

Golder Associates Inc.
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December 24, 2008

063-7079-100

Nevada Division of Environmental Protection
901 South Stewart Street, Suite 401
Carson City, Nevada 89701

Attention: Mr. Jon Taylor

**RE: RESPONSE TO NDEP COMPLETENESS REVIEW
APPLICATION TO CONSTRUCT AND OPERATE A CLASS II LANDFILL
JUNGO DISPOSAL SITE, HUBMOLDT COUNTY, NEVADA**

Dear Mr. Taylor:

Golder Associates Inc. (Golder) is submitting revised documents for the Application to Construct and Operate the proposed Class II Jungo Disposal Site located in Humboldt County, Nevada. These documents were completed in response to the Nevada Division of Environmental Protection's (NDEP's) completeness review dated April 29, 2008. Specifically, the enclosed documents include the following:

- A letter from Nevada Land and Resource Company (NLRC), dated November 19, 2008 that indicates that it is leasing the property to Jungo Land and Investments, Inc. A Title Report was previously submitted in Appendix A of the Operations Plan that shows NLRC is the current property owner.
- Revised Report of Design. Please replace the text, tables, and figures with the enclosed revised Report of Design documents into Volume I. The appendices remain unchanged. Please note that we have moved the Closure and Postclosure Maintenance Plans and Monitoring Plans from the Report of Design to the Operations Plan based on feedback from NDEP.
- Revised Operations Plan. Please replace the text and figures with the enclosed revised Operations Plan documents into Volume III. In addition insert the new Appendix C (Closure and Postclosure Maintenance Plans) and Appendix D (Monitoring Plan) into Volume III.
- Resume for Mr. Kris Johnson. Mr. Johnson is our hydrogeologist that prepared the Monitoring Plan. Mr. Johnson has more than 18 years of hydrogeology experience at solid waste landfills, including the preparation of monitoring plans.

Table 1 summarizes our resolution to comments provided in NDEP's completeness review.

Please call if you have any questions or require additional information.

Sincerely,

GOLDER ASSOCIATES INC.



Kenneth G. Haskell
Practice Leader/Principal

Enclosures: NLRC Letter
Report of Design Document Inserts
Operations Plan Document Inserts
Resume for Mr. Johnson

TABLE 1
COMMENT RESOLUTION TO NDEP COMPLETENESS REVIEW

Comment Category	Issue	Resolutions
1	NAC 444.677(2)(9) Proof of Ownership	Humboldt County Special Use Permit and NRLC letter confirming lease status with Jungo Land and Investments, Inc.
2	NAC 444.645(2) QA/QC	Report of Design (p.4) summarizes CQA requirements. Table 2 was added that provides the minimum requirements of a CQA Plan. A final CQA Plan will be prepared and submitted with construction plans and specifications for each liner construction project.
3	NAC 444.680 Topography Soil Balance Fencing, equipment shelter etc. Population Area Served Types and Quantities of Waste	<p>Figure 2 of the Report of Design was modified to include regional topography.</p> <p>The “soil borrow” is the soil that will be excavated to create the landfill base grades, and therefore, the soil borrow is within the landfill footprint. The earthworks balance (Table 1) was updated to reflect a net average soil volume expansion.</p> <p>Figure 13 of the Report of Design shows the Site Facilities Plan.</p> <p>The Operations Plan, Section 1.0 (p. 1) expands on the population area that will be served by the Jungo Disposal Site. This is also repeated in the Report of Design.</p> <p>The Operations Plan, Section 6 (p. 10) expands on the types and quantities of wastes that will be accepted.</p>
4	GW Certification	The Monitoring Plan is signed by Mr. Kris Johnson, a highly experienced hydrogeologist that specializes in solid waste landfills. Mr. Johnson’s resume is attached.
5	Liquid Waste	The Operations Plan, Section 6.6 (p.13) includes test procedures for determining whether a waste is classified as a liquid waste.
6	Revegetation	Section 2.3.5.2 indicates that the erosion calculations <i>conservatively assumed</i> poor vegetative cover for purpose of calculating erosion rates. However, this section further clarifies that the cover will be properly vegetated with suitable desert grasses.
7	Facilities Map	The Operations Plan, Section 1.2 (p.2) and Figure 3 shows the site facilities.
8	Operating Records	The Operation Plan, Section 12 (p. 23) indicates that operating records will be kept at the site.
9	Special Wastes	The Operations Plan, Section 6 (pp.10-14) clarifies that special wastes will be limited to C&D wastes, waste tires, waste water treatment sludge (that has been dried) and asbestos containing materials. Waste handling requirements for these materials are also described in this section.

NEVADA LAND AND RESOURCE COMPANY, LLC

3480 GS Richards Blvd., Suite 101 • Carson City, NV 89703 • Tel 775.885.5000 • Fax 775-885-5005

November 19, 2008

Jon Taylor, PE, CEM
Nevada Department of Environmental Protection
Bureau of Waste Management
901 S. Stewart Street, Suite 4001
Carson City, NV 89701

RE: Waste Disposal Lease and Option to Purchase #189110

Dear Mr. Taylor:

Please be advised that Jungo Land and Investments is currently leasing, with an option to purchase, the following property located in Humboldt County, Nevada:

Township 33 North, Range 35 East, MDB&M

Section 7 APN: 05-411-07

The annual lease/option fee has been paid through April 2, 2009.

If you have any questions or require additional information, please call.

Sincerely,



Danielle Bettridge
Administrative Services Manager



REGIONAL PLANNING DEPARTMENT

HUMBOLDT COUNTY COURTHOUSE • WINNEMUCCA, NV 89445
OFFICE (775) 623-6392 FAX (775) 623-6395

April 19, 2007

Don Gambelin
Jungo Land and Investments, Inc.
160 Pacific Avenue, Suite 200
San Francisco, CA 94062

RE: UH-07-05
Solid Waste Disposal Site

Dear Mr. Gambelin:

As you are aware, the Humboldt County Regional Planning Commission at their April 12, 2007 meeting, voted to approve your request for a special use permit application to allow you to operate a long-term solid waste disposal site on property located approximately 25 miles west of Winnemucca in the Desert Valley area off Jungo Road in Section 7, T.35N., R.33E., Humboldt County, Nevada. Assessor's Parcel #06-411-07.

Final approval of this request is subject to the return of the signed, notarized acceptance form enclosed. Upon receipt of the signed and notarized acceptance form, your special use permit shall go into effect.

Should you have any questions concerning the foregoing, please contact our office.

Sincerely,

Sandy Hammargren
Senior Planning Technician

encls

xc: Humboldt County Building Dept
Humboldt County Business License
Nevada Bureau of Air Quality
Humboldt County Road Dept

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ACCEPTANCE FORM

STATE OF Nevada)

COUNTY OF Humboldt)

Case Number: UH-07-05

I, Don Gambelin, dba Jungo Land & Investments, Inc., being duly sworn, depose and say that I am the applicant and/or owner who made application for a **Conditional Use Permit** known as case number **UH-07-05**. I am aware of and accept all of the conditions as made a part of the approval of the above noted case and hereby spelled out below:

1. The applicant shall be responsible for obtaining all necessary permits and licenses, and for providing copies of same to the Planning Department within thirty (30) days of their receipt, or a letter from the appropriate state and/or federal agency that no permit is required. Permits shall include, but are not limited to Humboldt County Business License, Nevada Bureau of Air Quality Air Quality Operating Permit and Surface Area Disturbance Permit.
2. Applicant shall not allow fugitive dust to exceed standards as set forth by Nevada Bureau of Air Quality. A Dust Control Plan shall be delivered to the Planning Department. All roads and ways accessing and within the site shall be maintained in as dust-free a condition as possible. Owner/Operator will maintain and minimize dust conditions on any unimproved roads used regularly by the owner/operators. This Plan shall include how the roadways will be maintained, i.e. the regular application of water, dust palliative or other approved material on applicable roads and ways.
3. A thirty (30) foot setback shall be maintained from all property lines and easements.
4. One sign is allowed for this use, as outlined in the Humboldt County Zoning Ordinance.
5. This Conditional Use Permit shall be subject to an annual review.
6. This Conditional Use Permit approval for a long-term solid waste disposal site is based upon the facts as found within the application. If any changes occur, such as property ownership or a deviation of said use, other than limited uses associated with the activity, the Planning Department shall be notified.
7. The activity for which this Conditional Use Permit is issued (long-term sold waste disposal site) shall commence operations within three (3) years of the date of final approval or become null and void, unless an extension request has been approved by the Regional Planning Commission. The Regional Planning Commission, on its own motion at a public hearing, may revoke a Use Permit for non-compliance with the conditions as set forth in granting the permit. The permittee shall be given written notice at least ten (10) days prior to a public hearing on any proposed revocation.
8. This Conditional Use Permit shall not become effective for any purpose until the applicant has returned to the Humboldt County Planning Department a notarized

affidavit stating that the applicant is aware of and accepts all of the conditions approved as a part of this Conditional Use Permit.

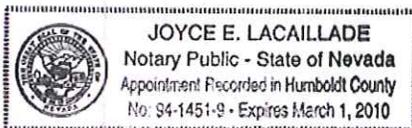
9. There shall be no interference with the peace, contentment or general welfare of the area.
10. Applicant shall check with the State of Nevada to determine if they will be required to obtain water rights for the subject operation to insure services will be available for dust control and sanitary structures that will be required in the operation.
11. Applicant will be allowed structures on the property – as stated in the application. Applicant will be required to supply services to those structures – water and sanitary services. Applicant will meet with the Department of Health and the Humboldt County Building Inspector to address those requirements.
12. Any fuel storage on site will be secured by fencing, an eight-foot high sight-obscuring fence. Entire operation shall be fenced to insure security for the applicant and safety for the adjacent property owners.
13. If traffic to the site becomes greater than 50 vehicles per day, and/or the site begins accepting refuse by truck; the company shall enter into an agreement with Humboldt County, to maintain the portion of the road used with Humboldt County.
14. Applicant will comply with all land reclamation regulations in accordance with local, state and federal requirements.
15. Applicant shall incorporate lighting mitigation measures on the site that follow "dark sky" lighting practices. Such measures include using directional lighting that does not shine up or outward.

Date: 4/23/07

[Signature]

Subscribed and sworn to before me this 23rd day of April, 2007.

[Signature]
Notary Public



Kris H. Johnson, R.G., C.E.G.

Education M.S., Geology, California State University, Hayward, California
B.S., Geology, San Jose State University, San Jose, California

Registrations Registered Geologist, State of California
Certified Engineering Geologist, State of California

Professional

Affiliations Solid Waste Association of North America (SWANA)
Groundwater Resource Associates of California
National Ground Water Association

Professional Experience

2004 to date **Golder Associates Inc.** **Sunnyvale, CA**
Senior Consultant

Mr. Johnson is a senior consultant in Golder's Sunnyvale, California office. Responsible for conducting and managing hydrogeologic and engineering geologic projects for landfill and industrial sites. Responsible for client development, project management and liaison with regulatory agencies. Mr. Johnson has primary expertise in regulatory compliance and water quality issues at solid waste sites, and the implementation of detection monitoring, evaluation monitoring, and corrective actions.

1994 - 2004 **Conor Pacific/Einarson, Fowler & Watson** **Mountain View, CA**
Senior Engineering Geologist

Senior engineering geologist responsible for implementation and management of technical services for a full range of environmental projects. Provided expertise in the evaluation and characterization of groundwater, soil, and landfill gas and acted as liaison for clients with regulatory agencies. Project responsibilities included ongoing water-quality evaluation, design and implementation of geologic and hydrogeologic investigations at solid waste disposal, industrial, and LUFT facilities and subsequent development and negotiation of appropriate remedial solutions.

Specific projects included: a detailed hydrogeologic characterization of a large landfill expansion; development of conceptual and numerical groundwater flow models to evaluate regional and site-specific groundwater flow; evaluation of corrective actions and large-scale groundwater extraction; developed Reasonable Foreseeable Release scenarios and corrective action cost estimates for several municipal landfills; supervised on-going monitoring, reporting and response for numerous solid waste landfills involving statistical evaluation of monitoring data and development of new monitoring and reporting programs for inclusion in waste discharge requirements orders; evaluation of landfill gas impacts to groundwater; supervised the investigation of a half-mile long MTBE groundwater plume in an urban setting.

1990 - 1994 **Pacific Environmental Group, Inc.** **San Jose, CA**
Senior Geologist

Responsible for geologic, hydrogeologic, and geotechnical projects for refinery sites. Provided quality assurance controls of field work and technical reports, logging exploratory borings, design and installation of monitoring wells, design of monitoring systems and plans, and project budgeting and administration. Supervised a team of several staff- and project-level geologists, engineers, and technicians devoted to refinery sites.

Kris H. Johnson, R.G., C.E.G.

Representative project experience included: solid waste management unit investigations, monitoring, and corrective action; hydrocarbon and chemical spill investigations and remediation; operation, maintenance, and verification reporting for several groundwater extraction systems; site-wide monitoring and groundwater control programs; investigation and analysis of slope stability; support for EIR and RCRA facility permitting; mapping, restoration, and monitoring of wetlands; and planning, permitting, and implementation of excavated soil management programs.

1986 - 1990

EMCON Associates

San Jose, CA

Senior Project Geologist

Responsible for conducting and managing hydrogeologic and engineering geologic projects for landfill, industrial, and municipal sites. Conducted petroleum tank leak, solvent leak, fault activity, landfill expansion, report of waste discharge, and solid waste assessment test report investigations. Designed and installed monitoring systems for several municipal landfills.

Representative project experience included: investigations of the activity of the Indian Knob and Shannon faults for proposed expansion at landfills in San Luis Obispo and Santa Clara Counties, hydrogeologic investigations for landfill expansions in Sacramento and Santa Clara Counties, and assessment and remediation of a 500,000 gallon diesel tank leak.

1979 - 1986

U.S. Geological Survey

Menlo Park, CA

Geologist

Operational geologist for the Pacific-Arctic Branch of Marine Geology. Worked on sea-floor mapping, marine geotechnical studies, and environmental research projects off the coasts of Alaska, California, Oregon, Washington, New Zealand, and Antarctica. Interpreted soils engineering and sedimentological test results, seismic stratigraphy, and geophysical surveys, with emphasis on engineering properties, geologic hazards, and stratigraphic correlation.

Selected Publications and Presentations

- Johnson, K. and J. Panders, *How Do Modern Landfills Leak?*, Proceedings Sardinia 2003 Ninth International Waste Management and Landfill Symposium, ed. Christensen, T. H., Cossu, R., Stegman, R.
- Cochrane, D. and Johnson, K., *Evaluation and Mitigation of Potential Ground Rupture Hazards Owing to Surface Faulting as MSW Landfills*, Proceedings Sardinia 2001 Eighth International Waste Management and Landfill Symposium, ed. Christensen, T. H., Cossu, R., Stegman, R.
- Johnson, K., Einarson, M., Fowler, W., and Gambelin, D., *An Expensive Lesson: Hydrogeologic Characterization Is The Key to Inward Gradient Landfill Design*, Proceedings SWANA's 2nd Annual Landfill Symposium, Sacramento, California, 1997 and in: Water Quality International, November/December 1997, p. 43-45.