PREPARED FOR:

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WESTERN ELITE, INC.
WESTERN ELITE MATERIAL PROCESSING FACILITY
LINCOLN COUNTY, NEVADA

OPERATING PLAN

(NAC 444.684)

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Operating Plan
Western Elite Material Processing Facility
Lincoln County, Nevada

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1.0 GENERAL

In accordance with the Nevada Administrative Code (NAC) 444.684, this Operating Plan has been prepared for the Western Elite Inc. (WEI) Class III solid waste landfill facility. In addition, this plan addresses the compliance of the facility with the requirements presented in NAC 444.6665 through 444.668 and NAC 444.686 through 444.7025. The site is located along U.S. Highway 93, mile marker 8, Lincoln County, NV, approximately 60 miles north of Las Vegas. The Nevada Division of Environmental Protection (NDEP) is the solid waste management authority having jurisdiction over the facility.

This Operating Plan is intended to provide operational guidance to site management and operating personnel for the day to day operation of the facility and also describes procedures for managing special problems and situations that may occur. Operation of the Class III Disposal Facility will conform to the applicable NAC regulations and the best current management practices in the industry.

2.0 PERSONNEL (NAC 444.684(1))

This plan presents the equipment and personnel required for handling the new gate waste. The Class III landfill may operate 24-hours per day, 365 days per year. Employees will work in 8-hour shifts. A supervisor will be assigned to each shift and will be responsible for monitoring trucks entering the site, record keeping, and waste weight calculation.

Initial construction, landfill operation and the continued mulching and composting operation will be performed by WEI employees. Landfill personnel will consist of one supervisor and equipment operators as necessary. The number of equipment operators is dependent upon the amount of Allowed Waste (section 5.1), received at any one time.

All employees will be given site-specific training regarding waste characterization and handling. Management personnel have been certified as having completed the Landfill Operations Course offered by the Environmental Industry Associations.

2.1 Plan for Equipment

Equipment necessary for the normal landfill operation will be maintained and stored on site. This primary operating equipment will include a CAT D-8 dozer (or equivalent), a CAT 992 wheel loader (or equivalent) a CAT 769 water truck (or equivalent) and a CAT 12G motor grader (or equivalent). Other operating equipment will be leased or purchased as necessary to operate

the site in accordance with the NDEP permit. Incidental tools and equipment necessary to maintain efficient operation will also be stored on site.

3.0 FIRE CONTROL PLAN (NAC 444.684(2A))

Western Elite has developed this plan as a fire control, response and action plan for the facility in the event that a fire breaks out in the landfill. The burning of any material onsite will be prohibited. Additionally, as another fire control measure, the waste will be placed in cells and at the end of each week will be covered completely with 12 inches of soil. This includes the top and all sides of the weekly cell. This will ensure that if a fire breaks out in a cell, it is unlikely to migrate to an adjacent cell. All waste tires accepted at the facility will be covered with Allowed Waste as outlined in the Nevada Administrative Code.

3.1 Fire Control Plan for Disposal Facility

If a fire is discovered in the disposal cells, or in an onsite structure, immediate fire suppression activities will be initiated. These suppression measures will include the following.

Specifically, fire extinguishers, a water truck, and at least one rubber tire front-end loader are present at the site and will be used to suppress a potential fire. These extinguishers will be placed in the gatehouse, on each vehicle, at the tub grinder and screen, the tower platform, the storage building, and other pieces of operational equipment. To ensure functionality, the fire extinguishers will be checked monthly and the log will be kept onsite. A water truck, will be maintained at the facility and used for fires that cannot be put out with the extinguishers.

Wheel Loaders will be used to place cover material over burning material in an effort to distinguish the fire. At all times during operation, a clean soil stockpile area (at least 500 yd^3) will be maintained onsite for use in extinguishing a fire.

A wheel loader with a minimum 4 cubic yard bucket will be present at the site. Small fires will be controlled through the use of either loaders and/or on-site fire extinguishers. Water will be used to suppress any fire not controllable by the previously described methods. All fire equipment will be shown to employees and instruction will be given on fire-fighting procedures for a potential fire. Additional water supply is available in ponds located to the north of the site.

In the event that a fire is discovered at the working face of the landfill, the attending site manager will evaluate the threat and what equipment will be required to eliminate the fire. The safety of the facility personal and any waste haulers will be of paramount importance in the event a fire breaks out.

Records will be maintained at the facility documenting any fire and the measures used for its suppression. The information in these records will include the date and time the fire was reported, location and severity of the fire, what suppression methods were used, any injuries sustained from the fire.

Fires which originate within the fill shall be handled by removing all the burning material from the fill and extinguishing it as described above. Excavation of burning materials shall be undertaken in a planned and controlled manner; with sufficient fire fighting equipment present to control any "flare-ups" which may occur as outside air reaches the burning materials. All fires will be reported to NDEP within 24 hours.

4.0 LITTER CONTROL PLAN (NAC 444.684(2B), NAC 444.747)

Due to the nature of the Allowed Waste, blowing litter is an ongoing concern at the facility. Blowing litter is controlled through a series of either fences and/or dirt berms. Litter control fences and berms will be cleaned at least weekly and by patrolling daily. A six-foot high fence will be maintained at the working face of the landfill to ensure the reduction of wind blown debris. The entire facility perimeter will be inspected daily and any discovered scattered litter will be returned to the working area. Additional litter control fences may be constructed and placed in strategic locations around the working face to capture wind-blown material. The perimeter berms will also serve to capture and contain wind blow debris from the landfill. During extremely windy conditions, all activities that could lead to blowing litter (grinding, static windrow construction, and screening) will be curtailed. In accordance with NAC 444.686(2), the working face of the landfill will be restricted in width and will be as narrow as possible to control debris.

5.0 WASTE HANDLING PROCEDURES (NAC 444.684(2C), NAC 444.6665, NAC 444.692, NAC 444.694)

5.1 Allowed Waste

The waste accepted (defined as "Allowed Waste" as set forth in this paragraph) at the Western Elite Material Processing Facility results from:

1) Construction, refurbishing, and/or demolition of buildings or other structures.
2) Collection of other similar nonputrescible solid waste, consisting of paper, cardboard, tin cans, wood, glass, bedding, crockery and similar materials, from commercial waste generators.
3) Industrial Wash Water Sump and Grease Trap Wastes
4) Asbestos
5) Coal Combustion Byproducts

6) Waste Tires
7) Water Treatment Plant Solids / Biosolids
8) Pulp and Paper Solids
9) Automobile Shredder Residue

5.2 Unauthorized and Prohibited Waste

Unauthorized or prohibited wastes include, but are not limited to, municipal solid waste (MSW), residential waste, hazardous waste, PCB wastes prohibited in landfills, and liquid wastes.

Measures have been incorporated into the collection system and landfill operations to ensure that only Allowed Waste are transported, accepted, and disposed. Appropriate measures, as discussed in detail below, include control of the Allowed Waste, transportation of material, and incorporation into the landfill.

5.3 Pre-Screening

WEI accepts Allowed Waste, solely from known and pre-approved suppliers. Due to the nature of the collection procedure, pre-screening by WEI will typically not occur on containers of Allowed Waste. Waste collection companies will transport containers of Allowed Waste to the Western Elite Material Processing Facility for waste screening in accordance with sections 4.0 – 7.0 of the Waste Characterization Plan.

Upon entering the project site, all vehicles must stop at the scale to be weighed and monitored. This will restrict access to the site to only WEI employees and authorized waste loads. Incoming loads will be inspected by the gate attendant and equipment operators. Facility personnel will be trained to identify unauthorized waste, the proper steps to take if unauthorized waste is discovered, how to report the unauthorized waste, and how to conduct the proper response actions. Site personnel will also conduct random load inspections and keep records of such inspections. Therefore, the potential for illegal dumping, or the acceptance of unauthorized waste material, will be minimized. Implementation of the waste screening plan is described in detail below.

Materials will then be transported to the Class III landfill. Prior to landfilling, salvage operations to recover recyclable material may be performed.

6.0 CONTROL OF EXPLOSIVE GAS (NAC 444.667)

Nevada Administrative Code (NAC) 444.735 requires the owner/operator of Class III Disposal Facilities to provide safeguards against the uncontrolled migration of decomposition gases (methane, hydrogen sulfide, carbon dioxide), collectively referred to as landfill gas, originating from the waste being disposed of at the site. Additional requirements include those under NAC 444.670.1(j), which specifies that composting facilities shall have provisions in their Operating Plans for controlling odors that may be associated with the composting and material recovery activities. Prepared in general accordance with NAC 444.667, the Western Elite Material Processing Facility's Decomposition Gas Monitoring Plan contains operating criteria for the control of explosive gases at the solid waste facility. A copy of the Decomposition Gas Monitoring Plan is attached as Appendix I to this Plan.

7.0 OPEN BURNING (NAC 444.6675)

Open burning shall not be permitted.

8.0 VECTOR CONTROL (NAC 444.6678, NAC 444.694)

Due to the character of the Allowed Waste anticipated to be deposited in the landfill, rodents and vectors are not anticipated to be a problem. WEI does not anticipate that any accepted Allowed Waste will contain putrescible material common in municipal solid waste. Upon the landfill's construction and operation, should rodents and vectors become a problem, WEI will contact and outside environmental consultant for further guidance.

9.0 EMERGENCY AND SAFETY PLAN (NAC 444.684(4), NAC 444.670)

9.1 Employee Training and Safety

Compliance with basic worker safety is paramount at this remote site. To help promote safety, employees will be given a thorough tour of the facility. The facility tour will consist of familiarizing employees with equipment, fire fighting procedures, and caution areas. Personal protective equipment will be provided and required for employees working near the grinder. Such protective equipment will consist of hard hats, protective footwear, and gloves. Issues concerning dust are addressed below under the heading Dust Control. Employees will be shown the on-site equipment and related potential hazards, and will be trained in the mitigation of those hazards.

Employees will be trained in the identification of hazardous and unacceptable materials that may be brought to the facility by trucks hauling waste onto the site from other locations. Employees will be instructed to refuse shipment of Allowed Waste, if it contains hazardous materials.

A First Aid Kit will be maintained on site in case of an accident. In addition, an eye wash station will be installed in the chemical storage area for emergency purposes.

WEI will maintain an up-to-date log and summary of occupational injuries and illnesses on OSHA Form 200, otherwise referred to as an OSHA Log, that lists each injury and illness that occurred at the facility during the year. For each case on the OSHA Log, WEI will prepare a supplementary record (OSHA Form 101, or equivalent) that provides additional details about the injury or illness. Further, a safety poster and associated documentation will be displayed at the facility.

There is a landline telephone located approximately one quarter mile to the north of the site in the scale house. The facility manager will also be provided a

mobile cellular phone. The following emergency numbers and contacts will be posted in the storage building as well as the scale house.

Emergency Contacts
Western Elite, Inc.
420 N. Nellis Blvd. A3-234
Las Vegas, Nevada 89110

Contact: Ryan Williams:
702-250-3045 cell phone
702-459-3742 fax

Contact: Ron Williams:
702-250-8328 cell phone
702-459-3742 fax

Lincoln County Sheriff - Alamo Substation: 702-725-3375

Lincoln County Volunteer Fire Department - Alamo Substation: 702-725-3375

Fire, Police, Ambulance Emergencies: 911

9.2 Fire Safety

The operators at the landfill shall use the following Fire Fighting Procedures:

a. At the first sign of fire, at any location within the site, the operators will use the provided fire extinguisher and/or cover material, as soon as possible, to extinguish the fire. The Lincoln County Volunteer Fire Department, Alamo Substation, will be called.

b. If combustible material is smoldering, the front end loader operator will spread out the smoldering material and cover it with cover material. The Lincoln Volunteer Fire Department, Alamo Substation, will be called.

The closest responding fire-fighting station is the Lincoln County Volunteer Fire Department located in Alamo. Their assistance can be requested via the Alamo Substation by calling 911 (emergency), or (702) 725-3375 (non-emergency).

As a general protection the operators will adhere to the following Fire Control Guidelines:

a. The unloading, transfer, salvage, and other appropriate areas will be posted as No Smoking areas. Smoking will only be allowed in designated areas approved by the local fire authority.

b. Open fires shall not be permitted at the landfill.

c. A minimum of 16 feet will be maintained between any stockpiles, fuel sources or combustible material to aid access for fire fighting.

d. All electrical equipment will be inspected every other week. Worn or frayed extension cords will be placed out of service immediately. Suspect electrical equipment will be tagged and sealed off-line and inspected and repaired as soon as possible.

e. A copy of these Fire Fighting Procedures and the Fire Control Guidelines, in English and Spanish, will be provided to all operators.

f. A copy of the Fire Fighting Procedures and the Fire Control Guidelines, in English and Spanish, will be posted at the landfill.

g. The local Fire Department will be consulted on reducing the risk of fire at the site.

9.3 Process Safety

Safety signage will be posted at the entrance and in specific areas of the Site to inform visitors and employees of potential site hazards. A safety instruction sign will be posted at the main entrance to the site. A white-background sign with black lettering will have a statement to the effect that all visitors are required to report immediately to the scale house for a safety and site familiarization briefing by a WEI foreman. Combustible liquid placards will be placed on the diesel tanks associated with the tub grinder and the trommel.

Areas in which access will be required for equipment operation and maintenance will be routinely (at least weekly) cleared of debris. Hoses and extension cords will be coiled and stored neatly when not in use, to prevent slip, trip, and fall hazards. Warning signs will be posted and other physical barriers (i.e. yellow or red lines and/or a chain or rope elevated at approximately 36 inches from the ground surface) to prevent employees and other personnel from walking on the two flat bed trailers that support the tub grinder enclosure.

9.4 Equipment Safety

Machine guarding is required wherever the potential exists for an employee to come into contact with the moving parts or the conveyor belt (e.g. rollers or idlers). An emergency stop wire or similar device will be installed along the picking station conveyor belt, in the areas that employees will be working, so that the employee may

stop conveyor belt operation in the event of an emergency. Two flat-bed trailers support an enclosure over the tub grinder to prevent any projectiles from being thrown from the grinder.

9.5 Backup Equipment

All processing equipment (except the tub grinder and the screen) is diesel-powered and portable. Minor equipment breakdowns are managed by WEI mechanics and typically are corrected within two days. In the event of severe mechanical failure, similar processing equipment can be rented from area facilities. WEI maintains good relationships with local equipment vendors who can provide back up and temporary equipment on very short notice. Power failures do not present a significant risk, since all processing equipment is diesel-powered.

9.6 Contamination Release from the Site

The facility manager or his designated agent will notify the Director as soon as possible after he has knowledge of a release as described in NAC 445A.347. This notification will be no later than the end of the first working day after the release. The notice will be by telephone at 1-800-992-0900, extension 4670.

9.6.1 Response

The following procedures should be followed in case of contaminant release:

- Determine location, extent, type, and if possible, cause of release. (e.g., leachate, toxic gas, contaminated storm water, fuel spill, etc.)
- Notify the Facility Manager or other designated individuals, and implement safety and emergency response procedures.
- Notify the local fire department, if necessary. Clearly state:
  - Name and location of facility.
  - Location of contaminant release.
  - Extent of contaminant release.
  - Type of contaminant release.
  - Actions now being taken.
- Notify proper authorities.

9.6.2 Follow-Up

Unless the occurrence of a contaminant release is clearly due to very unusual circumstances, the Facility Manager shall take corrective action to prevent recurrence of the release. The corrective action shall be approved by the appropriate state and local agencies and the Nevada Department of Environmental Protection (NDEP) prior to implementation. A report shall be filed at the landfill by the Manager in order to have a permanent record for inquiries by state agencies or County personnel. The report should state:

- Time/date of incident or its discovery.
- Type of contaminant release and effects of release.
- Source of contaminant release.
- Responsive action taken and effectiveness of action.
- Agencies contacted.
- Corrective actions planned and schedule.

10.0 OPERATION AND MAINTENANCE OF LANDFILL (NAC 444.686, NAC 444.670)

The Class III Disposal Facility will be equipped with a synthetic liner and leachate collection system for the disposal of unprocessed waste material and waste residue that does not meet the specifications for its composting and mulching operation. The Class III Disposal Facility will be constructed in phases, and when completed, will cover approximately 81 acres. The existing composting and mulching operation is currently limited to Lot 11. The initial cells for the Class III Disposal Facility are proposed for Lot 5 and a portion of Lot 1. As additional cells are constructed, the disposal facility will expand eastward, and will eventually encompass Lot 11, with the off-specification material being disposed of in the lined Class III Disposal Facility. Re-positioning of the processing and composting operation to an area within the footprint of the waste cells, a closed area of the landfill, or a future designated area, will occur prior to the construction of Cell 10. The life of the disposal facility, estimated based on disposal capacity, the current incoming volume of material and the expected reduction ratio due to the mulch and composting operation, is approximately 65 years.

The facility uses a static windrow composting process. The primary feedstock for the composting facility is new construction debris sorted at recycling facilities in the Las Vegas area. This material consists of dimensional lumber, paper, plastic, metal, cardboard, gypsum wallboard, and other inert materials. A portion of the reusable resources such as wood, metals, plastic, and other inert materials are removed prior to delivery at the WEI facility. The Facility may accept higher nitrogen content feedstock such as manure, biosolids, plant and yard debris. The higher nitrogen feedstock will help balance carbon-to-nitrogen ratios and decrease the residence time of the material. No putrescible waste, such as food waste, is accepted.

The recycling process consists of five processing operations. These operations include: 1) sorting, 2) grinding, 3) sizing, 4) fine sorting, and 5) coloring or composting. Material that cannot be recycled through one of these operations will be taken to the landfill.

10.1 Acceptance Criteria

Material deliveries are only accepted from known and pre-approved suppliers. Deliveries are measured to record the amount of cubic yardage received at the site. Each load of materials received is checked for undesirable and suspect materials. Employees are trained to identify materials that may be considered hazardous (i.e.

spray cans, solvent, paint cans or containers, insulation, containers holding free liquids, and related materials). No hazardous materials are accepted.

10.2 Unloading and Pre-Sorting

WEI personnel inspect delivered loads and remove oversized or non-processable items such as plastic and metal. Each load is visually inspected to assess its potential use as either mulch or soil amendment. Loads intended for the production of mulch are primarily wood. Loads intended for the production of soil amendment may contain a small percentage of other materials, including particleboard, gypsum board, paper, cardboard, and landscaping waste (i.e., leaves, clippings, soil, and similar organic materials if this material is conducive to the composting process and may enhance the quality of the soil amendment).

10.3 Grinding

A loader transports the feedstock to a "tub" grinder for size reduction to three inches or less. Water is added during the grinding process to increase moisture content and for dust suppression. The pulverized debris is forced through a steel grate at the base of the tub. The tub grinder is covered by a rubber-coated, 3/4-inch steel enclosure. The enclosure is supported by two flat-bed trailers located on the east and west sides of the grinder.

10.4 Size Separation (Screening)

After the debris is pulverized in the tub grinder, the material is transported by either a front-end loader or a conveyor to a diesel-powered trommel. The trommel is used to size and segregate the composted debris. Materials that fall through a 3-inch screen at the base of the trommel are considered *"sized material or "product"*, and are deposited beneath the trommel. *"Over-sized material"* (comprised of the remaining portion of the debris) will be hauled to the landfill.

10.5 Composting

Sized material will be transported to windrows for composting. Windrows allow for watering, monitoring, aerating, and equipment access to the materials. Water is added periodically to maintain moisture content. The sized material is composted for a period not to exceed 600 days. At the end of the composting period, the composted material is transported to a trommel for final screening. Materials that fall through a 1-inch (+/- ½") screen at the base of the trommel will be separated into stockpiles for mulch and soil amendment material. Over-sized material (material not passing through the screen) will be taken to the landfill.

10.6 Finished Product

10.6.1 Standard Mulch

Material intended for mulch is ground and/or sized to three inches or less. The material is then transported directly to a finished product stockpile. A Process Flow Diagram for this finished product is provided in Appendix II.

10.6.2 Soil Amendment

Soil amendment material is sized to 1.5 inches or less. Clients often specify physical and chemical characteristics of the soil amendment material; therefore, the time required for composting is subject to change. A Process Flow Diagram for this finished product is provided in Appendix II.

Prior to delivery to the client, the composted material is mixed with sand in percentages referenced in the table below, or based on client requirements.

Product	Composition	Approximate Size	Approximate Composting Time Requirements
Standard Mulch	100% wood	2" – 3"	100 - 600 days
Soil Amendment	70% wood, 30% sand	1 % "	100 - 600 days

10.7 Monitoring and Testing

10.7.1 Process Parameters

Four key factors affect the composting process: temperature, moisture content, nutrient balance, and aeration. WEI will monitor three of the following parameters as follows:

Parameter	Testing Frequency	Desired Range
Temperature	Weekly	110 to 150 deg. F
Moisture Content	Weekly	55 to 70 percent
Nutrient Balance	Monthly	60 – 90:1*
PH	Monthly	7.0 - 9 0

*Nutrient balance determined by carbon to nitrogen ratio (C:N).

Temperature is be measured by inserting a 36-inch thermometer into the windrow in a grid pattern with 50-foot intervals. Moisture content is approximated by collecting samples from not less than two feet from the outside of the static windrow

and visually inspecting the material for cohesion. In general, the temperature is also a factor of moisture content, as the temperature is reduced with both insufficient and excess moisture content.

Although the optimum carbon-to-nitrogen (C: N) ratio for fertilizer should range between 25 and 40 to 1, the materials produced at this facility are soil amendments and decorative landscape products. The C: N ratios for soil amendment are intended to range between 60 and 90 to 1 for soil amendments. The C:N ratio is not relevant to the production of decorative mulch, as this is not a composted product. Aeration of the static windrows will be conducted when temperatures exceed 150 degrees Fahrenheit and/or every 180 days (the lesser of the two timeframes).

10.7.2 Heavy Metals

The term "heavy metals" refers to a group of trace elements that includes arsenic, barium, cadmium, chromium, lead, mercury, selenium, silver, and zinc. These metals occur naturally in soil.

Federal Regulations (40 CFR part 503) have been promulgated to address concerns with heavy metals and pathogens. Although Nevada has not adopted the Federal regulations into the state's composting regulations, WEI believes in the importance of monitoring for trace elements that may be detrimental to users of its material. Due to the nature of the feedstock, excessive levels of heavy metals are not expected. Laboratory analytical data from product samples collected over the past four years indicate low or below detection limit concentrations for these metals.

WEI will semi-annually take a composite sample of finished product to be tested for heavy metal concentrations. One composite sample will be collected from each finished product stockpile at all four sides and the top of the pile. A one-inch hand auger will be used to collect a sample from at least four feet into the finished product stockpile. The five samples will be composited and placed in one jar for laboratory analysis. Any finished product that exceeds federally regulated limitations for heavy metal concentrations will be disposed of in an appropriate facility.

10.7.3 Additional Parameters

While the market is the most significant factor regulating quality, the finished products go through a series of evaluations and testing to ensure product quality. First, finished products are visually evaluated to ensure that the product quality standards have been met and that they conform to NAC 444.670. The color of the products will vary depending on intended use, residence time, and moisture content. Generally, these products will range in color from light to dark brown and will be at least 98% free (by weight) of foreign materials. Finished products will be readily identifiable by their uniform size (no larger than 3 inches) and color.

Other composition analyses will be performed as necessary to satisfy horticultural market needs. Copies of all test results and monitoring activities are kept at the WEI office in Las Vegas for a period not to exceed three years. Soils experts from an agricultural laboratory will assist and check quality control in finished products.

10.8 Material Quantities

The facility will allow no more than 150,000 cubic yards of "in-process material" and 120,000 cubic yards of "product" to accumulate outside the limits of the lined cells.

For business reasons, should the need for additional on-site storage of "in-process material" or "product" be needed, WEI reserves the option to request an amendment to their Class III disposal permit.

10.9 Daily Maintenance and Inspection

The site will be maintained in a neat and orderly manner. The area surrounding the landfill will be surveyed by employees on a daily basis and all scattered paper and other lightweight debris will be returned to the landfill area.

Discarded food items and other putrescible material generated by employees will be stored in a garbage can with a tight fitting lid and the contents will be disposed of off-site in an appropriate manner. The access road will be maintained, through grading and the application of water, to keep fugitive dust at a minimum.

10.10 Administration Building Tool/Shed (NAC 444.700)

Operations associated with the landfill will use existing buildings associated with the existing salvage yard and the scale house. The salvage yard operation has an existing metal mechanics shop that serves as a tool shed, and equipment maintenance shop. Incidental tools and equipment, and employees' personal items are stored in this building. No hazardous materials or construction debris of any kind will be stored in the building. All appropriate records will be stored in the scale house.

The scale house, located approximately 1,000 feet away, will be available as a lunch room. The trailer adjacent to the scale house has bathroom facilities that will be available to WEI employees.

10.11 Security/Signage (NAC 444.690)

Signs will be posted at the entrance of the landfill facility and at various places along the fence showing the following:

- Private Property/Trespassing prohibited
- Identification of the site owner/operator
- Prohibitions against illegal dumping and open burning

The scale house, operating 24 hours per day, will be responsible for security. Vehicles entering the site will be monitored. Public access will be forbidden at this site.

There is a landline telephone located approximately one quarter mile to the north of the site in the scale house. The facility manager will also be provided a mobile cellular phone.

11.0 COVER OF COMPACTED WASTE (NAC 444.652, NAC 444.688)

A minimum of twelve inches of cover material will be placed over exposed compacted waste at the end of each working week to control fires, odors and blowing litter. The integrity of the cover material will be maintained until further filling is resumed or the final cover is constructed. The cover material will be routinely inspected and erosion, cracks and depressions will be repaired as soon as possible. The cover material will be graded to promote drainage of surface water with slopes of not less than three (3) percent.

Cover material will be obtained from cell construction activities and adjoining borrow activities.

12.0 RUN-ON AND RUN-OFF CONTROL (NAC 444.6885, NAC 444.6887)

12.1 Run-on Control

NRS 444.6885 requires that a system is provided to control run-on during the peak discharge from a 25-year flow. The run-on control system for the facility has been designed to intercept and divert the upland run-on for at least a 100 year, 24-hour storm event. The SCS TR-55 method was used to calculate peak flows and storage volumes. Approximately 3,566 acres primarily west of the site will be collected in a perimeter stormwater conveyance channel along the western toe of the landfill that will convey the run-on to Stormwater Detention Area #2 (SDA-2). An additional ±1,760 acres from the northwest and north of the site will drain direction into SDA-1. A map showing these areas is provided in Appendix V of the Design Report.

The peak discharge from the 3,566 acres to the west of the facility for a 100 year, 24-hour storm event was calculated to be approximately 47.9 cubic feet per second (cfs). The perimeter ditch is a trapezoidal ditch with 2H:1V side slopes, a bottom width of 25.00, and a 1.2 percent flow line slope. This design provides a flow capacity of approximately 450 cfs. Thus, the resulting factor of safety for the 100 year, 24-hour storm event was calculated to be 9.4.

Due to this high factor of safety and the extreme storms experienced in Las Vegas in August of 2003, and July of 1999, the perimeter ditch was evaluated for the 500 year, 24-hour storm event. The peak discharge for the 500 year, 24-hour was calculated as 120.3 cfs. Thus, the resulting factor of safety for the 500 year, 24-hour storm event was calculated to be 3.7.

SDA-2 was designed to collect and hold the volume of run-on from the entire ±5,362 acres to the west, north, and northwest that drain towards the facility, as well as run-off from the western and northern slopes of the landfill (35.3 acres). The 100 year, 24-hour storm event peak discharge for this area was calculated as 84.6 cfs. Using SCS TR-55, the estimated storage volume necessary to collect and store this flow is approximately 42.4 acre-ft. SDA-2 has a total storage volume of approximately 46.7 acre-ft; thus, providing a factor of safety of 1.1. It is assumed, based on the soils and climate at the site that the stormwater collected in SDA-2 will infiltrate through the bottom of the basin or evaporate. As a result, a discharge structure from the area is not needed. The run-on control system and details are shown on the design drawings. All supporting calculations are included in Appendix V of the Design Report.

The remaining stormwater from the north and east is collected in the Pahranagat Wash, a tributary to the Muddy River, which bypasses the facility on the east. The potential 100-year, 24-hour storm event run-on volume for the Pahranagat Wash at a point located to the north east of the facility was calculated to verify that the existing tributary is adequate to provide storage and prevent encroachment on the perimeter berm of the facility. Drainage calculations are provided in Appendix V of the Design Report.

The expansion area has been designed to prevent run-on from entering the active disposal area. The only drainage area that could contribute run-on to the active portion of the expansion area is the existing landfill's eastern slope. A series of diversion berms and drainage ditches will be in place on the eastern slope of the existing landfill prior to the construction of the expansion area.

12.2 Run-off Control

Run-off from the site will be carried by a system of ditches along the side slope benches and downslope drains into one of two stormwater detention areas. The SCS TR-55 method was used to calculate peak flows and storage volumes. A 100-year, 24-hour storm event was used as the design basis for all of the run-off control systems; thereby, exceeding the minimum design criteria of the 25 year, 24-hour storm event required by NAC 444.6885.

To be conservative, all of the ditches on the landfill sideslopes were designed using the worst case (largest area and smallest time of concentration) ditch drainage area, which was calculated as 2 cfs. The ditch design is a V-shaped ditch, 2 feet deep, 3H:1V sideslopes on the uphill side and 2H:1V sideslopes on the down hill side, and a 2 percent

flow line slope. This design will provide drainage capacity for approximately 91 cfs, which provides a factor of safety of 45.

The sideslope ditches convey water to one of two rip rap downslope channels, which provide a flow capacity of approximately 890 cfs each. Each rip rap channel collects run-off from 10 separate sideslope ditches. Assuming worst case, a total of 20 cfs is the maximum runoff that is anticipated to flow to the rip rap channel. The resulting factor of safety is 44.

Finally, the downslope channels discharge into either Stormwater Detention Area #1 (SDA-1) or SDA-2. To be most conservative, the stormwater detention area designs were based on the final grades of the landfill. The design for SDA-2 was already presented above in the previous section. SDA-1 will collect the run-on for the remaining portions of the landfill not collected by SDA-2, which consists of the eastern and southern sideslopes and encompasses approximately 44.4 acres. The 100 year, 24-hour storm event peak discharge calculated for this area is 11 cfs. Using SCS TR-55, the estimated storage volume necessary to collect and store this flow is approximately 1.9 acre-ft. The SDA-1 has a total storage volume of approximately 2.86 acre-ft; thus, providing a factor of safety of 1.5. It is assumed, based on the soils and climate at the site that the stormwater collected in SDA-1 will infiltrate through the bottom of the basin or evaporate. As a result, a discharge structure from the area is not needed. Supporting calculations are provided in Appendix V of the Design Report.

13.0 CLOSURE AND POST-CLOSURE (NAC 444.6891 THROUGH NAC 444.6897)

A Closure Plan has been prepared for the Western Elite Material Processing Facility which specifies the closure and post-closure activities required for compliance with NAC 444.6891 through NAC 444.6897. A copy of the Closure Plan is attached as Appendix F of the application. As required by NAC 444.6897, a copy of the Closure Plan will be maintained in the operating records for the site.

14.0 EROSION AND DUST CONROL (NAC 444.696, NAC 444.745)

The landfill site has the potential for wind erosion. Since the site receives nominal amounts of rain, hydraulic erosion poses little threat to the site.

The perimeter berm will prevent overland flow of water onto the landfill. Neither run-on of water from the surrounding area, nor run-off from the landfill area are expected to be a problem due to the design of the landfill and the low frequency of precipitation events.

The design of the final cover has taken wind erosion into consideration. The final cover has been designed to have 24 inches of native material above the flexible membrane cap with native plant species in addition to native gravels and mulch produced on site. WEI will inspect

the landfill on a quarterly basis to evaluate the integrity of the final cover. If the integrity of final cover is damaged, WEI will restore the lost material and reseed.

Sources of dust at the facility include the delivery of material, material grinding, material handling, and material screening. Dust from incoming vehicles will be minimized by periodic wetting of roads. Incoming loads will be sprayed down before unloading if necessary. The existing gravel driveway also minimizes dust generation. Dust generation during grinding is minimized by an innovative spray system that applies water to the material as it passes through the grinder. A water truck is maintained on site to provide dust control and moisture addition to the materials in the composting process. The water truck is served by a number of standpipes located strategically on the property. Maintaining appropriate moisture levels in the static windrows also helps alleviate on site dust. Material screening will be scheduled with the intent to minimize dust dispersal. Facility workers will be provided OSHA-approved dust masks upon request when working in dusty conditions.

15.0 ODORS (NAC 444.670)

While some odor is to be expected, at materials management and compost facilities, nuisance-level odors should not be produced at a properly managed composting facility. WEI manages the materials to minimize the development of conditions that could lead to odor problems. In general, the potential for odor problems decreases as the composting cycle progresses and temperatures within the compost piles increase. Incoming and in-process materials, including gypsum wallboard, have the highest potential to create odors. On-going evaluations may be necessary to help minimize nuisance odors by appropriate applications with the materials in process.

Since the facility possesses a large tub grinder, it is able to assure that all freshly-ground materials are incorporated into windrows in a timely manner. Odor problems should be diminished further by prevailing on-site winds and by the absence of nearby sensitive receptors (neighbors). Additionally, the reduction of on-site material will substantially lower the amount of material on site and hence reduce the potential for off-site odors. The nearest neighbor to the facility is over 30 miles away. This, and the homogenous nature of the feedstock, should mitigate the impact of any off-site odors considerably.

16.0 NOISE

Noise is controlled through the proper use and maintenance of mufflers on all facility equipment. The largest source of noise on site will be the grinder. Other on-site noise is buffered by the noise of nearby Highway 93. Again, the absence of nearby receptors should minimize impacts from on-site noise.

17.0 ACCESS AND ROADS (NAC 444.698)

Access to the site can be achieved by an existing road, which joins U.S. Highway 93 at mile marker 8, which travels west to the site. The access road will be maintained, as required, to service the existing sand and gravel operation, the existing salvage yard, and the landfill. WEI will maintain the access road for the life of the landfill so that the facility will be easily accessible in all weather to allow access by trucks transporting waste to the facility and composted mulch products from the plant.

There will be no specific areas designated as "severe weather" disposal areas. Proper maintenance of access roads and the working face will allow passage of hauling vehicles in inclement weather.

Access to the site will be limited to vehicles hauling Allowed Waste. No other types of waste will be allowed on site for disposal. However, from time to time, other vehicles will be frequenting the site to: bring or remove heavy equipment from the site needed for construction and/or operation; service ancillary facilities and heavy equipment; collect water samples; and inspect the construction and/or operation of the site.

The scale tender's office, operating 24 hours per day, will be responsible for security. Vehicles entering the site will be monitored. Public access will be forbidden at this site.

18.0 MISCELLANEOUS REQUIREMENTS AND REPORTS (NAC 444.702, NAC 444.747)

WEI will maintain records onsite documenting the volume of each load of in-coming material received, the volume of material or product removed from the site, the volume of product added to product storage, and the total volume of product in storage. Records will be kept at the site for one month and thereafter will be stored at 6345 E. Bonanza Rd. WEI will prepare an annual report detailing the type and weight of solid waste received at the site. The report will be submitted to NDEP on an annual basis.

19.0 OPERATING RECORDS (NAC 444.725)

The Western Elite Material Processing Facility has been designed with provisions for leachate collection and removal, groundwater monitoring and decomposition gas monitoring. Documentation related to the construction of and operation of these systems will be maintained in the operating record. Records of inspections, personnel training and waste screening, as well as the results of gas monitoring and any monitoring required during closure and post-closure activities, will be entered into the operating record as the information is developed.