

## FACT SHEET

(pursuant to Nevada Administrative Code 445A.401)

Permittee Name: **Sterling Gold Mining Corporation**

Project Name: **Sterling Mine**

Permit Number: **NEV0089016 (2013 Renewal Rev 00)**

### A. Location and General Description

**Location:** The Sterling Mine is located in southern Nye County, approximately 8 miles southeast of the town of Beatty, Nevada. The project is located in the historic Bullfrog-Rhyolite Mining District, on the eastern flank of the Bare Mountain Range with Crater Basin and the Yucca Mountains to the east. The mine site is located on public land (administered by Bureau of Land Management [BLM]—Las Vegas Field Office) within Sections 10 through 15, 22, and 23 of Township 13 South, Range 47½ East, and Section 20 of Township 13 South, Range 48 East, Mount Diablo Baseline and Meridian (MDB&M). The current Permittee of Record for the Sterling Mine is Sterling Gold Mining Corporation (SGMC).

**Site Access:** To access the Sterling Mine, proceed approximately 9 miles southeast of Beatty on U.S. Route-95 to the mine access road (unnamed). Proceed east and then northeast approximately 8 miles to the mine site.

**General Description:** The Sterling Mine has been in operation since December 1980. In 1991, Water Pollution Control (WPC) Permit NEV0089016 was first issued to SAGA Exploration Company for the Sterling Mine, a surface and underground mining operation utilizing chemicals to process up to 75,000 tons of ore annually.

Gold is extracted from crushed or run-of-mine ore using conventional cyanide heap leaching technology and recovered using carbon adsorption and stripping. The Sterling Mine is required to be designed, constructed, operated, and closed without any discharge or release in excess of those standards established in regulation except for meteorological events which exceed the design storm event.

### B. Synopsis

**Permitting History:** WPC Permit NEV0089016 was issued to SAGA Exploration Company (predecessor to SGMC), in January 1991. The Permit was renewed in February 2003 and again in February 2008. Since the Permit was first issued, two Minor Modifications have been approved by the Division. The first Minor Modification was approved in December 2005 for the development of a 4000-foot underground exploration decline and waste rock dump. A second Minor

Modification was approved in October 2007 for the construction of a new 300,000 ton heap leach pad.

**Existing Facility:** The Sterling Mine consists of three open pits (Ambrose, Sterling and Burro), underground mine workings, five waste rock dumps (Ambrose, Burro, Low Grade, Boulder and No. 1), a heap leach pad, five ponds (Pregnant, Barren, Make-up, Fresh Water, and Overflow Ponds), and a carbon plant/strip circuit. Ancillary facilities include a lay down yard, office/shop complex and a gravel pit.

**Mining:** The combined footprint for the three pits is approximately 14.0 acres and depth is about 250 feet below ground surface (bgs) for all three pits. Because of the depth to groundwater (over 1,000 feet bgs), lakes will not form in any of the pits at the completion of mining and analytical results indicate that the ore and waste rock from these pits and the underground development does not have a potential to generate acid. Acid neutralization potential/acid generation potential (ANP/AGP) results for the ore and waste rock samples range between 8:1 and 35:1. A portion of the waste rock generated has been used for pit backfilling. None of the pits are currently active.

Exploration activity south of the existing facility within the Bare Mountain Range has identified a gold ore deposit amenable to underground mining methods. Development of a 4,000-foot underground exploration decline is currently underway to provide a drill platform better suited to drilling deeper targets and eventually ore production.

**Closed Heap Leach Pad:** The original heap leach pad (HLP) was permanently closed in 2003. The HLP was constructed prior to the 1989 promulgation of NAC 445A.350 through 445A.447 (Regulations Governing Design, Construction, Operation and Closure of Mining Operations).

The 15-acre leach pad was constructed with a layer of 30-mil PVC (polyvinyl chloride) liner in between six inches of sand above and below the liner. During the life of the pad, over 1,000,000 tons of ore were placed on the pad with a maximum height of the pad of 45 feet above the PVC liner surface. Prior to initiating closure, the heap leach pad was regraded and re-leached to maximize the recovery of remaining gold values. After regrading to a 3:1 (h:v) slope, a 12-inch (nominal) soil layer was placed on the pad. Heap drain down currently averages less than 1 gpm and any draindown solution collected is conveyed to the process ponds for evaporation.

A test heap leach pad, similar in design to the original pad was constructed during the 1980's for testing and evaluating low-grade ores. Two process ponds were also constructed using Hypalon™ (chlorosulfonated polyethylene--CSPE) as the primary liner. In 1996, the Sterling mine completed the movement of

approximately 16,500 tons of spent ore from the test heap to the mine's closed leach pad and initiated closure of the two test heap process ponds.

Diversion ditches were constructed up gradient of the closed heap leach facility to divert runoff resulting from the 100-year, 24-hour storm event, around the leach pad, the ponds, and the process plant and to tie-in with existing natural drainage courses. These remain in place.

***New Heap Leach Pad and Design Revision:*** A Minor Modification for the design, construction, operation, and closure of a new HLP at the Sterling Mine was approved by the Division in October 2007; however construction of the HLP was delayed for several years due to the facility being in "Temporary Closure". With the return to active mining and heap leaching operations during 2011-2012, SGMC proposed several minor changes to their previously approved HLP Expansion design. In addition, pursuant to Schedule of Compliance (SOC) item I.B.1, SGMC will replace all existing solution pond liners with 60-mil HDPE. An Engineering Design Change (EDC) approved on 25 April 2011 revised the HLP liner system design and replaces all solution pond liners.

The new HLP is wedge-shaped and occupies a foot print of approximately 3.7 acres. The pad is divided into three cells, numbered 1 through 3, and is located adjacent to a perimeter access road along the southern boundary of the now closed HLP. The new pad is designed to drain to the east and connect to the existing leach solution ditch through a newly constructed collection ditch along the eastern boundary of the new HLP and southeast corner of the closed pad. All solution

Run-of-mine ore is placed on the pad in three 15-foot high lifts to a maximum heap height of 45 feet above the liner surface and graded side slopes of 3H:1V. The pad is designed to drain to the east and connect to the existing leach solution ditch through a newly constructed collection ditch along the eastern boundary of the new pad and southeast corner of the existing pad. All solution which falls within the new pad reports to the existing Pregnant Pond.

The new pad was initially designed with a 12-inch layer of free draining gravel overliner material; however the April 2011 EDC increased the overliner layer thickness by an additional 6 inches to 18 inches. Beneath the overliner layer is a layer of 60-mil textured high density polyethylene (HDPE) liner (textured side down). The HDPE liner overlies a layer of Bentomat® DN; a geosynthetic clay layer (GCL) material. Bentomat® DN is comprised of a layer of sodium bentonite within two non-woven geotextile layers and with a tested (ASTM D5887) hydraulic conductivity of  $5 \times 10^{-9}$  cm/sec, high internal shear strength, and excellent interface friction on both sides of the GCL.

The Bentomat® DN overlies a minimum 12-inch thick compacted subbase, constructed in two 6-inch lifts. The subbase material has a maximum coefficient

of permeability of less than  $1 \times 10^{-5}$  cm/sec when compacted to 95 percent of the maximum dry density (ASTM D1557).

Since the depth to groundwater at the Sterling Mine site is in excess of 1,000 feet bgs and the tested hydraulic conductivity of Bentomat® DN is below the  $1 \times 10^{-6}$  cm/sec regulatory performance standard for engineered liners (pursuant to NAC 445A.434), SGMC installed four (4) vadose zone monitoring wells (two [2] wells down gradient of the New HLP and two (2) wells down gradient from the ponds), within 200 feet of the New HLP and solution ponds.

**Geotechnical Analysis:** The new HLP was re-analyzed for slope stability using the most current version (Version 5.037) of the SLIDE computer program. The proposed design was evaluated and the most critical slope (tallest portion of the heap and steepest pad slope) was analyzed under static and psuedostatic seismic scenarios with a seismic coefficient of 0.14g. All of the static analyses resulted in factors of safety of greater than 1.5 with a maximum of 2.0 and a minimum of 1.68. All psuedostatic analyses resulted in safety factors greater than 1.0 with a maximum of 1.33 and a minimum of 1.11. Based on these results, the new HLP design will exhibit static and psuedostatic stability with respect to slope failure.

**Solution Collection System:** The Leach Solution Collection System is relatively unchanged with respect to the original design. The EDC modified the management of solution entering the solution transport pipes from the pad and stormwater management through the solution collection ditch.

In the original design, solution was collected by internal collection pipes and directed to discharge along the downstream eastern side of the pad to flow to the northeast corner of each cell into a sump. The solution was then conveyed from the sump via a 4-inch diameter PVC pipe, through the perimeter berm to one of two solid 6-inch diameter HDPE pipes in the solution corridor. No internal solution collection header pipes were installed and solution exiting the pad was allowed to form an open channel along the downstream berm and pond in the HLP cell sumps. Each pipe from the cells was placed in a lined solution corridor and directed to the Pregnant Pond which also served to collect any stormwater runoff from the pad and solution corridor.

The April 2011 EDC optimized the solution collection circuit by providing additional control for process solution and stormwater collection. Process solution is collected along each cell divider and perimeter berm with an 8-inch diameter perforated header pipes. Internal cell divider berms running east to west within the pad separate the solutions. At each cell divider berm, the perforated pipes tie into solid 8-inch diameter pipe that penetrate the berm and continue down the east side of the pad.

At the northeast corner of Cell 1, all three solid pipes (1 for each of the 3 cells) penetrate the perimeter berm and enter an energy dissipation structure. Inside

each structure, the solution passes over a series of baffles and over a v-notch weir so that flow can be accurately measured. After the solution passes over the weir it will enter one of two solid 8-inch diameter pipes depending on whether the solution is "Pregnant" or "Barren/Intermediate". Flow into these pipes is manually controlled. The pregnant and lean pipes will continue down the solution corridor along the eastern edge of the closed HLP area and discharge into the pregnant pond and the intermediate pond for the pregnant and lean solution pipes, respectively. When the corridor reaches the Overflow Pond any stormwater which may be present will be discharged into the Overflow Pond. This will be accomplished by opening up the corridor on the pond side to create a spillway to the Overflow Pond. Stormwater from the northern portion of the existing leach pad will also be diverted away from the Fresh Water, Barren/Intermediate, and Pregnant Ponds to the Overflow Pond by a stormwater diversion berm.

A solution collection ditch is constructed along the east side of the heap leach pad, within the pad, and consists of a lined open channel (60-mil HDPE) that is graded to flow to the northeast corner of each cell. The channel is covered with a net to prevent wildlife access. The synthetic liner in the collection ditch is underlain by compacted subgrade material. The collection ditch has a second 60-mil HDPE liner folded back over the primary liner system to protect it from UV degradation.

**Solution Ponds:** Historical records indicate that the four solution ponds were originally constructed of 30-mil Hypalon™ (CSPE--chlorosulfonated polyethylene) and/or 40-mil HDPE during the early 1980s. Because of the long-term exposure, limited use and minimal maintenance, the primary liners fell into a state of disrepair and with questionable containment integrity. Three ponds (Pregnant Pond, Intermediate/Barren Pond, and Fresh Water Pond) were constructed with double liners and leak collection and recovery sumps (LCRS). The Overflow Pond was constructed of a single liner.

An integrity evaluation was performed on the liner and LCRS for all ponds and conveyance channels and because of their condition, replacement of all liners was warranted. Although the condition of the secondary 30-mil Hypalon™ liners appeared to be satisfactory, the Division recommended at the time that SGMC replace the liners with thicker (at least 60-mil) linear low-density polyethylene (LLDPE) or HDPE.

The April 2011 EDC replaced all geosynthetic liners in all ponds and conveyance channels with new 60-mil HDPE. All ponds (including the Freshwater and Overflow Ponds) are double-lined and leak detected for operational flexibility and are capable of managing the 24-hour HLP draindown and direct precipitation as the result of a 100-year, 24-hour storm event, with 2 feet of freeboard. The subbase for all of the ponds has been reconditioned and recompacted to a permeability of less than  $1 \times 10^{-5}$  cm/sec at 95 percent maximum dry density (ASTM D1557).

The liner system for each pond consists of 60-mil HDPE (single-side textured) as the primary liner overlying a layer of geonet. The geonet overlies a 60-mil HDPE (single-side textured down) as the secondary liner. This configuration provides 1) a preferential flow path for any fluids escaping the primary liner to the leak collection sump located at the lowest corner of the pond and 2) reduction of potential hydraulic head against the secondary liner in the event of a defect in the primary liner.

Each collection sump volume has a nominal effective capacity of about 3,000 gallons. The collection sump is located between the primary and secondary liners and is fitted with a perforated 12-inch diameter HDPE pipe (SDR-32) and surrounded by drain gravel within the sump. Outside the sump the perforated pipe transitions to solid 12-inch diameter HDPE pipe (SDR-32), located between the primary and secondary liners. In the event leaks occur, in the primary liner, the solutions will report to the sump where they can be removed via pumping and reduce the possibility of seepage through the secondary liner by reducing the amount of head on the secondary liner.

***Process Facility:*** The Sterling Mine ores were initially processed by heap leaching at a rate of 200 gpm. The leach solutions were pumped through carbon columns which were situated in a 40 foot trailer located on a cement slab adjacent to the process ponds. The carbon was alcohol stripped to remove the precious metals, the metals electroplated onto steel wool in electrowinning cells and the steel wool smelted to doré' bullion on-site. In 2001, as a result of dwindling reserves and low metal prices, the original carbon columns, which had reached the end of their useful life, were decommissioned, rinsed and removed from the trailer. The decommissioned columns are currently stored inside the fenced process area awaiting disposal.

***Unauthorized Construction of the Sterling Process Facility:*** With the discovery of additional reserves combined with increased metal prices, Sterling was granted authorization in 2012 by the Division to re-initiate the application of cyanide leach solution onto the Sterling Heap Leach Pad (HLP). To process the solutions, new 500 gallon per minute (gpm) carbon columns were installed without Division knowledge to replace the original columns. The new columns were placed directly on the process facility slab where the original carbon columns were housed in the trailer.

Since NDEP-BMRR had never been afforded the opportunity to review any of the engineering designs, the Division was concerned over the adequacy of the containment and containment integrity. Furthermore, Division authorization in 2012 for Sterling to initiate the application of cyanide leach solution on the Sterling Heap Leach Pad (HLP) did not include the process facility.

To rectify the unauthorized construction of the process facility, the Division required in a letter to Sterling dated February 26, 2013, that Sterling submit by

March 15, 2013, a Minor Modification and \$4,000 fee and a complete “As-Built” Report and Quality Assurance/Quality Control Documentation for the Sterling Process Facility. In addition, the report and documentation were to be stamped by a Nevada-registered Professional Engineer who could attest to the design, containment adequacy, and integrity of the Sterling Process Facility. The submittal date was later extended to allow for the completion of the structural evaluation for the Process Facility. All documents and fees were received on April 5, 2013.

*Acid Wash Tank Circuit Containment:* The adequacy of existing containment around the acid wash tank area and its ability to effectively contain acid solution as a result of catastrophic tank rupture or valve failure had been a significant concern with the Division, since it was first discovered during the January 2012 Mine Compliance Inspection. Efforts undertaken by Sterling appeared to be more cosmetic rather than functional as indicated in the engineering designs submitted with the January 25, 2013 EDC in an effort to address Division concerns.

To rectify containment concerns, Sterling was required to submit by March 15, 2013, test results and photographic documentation demonstrating the existing containment design is adequate. Testing involved the severing of the tank’s side discharge valve to determine whether or not any of the tank contents (in this case water) will leave containment. In the event the test demonstration indicated the potential for fluid to leave containment, the Division would require expansion and/or reconfiguration of the existing containment. Failure to do so would result in the delay in the review and approval of any future Permit actions (e.g. Renewals, Modifications, and EDCs and possible compliance actions, including, but not limited to, the suspension of operations.

In response to the Division’s February 26, 2013 letter to Sterling, the Permittee’s consultant (Kappes Cassiday and Associates [KCA]) submitted a Minor Modification to address all unauthorized construction within the Sterling Process Facility. The Minor Modification included an evaluation of the process facility’s secondary containment capacity and integrity, a description of the process facility (including reagents and components present, pump capacities, and tank volumes), and a building structure evaluation performed by the structural engineering firm of Forbes Engineering.

*Process Facility Containment Evaluation:* The Sterling Process Facility is on a 30-foot by 60-foot reinforced concrete slab, 6 to 8 inches thick with a chemical resistant coating and water stop material installed between any concrete joints. A 5-inch high stem wall surrounds the pad with the exception of the south entrance where a 12-inch wide rounded curb has been installed to facilitate vehicle access. The process facility slab has two embedded 3-inch diameter drains which convey solution spills directly to the process ponds. Containment is approximately 157 percent of the capacity of the largest vessel (Barren Tank working capacity 2,596 gallons, total available containment capacity 4,098 gallons).

The Acid Mix Tank has a working capacity of 110 gallons and is located within containment at the southwest corner of the Process Facility. The tank sits on a metal grate which covers an 8-foot by 16-foot by 3-foot deep concrete sump with a containment capacity of 2,872 gallons. The sump does not drain to the process ponds. Containment provided is 2,610 percent of the capacity of the vessel.

The 3,289-gallon Strip Tank is located outside southeast corner of the Process Building, within a 10-foot by 20-foot reinforced concrete slab with a curb height of 4 inches which provides an interim containment capacity of 408 gallons of leakage solution prior to its discharge to an 8-foot by 16-foot by 3-foot deep concrete sump with a containment capacity of 2,872 gallons. In addition, a 4-inch diameter outlet is capable of conveying collected solution through a 4-inch pipe to the double-lined Intermediate Pond. Combined sump and interim containment area capacity is 3,280 gallons, which is significantly less than the minimum 3,617 gallons required.

To meet the minimum 110-percent required containment, Sterling is proposing to decrease Strip Tank capacity by 1) installing a new tank overflow discharge standpipe approximately 65 inches from the floor of the interim containment area and 2) creating additional containment volume by perforating the Strip Tank supports.

A 14-foot by 15-foot by 5-inch high reinforced concrete slab located north of the Process Facility, is utilized for the storage and dispensing of anti-scalant solution. A 6.5-inch diameter outlet and pipeline directs overflow from the 6,500 gallon tank into the Pregnant Pond.

*Process Facility Structure Evaluation:* The Sterling Process Facility Building is a pre-fabricated structure, manufactured by Armstrong Steel Buildings, Inc. The particular design utilized at Sterling is sold under the trade name as “Clear Span-High Boy”. The building is a fabric structure with a steel truss frame system constituting a combined roof and wall system. The weaved fabric is comprised of high-density and low-density polyethylene fibers, sold under the trade name as Nova-Shield II with ArmorKote RB88X-6LD. The approximate fabric thickness is 4 mils. The fabric material meets the prevailing ASTM standards for tensile stress, tearing and UV protection and is also chemically resistant to the reagents currently identified for use within the Sterling Process Facility. Forbes Engineering (Forbes) performed the comprehensive building structure assessment and evaluation.

The light-weight steel truss frame system is designed resists the lateral wind and seismic loads transverses to the structure in the transverse direction while a cable X-brace system resists the lateral wind and seismic loads in the longitudinal direction. Since this is a very light weight structure, wind loads control the structural design of the system. According to Forbes, the seismic loading on this

type of structure is minimal and the structure, as constructed, has more than enough structural stability as required by the Nye County Building Code (and International Building Code) for seismic resistance.

The fabric and steel frame structure is supported by a timber stem wall placed on top of the concrete stem wall. The steel frame baseplate is supported by a continuous ¼-inch steel plate on top of the 2-inch by 6-inch double top plate of the stem wall. The steel baseplate is bolted through the top plates and connected to a steel post cap to a double 2-inch by 6-inch post. This double post is attached to the concrete slab with two steel hold down anchors. These anchors provide direct transfer of the wind uplift forces into the concrete slab.

Based on their assessment of the Acid Wash Circuit containment, KCA concluded that the containment volume for the acid wash tank to be deficient. Although the containment available considering the sump and slab area do adequately hold the volume of a small leak, 3,000 gallon tank and a containment total of 3,412 gallons (2,872 gallon sump, assumed empty, and 540 gallons contained on the slab), KCA concluded that the placement of the tank near the edge of the slab had the possibility of escaping containment in the event of a catastrophic failure. After discussing various options with Sterling personnel on site and reviewing tank volumes and available containment, the decision was made to remove the Acid Wash Circuit completely (E-mail to BMRR dated March 26, 2013).

Acid washing is now performed in the individual carbon columns prior to sending the carbon to the strip vessel. The carbon will be rinsed with fresh water prior to acid washing. After acid washing, the acid solution will be pH buffered to pH 11 or higher before being discharged to the intermediate pond. The carbon is then pumped to the strip vessel, and then returned to the carbon column for further gold loading. Carbon that no longer effectively collects gold (spent) will be rinsed, bagged and shipped off site for final processing.

### **C. Background Groundwater Quality**

***Site Hydrology/Hydrogeology and Water Quality:*** Depth to groundwater is estimated to be at least 1,200 feet below ground surface (bgs). Groundwater quality at water well US-VH2 (Sterling Mine make-up water), indicates that groundwater quality meets applicable Profile I criteria except for iron, mercury, and TDS. Well US-VH2 is located approximately three miles east of the facility and conveys fresh water to the Fresh Water pond.

Groundwater has not been encountered in any of the exploration drill holes on the Sterling property. Recent holes have been drilled to a depth of 1,500 feet from within the underground mine workings and in the vicinity of the leach pad and ponds, holes have been drilled to a depth of 700 feet and 1,000 feet.

**Surface Water:** There are no surface waters (i.e. springs, seeps or streams) within the project vicinity with the exception of ephemeral drainage following storm events that dissipates on alluvial fans. The climate is semi-arid with an average of 4.13 inches of precipitation per year (NOAA). The 100-year, 24-hour storm event was determined to be 2.6 inches of precipitation. The two watersheds contributing surface flow to the area of the process components are diverted via diversion channels engineered to withstand a 100-year, 24-hour storm event.

**Vadose Zone Monitoring:** As stated previously, depth to groundwater at the site is in excess of 1,000 feet. In an effort to evaluate potential impacts to the vadose zone as a result of an accidental release of process fluid, SGMC has installed vadose zone monitoring wells down gradient of the HLP and solution ponds for the purpose of performing early detection of fluids beneath the heap leach facility and ponds.

**D. Procedures for Public Comment**

The Notice of the Division's intent to issue a Renewal Permit authorizing the facility to construct, operate and close subject to the conditions contained within the permit, is being sent to the **Pahrump Valley Times** for publication.

The NOPA is mailed to interested persons on our mailing list. Anyone wishing to comment on the proposed permit can do so in writing within a period of 30 days following the date of publication. The comment period can be extended at the discretion of the Administrator. All written comments received during the comment period will be retained and considered in the final determination.

A public hearing on the proposed determination can be requested by the applicant, any affected State, any affected intrastate agency, the regional administrator, or any interested agency, person or group of persons. The request must be filed within the comment period and must indicate the interest of the person filing the request and the reasons why a hearing is warranted.

Any public hearing determined by the Administrator to be held must be conducted in the geographical area of the facility or any other area the Administrator determines to be appropriate. All public hearings must be conducted in accordance with NAC 445A.403 through NAC 445A.406.

**E. Proposed Determination**

The Division has made the tentative determination to issue the Renewal Permit.

**F. Proposed Effluent Limitations, Schedule-of-Compliance and Special Conditions**

Refer to WPC Permit NEV0089016, Schedule of Compliance items I.B.1 through I.B.4.

**G. Rationale for Permit Requirements**

The facility is located in an area where annual evaporation is greater than annual precipitation and depth to groundwater is in excess of 1000 feet. Therefore, the facility must operate under a standard of performance that authorizes no discharge(s) except for excess accumulations that are a result of a storm event beyond that required by design for containment. Monitoring shall be in accordance with permit conditions.

**H. Federal Migratory Bird Treaty Act**

Under the Federal Migratory Bird Treaty Act, 16 U.S.C. 701-718, it is unlawful to kill migratory birds without license or permit, and no permits are issued to take migratory birds using toxic ponds. The Federal list of migratory birds (50 Code of Federal Regulations [CFR] 10, 15 April 1985) includes nearly every bird species found in the State of Nevada. The U.S. Fish and Wildlife Service is authorized to enforce the prevention of migratory bird mortalities at ponds and tailings impoundments. Compliance with state permits may not be adequate to ensure protection of migratory birds for compliance with provisions of Federal statutes to protect wildlife.

Open waters attract migratory waterfowl and other avian species. High mortality rates of birds have resulted from contact with toxic ponds at operations utilizing toxic substances. The Service is aware of two approaches that are available to prevent migratory bird mortality: 1) physical isolation of toxic water bodies through barriers (covering and netting), and 2) chemical detoxification. These approaches may be facilitated by minimizing the extent of toxic water. Methods which attempt to make uncovered ponds unattractive to wildlife are not always effective. Contact the U.S. Fish and Wildlife Service at 1340 Financial Blvd., Suite 234, Reno, Nevada 89502-7147, (775) 861-6300 for additional information.

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