr. Mark Freese
Supervisory Habitat Biologist
Nevada Department of Wildlife
1100 Valley Road
Reno, NV 89512

Re: Response to NDOW Comments to the Jungo Disposal Site

Dear Mr. Freese:

This letter is in response to your comments to the application for the Jungo Disposal Site in your correspondence dated April 22, 2011. In response to your comments, the following areas in the Report of Design and Plan of Operations have been revised:

- Section 2.3.5.5 of the Report of Design has been revised to indicate that if wildlife toxicity risks are present in the sampling results from the water impoundments, then an Industrial Artificial Pond Permit will be obtained.
- Section 7.0 and Section 13.3 of the Plan of Operations have been revised to discuss fencing in accordance with NDOW's recommendation, and the implementation of a wildlife monitoring log during the first year of operations.
- A Final Cover Revegetation Plan has been prepared and included as Appendix L to the Report of Design.
- A Weed Management Plan has been prepared and included as Appendix E to the Plan of Operations.

A copy of the revisions are attached.

Thank you for your time and input on this project. We appreciate your willingness to meet and discuss your comments, and availability to review and comment on the draft documents. Please do not hesitate to contact me at (415) 875-1245 or by email at

Mr. Mark Freese
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emerrill@recology.com if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Erin Merrill". The signature is fluid and cursive, with a large initial "E" and "M".

Erin Merrill
Environmental Planning Manager

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

The factor of safety for static conditions is calculated to be 1.7 (*Appendix F*). The results for the design seismic loading conditions indicate seismically induced permanent displacements of less than 4-inches. Based on current engineering practice, a maximum allowable seismically induced permanent displacement of 6 to 12 inches is acceptable for modern, geosynthetic landfill covers located in a seismic impact zone.

2.3.5.5 *Surface Water Controls*

Surface water controls will be installed on the final cover system to control surface water run-off and minimize erosion of the cover system. Drawing 7 illustrates a conceptual surface water drainage plan for the Jungo Disposal Site at closure. Surface water will be controlled by ditches on the slope benches, berms on the top-deck of the landfill, and down-drains along the side-slopes. All surface water controls are sized to accommodate the 25-year, 24-hour storm event (NAC 444.6885).

During site development, surface water will be managed as follows:

- Surface water run-off from active disposal areas will be directed to the interior sides of the landfill to temporary stormwater basins where it will be pumped to a temporary, lined, storage impoundment. The water will be sampled from the lined impoundment, and if free of waste constituents, it will be discharged to a run-on/run-off control basin where the water will be stored until it evaporates or infiltrates into the subsurface soils. A copy of the sampling results will be provided to the Nevada Department of Wildlife for review. If the water is impacted, it will be retained in the pond until it can be used as dust control over lined areas of the landfill footprint and/or evaporated within the basin.
- Surface water run-off from the permanent exterior slopes will be directed to a broad (28- to 30-foot wide), shallow perimeter ditch. The ditch ranges from 2 to 6 feet in depth and drains gradually to a stormwater run-on/run-off control basin where the water will evaporate or infiltrate into the subsurface soils.

Drawings 10 through 14 illustrate the above basin controls. For illustration purposes, the temporary lined basin and run-on/run-off control basin are shown in the southwest corner near the end of site development. During initial development these basins may be temporarily located closer the disposal operations and then relocated periodically in a southwesterly direction as the site development progresses. At closure, the liner for the temporary lined basin will be removed and disposed of in the landfill and then basin regarded to incorporate it as part of the final run-on/run-off control basin.

If ongoing sampling of the surface water from the temporary, lined basin indicates that the site operations are managed such that surface water consistently is not impacted by waste constituents, then JLII will propose, for NDEP's review and approval, the reduction of the frequency of sampling and testing or the elimination of the sampling and testing.

In the event that surface water in the temporary basin is impacted by waste constituents, JLII will investigate and evaluate the source(s) of the impacts. This will include, but not limited to, identifying and promptly repairing any erosion rills that expose refuse and allow contact between refuse and surface water and/or leachate seeps that may be commingling with surface water. If the Nevada Department of Wildlife determines that water impoundments may lead to wildlife mortality then an Industrial Artificial Pond Permit (IAPP) will be obtained. The temporary basin will be designed to accommodate a minimum 25-year, 24 hour storm event (1.62-inches).

At final build-out, the surface water run-off from the 25-year, 24 hour storm event is estimated to be 22 acre feet. The storage capacity of the final run-on/run-off control basin and perimeter ditches is

7.0 VECTOR CONTROLS (NAC 444.6678, NAC 444.694)

Vector control and prevention at the Jungo Disposal Site will be accomplished using techniques which provide for the protection of public health and safety and the environment in accordance with NAC 444.6678 and NAC 444.694. The daily application of cover material is the most effective technique used to control vectors; however, any highly putrescible waste accepted at the landfill will be placed in a separate trench or area and covered immediately. Waste disposal operations will occur when a trainload of waste containers is delivered to the site. Consequently, the Jungo Disposal Site will not operate on a set schedule. Instead, the site will operate when needed in order to unload a train within a period of time allotted by the Union Pacific Railroad to meet the terms of the transportation agreement with the railroad. It is anticipated that from the point of train arrival to waste placement, compaction and covering in the landfill will be approximately ten hours, if no extraordinary circumstance are encountered.

“Daily” application of cover material (i.e. during every 24 hour period), therefore, may not be appropriate. Alternatively, Jungo Disposal Site will apply cover material for vector control purposes whenever there is more than a 24-hour period between waste disposal operations. When applied, cover material will be a minimum of six inches thick. This is designed to minimize the exposure of wastes to potential disease vectors by reducing available air space, food sources, and nesting locations. 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 breeding areas may develop in and around stagnant water left from dust control activities or occasional rain showers and will be addressed as discovered. The uniform grading of fill surfaces and construction of a drainage control system will minimize the presence of standing water at the landfill. The accumulation of fluids in the waste mass is minimized by the restriction of liquid wastes accepted at the landfill. If insect infestations occur in spite of these measures, approved insecticidal sprays will be used.

Due to operational practices, such as the covering of the waste in the active area, working in an active area that is kept as narrow as possible while still allowing safe operations, and good housekeeping procedures, it is not anticipated that wildlife will access the active working face. In addition, the site will be surrounded by a perimeter fence that is a minimum of 4 feet high, and either of woven or mesh wire with not greater than 2 inch mesh on the bottom 2 feet and a maximum of 8 inch mesh on the top, with the bottom buried or placed tight to the ground, or a cyclone/chain link fence placed tight to the ground. The fences will be inspected and maintained to preclude wildlife access. During the first year of operations, a monitoring log will be kept onsite indicating, to the best of the operator or employee’s ability, avian and terrestrial wildlife access near the active working face of the landfill. A copy of this monitoring log will be provided to the Nevada Department of Wildlife on a quarterly basis during that first year of operations.

13.0 MISCELLANEOUS REQUIREMENTS FOR OPERATION

Several miscellaneous operational requirements for a Class I solid waste disposal landfill are specified by NAC 444.690, 444.696, 444.698, 444.700, and 444.702. Procedures for compliance with these provisions at the Jungo Disposal Site are outlined below.

13.1 Signs

Signs posted at the landfill will convey specific information, including the name of the owner and operator of the site, hours of operation, and types of material accepted or excluded, and fees charged. Directional signs will be located throughout the site providing direction to the appropriate disposal areas. This site will not be open to the public.

13.2 Erosion and Dust Control

Completed portions of the landfill will be configured and maintained as described in the closure and postclosure plans. Construction of a graded and compacted final cover and subsequent re-vegetation will help prevent erosion, surface deterioration, and fugitive dust generation. A water truck will be available on-site for dust control and cover material compaction as needed and water will be applied as needed to the landfill access roads, haul roads, and borrow areas. A minimum 10,000-gallon water storage tank will be on-site to facilitate filling of the water truck.

13.3 Access Control

As required by NAC 444.698, access to the Jungo Disposal Site will be controlled as to time of day and those authorized to use the site. A site attendant will be on duty during operating hours to control access. A perimeter fence, specified in Section 7.0 of this Plan of Operations, will surround the current disposal area and a locking gate will be installed across the entrance road to the landfill. The fence and locking gate will prevent entry and illegal dumping by unauthorized vehicular traffic.

During inclement weather, on site equipment will be used to clear on-site access roads if required.

13.4 Personnel Facilities

A prefabricated administrative building will be available to site personnel. Portable toilets will be located onsite as needed. Bottled drinking water will be available in the administrative building. In addition, a satellite phone will be provided to the site attendant for outside communications.

13.5 Miscellaneous Requirements

NAC 444.702 mandates several additional operational requirements. The procedures, which will be employed to maintain compliance with these requirements, are described below.

- Scavenging - Scavenging will be prohibited in all areas of the landfill. This provision will be enforced through the use of access control measures and perimeter fencing.
- Salvaging – Salvaging will be prohibited.
- Daily Inspections - Site personnel will conduct daily site inspections for litter, scattered paper, and other lightweight debris. Recovered waste collected by site laborers will be returned to the disposal area for proper disposal.
- Measuring and Recording - Incoming waste will be weighed on certified scales at the point of origin.

The above cover system provides a low-permeability barrier that has permeability less than or equal to the base liner system. HELP modeling of the cover system indicates that a negligible amount of water will infiltrate through the cover. HELP analyses for the closed conditions are summarized in **Appendix G**.

The Jungo Disposal Site will pursue an alternative Evapotranspirative (ET) final cover design once the landfill is in operation. An ET cover typically consists of 3 to 5 feet of soil that stores infiltration and then releases it through evapotranspiration. Based on Golder's experience with ET covers, the site climate and soil types appear suitable for an effective ET cover system. The alternative ET cover design will include supporting soil laboratory testing and unsaturated flow modeling. If the modeling results indicate that ET cover is equivalent or superior to the prescriptive cover system, then a field trial will be constructed on portions of the landfill that have achieved final grades. A work plan detailing the laboratory testing, modeling, and field trial program will be prepared and submitted to NDEP for review and approval.

2.3.5.1 Final Cover Grading

Figure 12 shows the final cover grades for Jungo Disposal Site landfill. The final cover grades reach a maximum elevation of 4,172 feet mean sea level (msl) and maintain a maximum side-slope inclination of 4H:1V (horizontal to vertical). To facilitate drainage and minimize erosion, 25-foot wide benches are incorporated into the side-slopes a maximum of every 50 feet vertically. The top surface will be graded at 5 percent to accommodate postclosure refuse settlements and maintain positive drainage.

2.3.5.2 Erosion

Final landfill slopes will be inclined no steeper than 4H:1V. Minimum final surface slopes will be 5 percent. To mitigate potential wind and water erosion, the vegetative layer thickness was increased from one foot to two feet.

As part of the closure activities, the integrity of the final site face will be maintained by the placement of a vegetative layer to provide erosion control. A Revegetation Plan is attached to this Report of Design in Appendix L.

A surface water erosion analysis was completed for the slopes using the Revised Universal Soil Loss Equation program, RUSLE Version 1.06 (United States Office of Surface Mining and Reclamation, 1998). The analysis conservatively assumes that the cover is poorly vegetated although the cover will be properly vegetated with suitable desert grasses. The results of the conservative analyses indicate an estimated maximum soil loss for the proposed final grades of 0.03 inches/year which is less than an average of approximately 1-inch over a 30 year postclosure period. The surface water erosion soil loss analysis is presented in **Appendix H**.

Wind erosion was also evaluated for the Jungo Disposal Site. Golder consulted with wind erosion specialists working for the United States Department of Agriculture, Natural Resource Conservation Service (NRCS), Wind Research Unit. Because of the complexity of wind erosion calculations, which were primarily developed for agricultural applications, NRCS staff recommended the use of Single-Event Wind Erosion Evaluation Program (SWEEP, Ver. 1), which is a part of the Wind Erosion Prediction System (WEPS). WEPS is a process-based, continuous, daily time-step model that simulates weather, field conditions, and erosion.

**Final Cover Revegetation Plan
Jungo Disposal Site**

Prepared for:

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June 2011

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1.0 Introduction

The purpose of this Final Cover Revegetation Plan is to provide guidance and direction on obtaining permanent stabilization upon final closure of a landfill cell. The recommendations should be implemented in conjunction with the Final Closure Plan, which will be prepared approximately two years prior to closure of a landfill cell.

2.0 Revegetation Preparation and Implementation

2.1 SITE PREPARATION AND GRADING

Prior to initiating revegetation work, the growth media (e.g., soil) will be tested by a credible lab to determine the suitability of the proposed media to support native Great Basin scrub vegetation. The sample will be taken from the soil that will form the final cover that will be revegetated. The soils samples will be taken within six months of revegetation.

Prior to initial ground disturbance for the landfill, existing percent vegetation coverage on site will be measured by a qualified professional. Three random locations will be measured using the line-point interception method (Herrick, et al, 2009) or other equivalent method.

All finished slopes where vegetation will occur will be de-compacted using rippers or tines to loosen soils, so that final compaction within the first 6 inches is not greater than 85% of maximum compaction. Additionally, prior to seeding, the soil surface will be roughened by track walking or imprinting perpendicular to the prevailing winds.

Best Management Practices (BMPs) will be implemented during site preparation and revegetation to control wind- and water-borne erosion such as straw, mulch, tackifier, and possibly snow fencing. The *Nevada Contractor's Field Guide for Construction Site Best Management Practices*, June 2008 should be referenced for appropriate BMPs.

2.1.1 Noxious Weed Abatement for Revegetation

A Noxious Weed Abatement Plan specific to revegetation of the final cover will be prepared prior to revegetation work as part of the Jungo Disposal Site's Final Closure Plan. A separate Weed Management Plan for operations at the site has been prepared and is part of the site's Plan of Operations. The Noxious Weed Abatement Plan for revegetation activities will identify the boundaries of the specific revegetation work to be completed.

As part of the revegetation work, noxious weeds will be controlled. At a minimum, inspections of the revegetation area will be performed during the growing season following revegetation for occurrence of noxious weeds. Control and abatement, at a minimum, will consist of mechanical treatment (e.g., pruning and removal of vegetation and dead material) in combination with approved herbicide applications or Integrated Pest Management methods. The UNR Extension Service is a source of information.

2.2 MATERIALS

2.2.1 Seed

The seed used for final cover revegetation will conform with all laws and regulations pertaining to the sale and shipment of seed required by the Nevada State Department of Agriculture and the Federal Seed Act. All shipments of seed will be reported to the Nevada State Department of Agriculture for inspection. Seeds delivered to the site will be tagged and labeled in accordance with the State Agricultural Code.

Seed will be of a quality having a minimum Pure Live Seed ("PLS") as specified. Weed seed will not exceed 0.25% of the pure live seed and inert material. Individual seed test results, by species and lot number, will be provided 30 days prior to commencing the work, prior to acceptance, and before seed is blended. Weed seed will not exceed 0.25% of the pure live seed specified and shall not include any seed of cheatgrass (*Bromus tectorum*) or Sweet clovers (*Melilotus officinalis*, *M. alba*). Crop seed shall not exceed 1%. The seed will be rejected if other undesirable species are present in excessive quantities. All seed tags and lab tests will reflect the most recent test date.

Seed tags must show the following information:

- Scientific name
- Common name
- Lot number
- Percent purity
- Percent germination, including hard and dormant seed
- Percent weed seed
- Origin

Table 1 shows the proposed seed mix to use for revegetation. In the event that there are any changes to the species and/or varieties, Nevada Department of Wildlife will be notified.

FINAL COVER REVEGETATION PLAN

JUNGO DISPOSAL SITE

Revegetation Preparation and Implementation

June 24, 2011

Table 1. Revegetation Seed Mix

Botanical Name	Common Name/Variety	PLS lbs/acre
<i>Achnatherum hymenoides</i>	Indian ricegrass	2.00
<i>Agropyron fragile</i>	Siberian wheatgrass	3.00
<i>Atriplex canescens</i>	Four-wing saltbrush	4.00
<i>Atriplex confertifolia</i>	Shadscale saltbrush	2.00
<i>Distichlis stritcus</i>	Saltgrass	2.00
<i>Elymus elymoides</i>	Squirreltail	3.00
<i>Grayia spinosa</i>	Spiny hopsage	2.00
<i>Sarcobatus vermiculatus</i>	Greasewood	2.00
<i>Spharalcea grossularia</i>	Globemallow	0.25
TOTAL		20.25

2.2.2 Soil Medium

Topsoil that is excavated during landfill construction will be stockpiled and maintained separately to ensure that it is not mixed with subsoil horizons. The stockpiled topsoil may be temporarily vegetated to minimize the potential of erosion, and monitored and treated for weeds while it is stockpiled. Maintaining the stockpiled topsoil will be important for ensuring revegetation success.

2.2.3 Soil Amendments

Soil amendments may be added to provide a suitable growth media. The soil amendments must be in an organic slow-release form compatible with native vegetation establishment. The appropriate soil amendment will be identified upon completion of the soil testing.

2.2.4 Soil Inoculants

Soil inoculants are bacteria or fungi that can be added to the soil to improve plant growth. Although not required, the use of soil inoculants may be considered. Mycorrhizal inoculants consist of spores, mycelium, and mycorrhizal root fragments in a solid carrier suitable for handling in dry applications. The carrier must be the material in which the inoculum was originally produced and may include organic materials, vermiculite, perlite, calcined clay or other approved materials consistent with proper application, and good plant growth.

Each endomycorrhizal inoculum will carry a supplier’s guarantee of number of propagules per unit weigh or volume of bulk material. Inoculum shall contain *Glomus intraradices*, G.

deserticola, and *G. etunicatum* and have a propagule count of 120 per gram of which a minimum of 20 spores per gram present at random tested sampling. The product should be AM – 120-3 or equal or the most current quality product available and should be applied at 60 lbs/acre.

A representative 100 gram sample (from a re-mixed bag in order to obtain a homogeneous sample) will be drawn from the inoculant bags. This sample will be submitted to an authorized laboratory thirty days prior to application for verification of spore count.

If the inoculant spore-density is below specified counts, additional material will be supplied to meet specifications. Inocula will be transported and stored in areas with a temperature of less than 90 degrees Fahrenheit. A dust mask should be used when handling the material.

2.2.5 Mulch

Mulch may be used as a protective cover placed over the soil to retain moisture, reduce erosion, enhance germination, and reduce weed growth. Some typical forms of mulch include recycled paper, straw, and wood fiber. All mulch must be free from weeds or other foreign matter toxic to seed germination. Recycled paper mulch consists of degradable green-dyed, 100%-recycled paper products, produced from newsprint, chipboard, corrugated cardboard, or a combination of these materials.

2.2.6 Tackifier

Tackifiers are chemical compounds used in formulating adhesives to increase the adherence of a mulch to the soil surface. Tackifier should be an organic, plant-derived substance containing psyllium, guar gum, or cornstarch such as PT-TAC, Reclamare 2400, Ecology M-Binder, Eco-tak, FischStick or approved equal. Material shall form a transparent 3-dimensional film-like crust permeable to water and air and containing no agents toxic to seed germination.

2.3 IMPLEMENTATION

Revegetation work should take place in late spring or the fall, following the onset of plant dormancy.

2.3.1 Soil Sampling and Testing

A qualified professional familiar with soils sampling, handling, and analysis shall oversee or conduct the soil sampling. Since the landfill will be constructed and closed in phases, each landfill cell will require its own sample(s) and analysis. Parameters to be tested include at minimum the following:

Saturation percent, Soil Texture, Infiltration Rate, pH, Conductivity, Total Dissolved Salts, Cation Exchange Capacity, Potassium, Sodium, Calcium, Magnesium, Nitrate & Phosphate, Sulfate, Chloride, Boron, Sulfur or Lime Requirement, Gypsum Requirement, Sodium Absorption Ratio, Exchangeable Sodium Percent, Organic Matter.

In the event that the proposed growth media is not suitable to support the species in the Revegetation Mix, a qualified professional will be consulted to provide proposed amendments.

2.3.2 Noxious Weed Control

The Noxious Weed Abatement Plan protocol will be followed as discussed in Section 2.1.1 above.

2.3.3 Seed Bed Preparation

Any existing strands of native vegetation need to be protected. Slopes will be track walked up and down the slope or imprinted perpendicular to the slope(s) and prevailing wind direction. Final surfaces shall be non-uniform and rough.

2.3.4 Application of Soil Inoculants

In the event that inoculants are used, a dust mask must be used when handling inoculants. Inoculants will be applied by hand broadcasting or with hydraulic applications. If hand broadcasting, inoculants will be incorporated by raking.

2.3.5 Seeding

The seed labels will be removed from the seed bags at the time of seeding to verify species in the mix and application rates. Seeding may be accomplished by drilling or hydroseeding. Drilled seed can be used for slopes 3(H):1(V) or less. Tackifier will be applied over drilled seed at the

rates listed below in Section 2.3.6. Alternatively, the seed can be applied using a hydraulic application as listed below in Section 2.3.6.

2.3.6 Hydraulic Applications

Soils must be moist prior to application and applied at the following rate:

<u>Materials</u>	<u>Rate</u>
Seed	As specified
Mulch	2,000 lbs/acre
Tackifier	150 lbs/acre
Water	As needed

A hydroseeder with a paddle wheel agitator may be used to evenly apply the mixture and keep it under suspension.

3.0 Post Implementation

3.1 MAINTENANCE

The revegetated area will be maintained and monitored for three years as part of landfill post closure maintenance following the completion of revegetation work to ensure proper establishment of vegetation and control of erosion. The revegetated area will be maintained to minimize erosion, including sheet erosion, rills, or gullies.

The revegetated area must achieve 70% desirable vegetation (i.e. seed mix species or native species that have naturally been recruited) of pre-disturbance native plant cover. Non-desirable weedy species (non-natives) will not exceed 15% of the vegetation community composition three years following revegetation implementation.

The percent of revegetation establishment will be measured annually during the three year monitoring period at a minimum of three random transects using the same methodology as used in the initial vegetation measurement (see Section 2.1). The line-point intercept method (Herrick et al, 2009) or equivalent method will be used. The results from these annual measurements will guide adaptive management techniques such as re-application of seed, soil amendments, mulches, and tackifiers or modification of the seed species composition.

3.2 CONTINGENCY

Supplemental treatments will be required if revegetation efforts are unsatisfactory following completion of work. This re-treatment(s) may include re-application or adjustment of the seed mix, soil amendments, soil inoculants, mulch, and tackifier.

8.0 OPERATION & MAINTENANCE (NAC 444.686)

The Jungo Disposal Site will be operated in a manner, which does not create odors, unsightliness, or other nuisances. The working face will be kept as narrow as possible while maintaining safe and efficient equipment operation. Bulky waste material which may provide for the harborage of rodents will not be used for the final surface of side slopes. Waste will be spread into layers not exceeding two feet in thickness prior to compaction, and compacted using dozers and/or compactors. The equipment will make a minimum of two passes over each waste layer. The perimeter boundary of the extent of waste placement will be at least 100 feet from the property boundary of the site.

Odors from landfill operations will be controlled through the placement of daily, intermediate and final cover. In addition, the narrow working face will act to minimize any odors. In the event that a highly odorous load is received, the odorous material may receive cover more frequently.

The Jungo Disposal Site will monitor for any impacts from weedy plants species as a result of operations. A Weed Management Plan is attached to this Plan of Operations as Appendix E.

Figure 5 presents the Landfill Base Grading Plan for the Jungo Site. **Figure 6** presents the Landfill Final Cover Grading Plan. The Report of Design (Volume I) details the liner and cover systems and also illustrates the proposed sequencing of construction.

Jungo Disposal Site Weed Management Plan

This weed management plan is developed to control the establishment of noxious weeds in and around the disturbed areas of the Jungo Disposal Site. This Weed Management Plan covers prevention, control and treatment of noxious weeds as part of ongoing operations of the facility. A separate noxious weed management plan specific to the revegetation of the final cover will be prepared as part of the Final Closure and Post Closure Maintenance Plan, typically prepared 2 years prior to final closure of part or all of the landfill.

Measures for prevention, inventory, monitoring and treatment during operations of the Jungo Disposal Site are outlined below:

Weed Prevention

The following weed preventions measures will be implemented at the Jungo Disposal Site:

- Monitoring and prompt treatment of weed infestations to minimize establishment and spreading;
- Restrict vehicle traffic to defined roads or overland travel routes to reduce potential transport of weed species;
- Revegetation of previously disturbed areas;
- Use of seed mixes during revegetation activities with weed seed that does not exceed 0.25% of the applicable pure live seed as indicated in the Final Cover Revegetation Plan; and
- Provide training to management and employees on the identification of noxious weeds, importance of weed control and measures to minimize their spread.

Weed Inventory and Monitoring

Prior to construction, a plant survey will be conducted to indicate a baseline inventory. This survey will be performed of the overall project site.

Following the commencement of operations, an inspection will be performed every spring along the following:

- Internal roadways used since the last inspection,
- Current internal roadways,
- The site perimeter fence,
- The active landfill area, and

- Any areas that had been disturbed since the previous survey.

The inspections will consist of walking these areas and identifying any locations of noxious weed infestations within and up to 25 meters from the specified areas.

Treatment methods

If weed species are found, appropriate treatment will take place. These treatments include mechanical controls such as pruning and dead material removal, biological controls, and/or use of approved herbicide applications.