PROPOSED DRAFT

Permit Type: Groundwater Discharge

Permit No. NS2017500

Nevada Division of Environmental Protection

AUTHORIZATION TO DISCHARGE

In compliance with Chapter 445A of the Nevada Revised Statutes (NRS),

NEW GENERATION SUPPLEMENTS
PO BOX 188
BELLE FOURCHE, SD - 57717

is authorized to discharge from a facility located at:

NEW GENERATION SUPPLEMENTS
1700 US 50 EAST, SILVER SPRINGS, NV - 89429
LATITUDE: 39.42083330, LONGITUDE: -119.217222
TOWNSHIP: T18N, RANGE: R25E, SECTION: S18

to receiving waters named:

GROUNDWATER OF THE STATE VIA PERCOLATION

in accordance with effluent limitations, monitoring requirements, and other conditions set forth in Sections A, B, and C hereof.

This permit shall become effective on January 01, 2025.

This permit and the authorization to discharge shall expire at midnight, December 31, 2029.

Signed this 31st day of December 2024.

Melissa Marr
Staff II Engineer
Bureau of Water Pollution Control

SECTION A

A.1. INTRODUCTION

A.1.1. The Permittee is requesting a permit for continued utilization of a processing wastewater evaporation pond located at 1700 US 50 East, Silver Springs, Lyon County, Nevada 89429. Depth to groundwater is 24 feet (Well Log #390494). The site is located at N 39.4208, W -119.2172, with the nearest residence located across U.S. 50, about 0.25 miles from the facility. New Generation Supplements (NGS) is an animal feed supplement manufacturing facility with process wastewater primarily consisting of molasses and processed water condensate. NGS has estimated generation of approximately 2,752,000 gallons of wastewater per annum, with the base assumptions of 12,800 tons animal feed production capacity @215 gallons of wastewater generated per ton. Wastewater is collected through four discharge points, vacuum pump (60%-70% of total effluent) at 6 gallons per minute (GPM), condensate pump at 2 GPM, conditioner/boiler (5%) and the rest from wash down of equipment. Domestic sewage, comprised of waste from employee bathrooms and sinks, discharges directly into the local sewer collection system and to Lyon County Utilities Department's Silver Springs Water Reclamation Facility (SSWRF)(permit NS0099012). NGS has completed the construction of one evaporation pond being 1.5 acres in size. BOD5 values of at various process wastewater point sources are significantly high, with the lowest being at 650 mg/L to highest at 2000 mg/L . TDS is similarly high with lowest 530 mg/L to highest 3000 mg/l. Typically pH ranged between 3.5 Standard Units (S.U.)and 5.5 S.U. Permittee will continue to implement the vector control plan and an odor control plan currently in place. The evaporation pond has been constructed with adequate double lining to eliminate possibility of effluent entering groundwater. In the event of leakage, or other spillage to ground, the effluent will be discharged into groundwater of the State via percolation.

A.2. EFFLUENT LIMITATIONS

A.2.1. There shall be no discharge from the facility property except as authorized by this permit.

A.2.2. There shall be no discharge of substances that would cause or contribute to an exceedance of water quality standards.

A.2.3. During the period beginning on the effective date of this permit, and lasting until the permit expires, the Permittee is authorized to:

discharge process water to a 1.5 acre evaporation pond . This permit prohibits the discharge of sewage and other non-process wastewater from entering into the evaporation pond .

Samples and measurements taken in compliance with the monitoring requirements specified below shall be taken at:

Sample Location	Location Type	Location Name
001	External Outfall	POND 1
002	Internal Outfall	POND 1 LEAK DETECTION

A.2.4. **Water Quality Standards:** There shall be no discharge of substances that would cause the groundwater quality to degrade below drinking water standards.

A.2.5. Visibility Parameters: There shall be no discharge of floating solids or visible foam in other than trace amounts.

A.2.6. Solid Waste Management: All solid, toxic, or hazardous waste shall be properly handled and disposed of pursuant to applicable laws and regulations. Any sludge generated during this operation shall be characterized and disposed of in accordance with local, State, and Federal regulations.

A.2.7. Presumption of Possession and Compliance: Copies of this permit, any subsequent modifications, and the O&M Manual shall be maintained at the permitted facility at all times.

A.2.8. Records Retention: All records and information resulting from the monitoring activities required by this permit, including all records of analyses performed and calibration and maintenance of instrumentation, and recordings from continuous monitoring instrumentation, shall be retained for a minimum of five (5) years, or longer if required by the Administrator.

A.2.9. Prerogative to Reopen: There shall be no discharge of substances that would cause a violation of water quality standards of the State of Nevada as defined by the permit. The permit may be reopened, and additional limits imposed, if it is determined that the discharge is causing a violation of ambient water quality standards of the State of Nevada.

A.2.10. The discharge shall be limited and monitored by the Permittee as specified below. As applicable, exceptions to standard language in this permit are identified and authorized in the Special Approvals / Conditions table.

Zero Discharge Limitations Table for Sample Location 001 (Pond 1 - External Outfall)
To Be Reported Quarterly

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
BOD, 5-day	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Solids, total suspended	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Solids, total dissolved	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
Oxygen, dissolved (DO)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	INSITU
Nitrogen, total	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Quarterly	DISCRT
pH	Daily Maximum		M&R Standard Units (SU)	Effluent Gross	001	Quarterly	INSITU
Flow rate	Daily Maximum	<= 0.050 Million Gallons per Day (Mgal/d)		Effluent Gross	001	Continuous	METER
Freeboard	Monthly Minimum		>= 3 Feet (ft)	See Footnote	001	Monthly	VISUAL

Zero Discharge Limitations Table for Sample Location 001 (Pond 1 Leak Detection - Internal Outfall) To Be Reported Once During The Permit Term[1]

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Alkalinity, bicarbonate (as CaCO3)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Alkalinity, carbonate (as CaCO3)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Aluminum, total (as Al)	Daily Maximum		<= 0.20 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Antimony, total (as Sb)	Daily Maximum		<= 0.006 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Arsenic, total (as As)	Daily Maximum		<= 0.010 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Barium, total (as Ba)	Daily Maximum		<= 2.0 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Beryllium, total (as Be)	Daily Maximum		<= 0.004 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Cadmium, total (as Cd)	Daily Maximum		<= 0.005 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Calcium, total (as Ca)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Chloride (as Cl)	Daily Maximum		<= 400 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Chromium, total (as Cr)	Daily Maximum		<= 0.10 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
			<= 1.0				

Zero Discharge Limitations Table for Sample Location 001 (Pond 1 Leak Detection - Internal Outfall) To Be Reported Once During The Permit Term[1]

Discharge Limitations				Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Copper, total (as Cu)	Daily Maximum		Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Fluoride, total (as F)	Daily Maximum		<= 4.0 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Iron, total (as Fe)	Daily Maximum		<= 0.60 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Lead, total (as Pb)	Daily Maximum		<= 0.015 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Magnesium, total (as Mg)	Daily Maximum		<= 150 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Manganese, total (as Mn)	Daily Maximum		<= 0.10 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Mercury, total (as Hg)	Daily Maximum		<= 0.002 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Potassium, total (as K)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Selenium, total (as Se)	Daily Maximum		<= 0.05 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Silver, total (as Ag)	Daily Maximum		<= 0.10 Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Sodium, total (as Na)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
			M&R				

Zero Discharge Limitations Table for Sample Location 001 (Pond 1 Leak Detection - Internal Outfall) To Be Reported Once During The Permit Term[1]

	Discharge Limitations			Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Sulfate (as S)	Daily Maximum		Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Thallium, total (as Tl)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT
Zinc, total (as Zn)	Daily Maximum		M&R Milligrams per Liter (mg/L)	Effluent Gross	001	Once Per Permit Term	DISCRT

Notes (Zero Discharge Limitations Table):

1. Constituents need to be analyzed for the dissolved fraction.

Ponds / Rapid Infiltration Basins for Sample Location 001 (Pond 1 - External Outfall) To Be Reported Annually

	Discharge Limitations			Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Sludge/Solids, depth[1]	Maximum[2]	<= 2.50 Feet (ft) [3]		See Footnote[4]	001	Annual[5]	VISUAL

Notes (Ponds / Rapid Infiltration Basins):

1. The Permittee shall use a method approved by NDEP to determine the sludge depth in its pond. The plan for monitoring the sludge depths shall be submitted with O&M Manual.
2. When sludge depths average 20-percent of the total depth of the pond, the Permittee shall submit to NDEP a plan to remove the sludge within two years.
3. The Permittee shall report the total depth of the pond and the depth of sludge.
4. The Permittee shall test the sludge depths at various spots in the pond that have been approved by NDEP.
5. The Permittee shall sample the sludge depths during the 3rd quarter.

Ponds / Rapid Infiltration Basins for Sample Location 002 (Pond 1 Leak Detection - Internal Outfall) To Be Reported Quarterly

	Discharge Limitations			Monitoring Requirements			
Parameter	**Base**	**Quantity**	**Concentration**	**Monitoring Loc**	**Sample Loc**	**Measurement Frequency**	**Sample Type**
Liner Leakage Rate[1]	Daily Maximum	<= 500 Gallons per Acre per Day (gal/acre/d)		Internal Monitoring Point	002	Monthly	METER

Notes (Ponds / Rapid Infiltration Basins):

1. See Section B.PB.5.5 of the permit for further information.

A.3. **Schedule of Compliance:** The Permittee shall implement and comply with the provisions of the schedule of compliance after approval by the Nevada Division of Environmental Protection (Division), including in said implementation and compliance, any additions or modifications, which the Division may make in approving the schedule of compliance. All compliance deliverables shall be addressed to the attention of the Bureau of Water Pollution Control.

A.3.1. The Permittee shall achieve compliance with the effluent limitations upon issuance of the Permit.

SOC – Schedule of Compliance Table

There are no Schedule of Compliance items

SA – Special Approvals / Conditions Table

Item #	Description
1	The Permittee shall test the sludge depths at various spots in the pond that have been approved by NDEP. When sludge depths average 20-percent of the total depth of the pond(s), the Permittee shall submit to NDEP a plan to remove the sludge within two years.
2	Permittee shall implement odor control plan and vector control plan as submitted in the permit application.

DLV– Deliverable Schedule for Reports, Plans, and Other Submittals

Item #	Description	Interval	First Scheduled Due Date
1	Quarterly DMRs	Quarterly	4/28/2025
2	Annual Report (see Section C.1.2 of the permit)	Annually	1/28/2026
3	Once during the Permit Term Report	Once during the permit term	1/28/2030

SECTION B

Site specific requirements, which prevail in the case of any inconsistency with the requirements in Section A, are on the following pages:

B.PB. Ponds and Basins:

B.PB.1. There shall be no objectionable odors emitted from the facility.

B.PB.2. The facility shall be fenced and posted.

B.PB.3. Facility Construction:

B.PB.3.1. All of the facility's industrial process and wastewater disposal systems shall be constructed in conformance with plans approved by the Division. All plans must be approved by the Division prior to the start of construction and must be stamped by a Professional Engineer licensed in the State of Nevada (NV P.E.). Change orders to the approved plans must be stamped by a NV P.E. and submitted to the Division for approval prior to implementation.

B.PB.3.2. Ponds shall be located and constructed so as to:

B.PB.3.2.1. Contain with no discharge the twenty five (25)-year/twenty four (24)-hour storm at said location; and

B.PB.3.2.2. Withstand with no discharge the one hundred (100)-year flood of said location.

B.PB.4. Pond Management:

B.PB.4.1. Inspections and maintenance, including the periodic removal of materials to restore capacity, shall be conducted in accordance with the accepted O&M Manual. Summaries of these activities shall be included in the quarterly reports.

B.PB.4.2. Damaged ponds or liners shall be repaired or the pond taken out of service. The Division shall be notified in writing within one week of discovery of a liner tear or hole, and a repair plan or abandonment plan shall be submitted within fourteen (14) days of discovery.

B.PB.4.3. The Permittee shall maintain a minimum freeboard of three (3) feet for ponds greater than one (1) acre. A freeboard of two (2) feet for ponds less than or equal to one (1) acre may be accepted as approved by the Division and as identified and authorized in the Special Approvals / Conditions table.

B.PB.4.4. Ponds shall have a staff gauge installed to indicate the water level depth. The water level in each pond shall be measured monthly and recorded in the operations logbook maintained at the site.

B.PB.5. When Present, Double Lined Leak Detection Systems:

B.PB.5.1. Leakage rates shall be reported in units of average gallons per day per acre, per pond.

B.PB.5.2. Upon written notification by the Division, any liquids accumulated in leak detection systems shall be sampled and analyzed in accordance with the requirements of Section A, as applicable. All leakage rates shall be reported with the Quarterly Report.

B.PB.5.3. The Leak Collection and Recovery System or LCRS (e.g., collection sump, pumps, collection media, etc.) shall be designed to remove the collected leakage at a rate equal to or greater than the maximum rate collected in the interstitial leak detection sump media and/or at a rate that prevents the overfilling of the LCRS sump.

B.PB.5.4. The leak detection metering system must allow for accurate recording of the daily volume of leakage through the primary liner.

B.PB.5.5. The maximum allowable leakage rate for the primary liner is 500 gallons/acre-day. The action leakage rates through the primary liner shall be as follows (note: a more restrictive action leakage rate schedule may be required on a case-by-case basis):

B.PB.5.6. Leak-detection monitoring wells may be required to assess leakage impacts to the environment.

B.PB.6. Closure:

B.PB.6.1. Sixty (60) days prior to closing any permitted pond, the Permittee shall submit a closure plan and schedule to the Division for review and approval.

B.PB.6.2. Upon approval of the closure plan by the Division, the Permittee shall implement the plan.

C.1. MONITORING AND REPORTING:

C.1.1. **Schedule:** Discharge Monitoring Reports (DMRs) shall be received by the 28th day of the month following the third month of each quarter (reporting period). Quarterly and annual reporting periods are based on the standard annual cycle, January 1 through December 31.

C.1.1.1 If required, all Annual, Biosolids Monitoring Report (BMR), Pretreatment, Total Inorganic Nitrogen (TIN), Salinity Control, and Whole Effluent Toxicity Testing (WET) annual reports are due as defined in the Deliverable Table (DLV).

C.1.1.2 An original signed copy of these, and all other reports required herein, shall be submitted to the State at the following address:

Nevada Division of Environmental Protection
Bureau of Water Pollution Control
901 South Stewart Street, Suite 4001
Carson City, Nevada 89701

C.1.2. **Annual Report:** The fourth quarter report shall contain plots of concentration (y-axis) versus date (x-axis) for each analyzed constituent identified in the Monitoring Table. The plots shall include data from the preceding five years, if available. Plotting is not required for any constituent that have routinely been below the detection limit or if less than three data points exist. Any data point from the current year that is greater than the limits identified in the applicable tables and conditions above must be explained by a narrative.

Once reporting through the Nevada NetDMR system has been performed for a continuous five year period annual plots are no longer required.

C.1.3. **Reporting:** Monitoring results obtained in accordance to the requirements of the permit, supporting laboratory data, and supporting documents shall be submitted through the Nevada NetDMR system.
https://netdmr.ndep.nv.gov/netdmr/public/home.htm

C.1.4. **Sampling and measurements:** Samples and measurements taken when required shall be representative of the volume and nature of the monitored discharge and must comply with any Division approved sampling plan as required by the Schedule of Compliance. Analyses shall be performed by a Nevada certified laboratory. Results from this lab must accompany the DMR. If no discharge occurs during the reporting period, report "no discharge" shall be indicated on the submitted DMR.

C.1.5. **Recording the Results:** For each measurement or sample taken pursuant to the requirements of this permit, the Permittee shall record the following information:

C.1.5.1. The exact place, date, and time of sampling;

C.1.5.2. The dates the analyses were performed;

C.1.5.3. The person(s) who performed the analyses;

C.1.5.4. The analytical techniques or methods used; and

C.1.5.5. The results of all required analyses.

C.1.6. **Additional Monitoring by Permittee:** If the Permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, and the results of such monitoring shall be included in the calculation and reporting of the values required in the Discharge Monitoring Report Form. Such increased frequency shall also be indicated.

C.1.7. **Test Procedures:** Test procedures for the analysis of pollutants shall conform to regulations (40 CFR, Part 136) published pursuant to Section 304(h) of the CWA, under which such procedures may be required unless other procedures are approved by the Division. Other procedures used may be:

C.1.7.1. Selected from SW-846;

C.1.7.2. Selected from 40 CFR 503; or

C.1.7.3. An alternate test procedure approved by the Division, Environmental Laboratory Services.

C.1.7.4. All laboratory analyses conducted in accordance with this discharge permit must have detection at or below the permit limits.

C.1.7.5. All analytical results must be generated by analytical laboratories certified by the Nevada Laboratory Certification Program

C.1.8. **Reporting Limits:** Unless otherwise approved by the Division, the approved method of testing selected for analysis must have reporting limits which are:

C.1.8.1. Half or less of the discharge limit; or, if there is no limit,

C.1.8.2. Half or less of the applicable water quality criteria; or, if there is no limit or criteria,

C.1.8.3. The lowest reasonably attainable using an approved test method.

C.1.8.4. This requirement does not apply if a water quality standard is lowered after the issuance of this permit; however, the Permittee shall review methods used and by letter notify the Division if the reporting limit will exceed the new criterion, and if so the Division may reopen the permit to impose new monitoring requirements.

C.2. **Operations and Maintenance (O&M) Manual:**

C.2.1. An O&M Manual shall be prepared and submitted to the Division for review and approval in accordance with the Division Operations and Maintenance Manual guidance (WTS-2).

C.2.2. The Permittee shall inspect the site at the frequency prescribed in the O&M Manual.

C.2.3. The Permittee shall maintain an operations logbook (hardcopy or electronic) on-site as referenced in the O&M Manual.

C.2.3.1. The logbook shall include the name of the operator, date, time, and general condition of the facility.

C.3. **Planned changes:** The Permittee shall give notice to the Division as soon as possible of any planned physical alterations or additions to the permitted facility and receive approval prior to commencing construction. Notice is required only when the alteration or addition to a permitted facility:

C.3.1. May meet one of the criteria for determining whether a facility is a new source (40 CFR 122.29 (b));

C.3.2. Could significantly change the nature or increase the quantity of pollutants discharged; or

C.3.3. Results in a significant change to the Permittee's sludge management practice or disposal sites.

C.4. **Anticipated non-compliance:** The Permittee shall give advance notice to the Division of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

C.5. **Change in Discharge:** All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the Permit. Any anticipated facility expansions or treatment modifications which will result in new, different, or increased discharges of pollutants must be reported by submission of a new application or, if such changes will not violate the effluent limitations specified in this Permit, by notice to the permit issuing authority of such changes. Any changes to the permitted treatment facility must comply with NAC 445A.The Permit may be modified to specify and limit any pollutants not previously limited.

C.6. **Facilities Operation-Proper Operation and Maintenance:** The Permittee shall at all times maintain in good working order and properly operate all treatment and control facilities, collection systems, and pump stations installed or used by the Permittee to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance/quality control procedures.

C.7. **Adverse Impact – Duty to Mitigate:** The Permittee shall take all reasonable steps to minimize the impact of releases to the environment resulting from noncompliance with any permit limitations specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the non-complying discharge. The Permittee shall carry out such measures, as reasonable, to prevent significant adverse impacts on human health or the environment. If the monitoring program (as required by this permit) identifies exceedances of ambient water quality standards at the boundary of any approved mixing zone, the Permittee

shall notify the Division of the exceedances and describe any mitigation measures being implemented as part of the quarterly monitoring report requirements.

C.8. Noncompliance, Unauthorized Discharge, Bypass and Upset

C.8.1. Any diversion, bypass, spill, overflow or discharge of treated or untreated wastewater from a permitted facility under the control of the Permittee is prohibited except as authorized by this permit. The Division may take enforcement action for a diversion, bypass, spill, overflow, or discharge of treated or untreated wastewater except as authorized by this permit. In the event the Permittee has knowledge that a diversion, bypass, spill, overflow or discharge not authorized by this permit is probable or has occurred, the Permittee shall notify the Division.

C.8.2. **Notification:** The Permittee is responsible for carrying out notification in the event of a diversion, bypass, spill, overflow or discharge not authorized by this permit with the following schedule;

C.8.2.1. **Immediately:** Permittee shall be responsible for the timely notification of potentially impacted downstream users for the protection of human health and the environment.

C.8.2.2. **Spill Hotline:** Notifying the Division through the NDEP Spill Hotline, 1-888-331-6337, as soon as practicable after the dispatch of emergency respondents and mitigating actions and no later than twenty-four (24) hours from the time of discovery.

C.8.2.3. **5-Day Report:** A written report shall be submitted to the Division within five (5) days of the discovery of a diversion, bypass, spill, overflow, upset, or discharge detailing the entire incident including;

C.8.2.3.1. Time and date of discharge;

C.8.2.3.2. Exact location and estimated amount of discharge;

C.8.2.3.3. Flow path and any bodies of water which the discharge contacts;

C.8.2.3.4. The specific cause of the discharge; and

C.8.2.3.5. The preventive and/or corrective actions taken.

C.8.3. The Permittee shall report all instances of noncompliance not reported under Section C.8. (Noncompliance, Unauthorized Discharge, Bypassing and Upset) at the time monitoring reports are submitted. The reports shall contain the information listed in Section C.8. (Noncompliance, Unauthorized Discharge, Bypassing and Upset).

C.8.4. **Bypass not exceeding limitations:** The Permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of the applicable Section of Section C.8. (Noncompliance, Unauthorized Discharge, Bypassing and Upset including Prohibition of Bypass).

C.8.5. **Anticipated bypass:** If the Permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible, at least ten days before the date of bypass.

C.8.6. **Prohibition of Bypass:** Bypass is prohibited, and the Division may take enforcement action against a Permittee for bypass, unless:

C.8.6.1. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

C.8.6.2. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment down time. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventative maintenance; and

C.8.6.3. The Permittee submitted notices as required under Section C.8. (Noncompliance, Unauthorized Discharge, Bypassing and Upset).

C.8.7. **Approved Bypass:** The Division may approve an anticipated bypass, after considering its adverse effects, if the Division determines that it will meet the three conditions listed in Section C.8.6.

C.8.8. **Effect of an upset:** An upset constitutes an affirmative defense to an action brought for noncompliance with such technology-based permit effluent limitations if the requirements of Section C.8 (Noncompliance, Unauthorized Discharge, Bypassing and Upset: Conditions necessary for a demonstration of an upset) are met.

C.8.9. **Conditions necessary for a demonstration of an upset:** A Permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, that:

C.8.9.1. An upset occurred and that the Permittee can identify the cause(s) of the upset;

C.8.9.2. The permitted facility was at the time being properly operated;

C.8.9.3. The Permittee submitted notice of the upset as required under this Section; and

C.8.9.4. The Permittee complied with any remedial measures required under Section C.8. (Noncompliance, Unauthorized Discharge, Bypassing and Upset).

C.8.10. **Enforcement:** In selecting the appropriate enforcement option, the Division shall consider whether or not the noncompliance was the result of an upset. The burden of proof is on the Permittee to establish that an upset occurred.

C.9. **Removed Substances:** Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be properly disposed as described in the SWMP.

C.10. **Right of Entry and Inspection:** The Permittee shall allow the Administrator and/or

his authorized representatives, upon the presentation of credentials, to:

C.10.1. Enter at reasonable times upon the Permittee's premises where an effluent source is located or in which any records are required to be kept under the terms and conditions of this permit;

C.10.2. Have access to and copy any records required to be kept under the terms and conditions of this permit at reasonable times;

C.10.3. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations required in this permit; and

C.10.4. Perform any necessary sampling or monitoring to determine compliance with this permit at any location for any parameter.

C.11. **Transfer of Ownership or Control:** In the event of any change in control or ownership of facilities from which the authorized discharge emanates, the Permittee shall notify the succeeding owner or controller of the existence of this permit, by letter, a copy of which shall be forwarded to the Division. The Division may require modification or revocation and reissuance of the permit to change the name of the Permittee and incorporate such other requirements as may be necessary. The Division shall approve ALL transfers of permits.

C.12. **Availability of Reports:** Except for data determined to be confidential under NRS 445A.665, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the office of the Division. As required by the CWA, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of criminal penalties as provided for in NRS 445A.710.

C.13. **Furnishing False Information and Tampering with Monitoring Devices:** Any person who intentionally or with criminal negligence makes any false statement, representation, or certification in any application, record, report, plan or other document filed or required to be maintained by the provisions of NRS 445A.300 to 445A.730, inclusive, or by any permit, rule, regulation or order issued pursuant thereto, or who falsifies, tampers with or knowingly renders inaccurate any monitoring device or method required to be maintained under the provisions of NRS 445A.300 to 445A.730, inclusive, or by any permit, rule, regulation or order issued pursuant thereto, is guilty of a gross misdemeanor and shall be punished by a fine of not more than $10,000 or by imprisonment. This penalty is in addition to any other penalties, civil or criminal, provided pursuant to NRS 445A.300 to 445A.730, inclusive.

C.14. **Penalty for Violation of Permit Conditions:** NRS 445A.675 provides that any person who violates a permit condition is subject to administrative and judicial sanctions as outlined in NRS 445A.690 through 445A.705, inclusive.

C.15. **Permit Modification, Suspension or Revocation:** After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:

C.15.1. Violation of any terms or conditions of this permit;

C.15.2. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts;

C.15.3. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge;

C.15.4. A determination that the permitted activity endangers human health or the environment and can only be regulated to acceptable levels by permit modification or termination;

C.15.5. Material and substantial alterations or additions to the permitted facility or activity;

C.15.6. The Division has received new information;

C.15.7. The standards or regulations have changed; or

C.15.8. The Division has received notification that the permit will be transferred.

C.16. **Minor Modifications:** With the consent of the Permittee and without public notice, the Division may make minor modifications in a permit to:

C.16.1. Correct typographical errors;

C.16.2. Clarify permit language;

C.16.3. Require more frequent monitoring or reporting;

C.16.4. Change an interim compliance date in a schedule of compliance, provided the new date is not more than 120 days after the date specified in the permit and does not interfere with attainment of the final compliance date;

C.16.5. Allow for change in ownership;

C.16.6. Change the construction schedule for a new discharger provided that all equipment is installed and operational prior to discharge;

C.16.7. Delete an outfall when the discharge from that outfall is terminated and does not result in discharge of pollutants from other outfalls except in accordance with permit limits; or

C.16.8. Reallocate the IWLA as long as the ΣIWLA does not change.

C.17. **Toxic Pollutants:** Notwithstanding Section C (Permit Modification, Suspension or Revocation), if a toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under Section 307(a) of the CWA for a toxic pollutant which is present in the discharge and such standard or prohibition is more stringent than any limitation for such pollutant in this permit, this permit shall be revised or modified in accordance with the toxic effluent standard or prohibition and the Permittee so notified.

C.18. **Liability:** Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the Permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable Federal, State or local laws, regulations, or ordinances. However, except for any toxic effluent standards and prohibitions imposed under Section 307 of the CWA or toxic water quality standards set forth in NAC 445A.144, compliance with this permit constitutes compliance with CWA Sections 301, 302, 306, 307, 318, 403, 405(a) and (b), and with NRS 445A.300 through 445A.730, inclusive.

C.19. **Property Rights:** The issuance of this permit does not convey any property rights, in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

C.20. **Severability:** The provisions of this permit are severable, and if any provision of this permit, or the application of any provisions of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

C.21. **Duty to Comply:** The Permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the CWA and is grounds for enforcement action; permit termination; revocation and reissuance, or modification; or denial of a permit renewal application.

C.22. **Need to Halt or Reduce Activity Not a Defense:** It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with this permit.

C.23. **Duty to Provide Information:** The Permittee shall furnish to the Division, within a reasonable time, any relevant information which the Division may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Division, upon request, copies of records required to be kept by this permit.

C.24. **Other information:** Where the Permittee becomes aware of failure to submit any relevant facts in a permit application or the submittal of incorrect information in a permit application or in any report to the Division, the Permittee shall promptly submit such facts or information.

C.25. **Reapplication:** If the Permittee desires to continue to discharge, he shall reapply not later than 180 days before this permit expires on the application forms then in use. The Permittee shall submit the sludge information listed in 40 CFR 501.15(a)(2) with the renewal application. The renewal application shall be accompanied by the fee required by NAC 445A.232.

C.26. **Signatures, Certification Required on Application and Reporting Forms:** All applications, reports, or information submitted to the Division shall be signed and certified by making the following certification. “I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly

gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

C.26.1. All applications, reports or other information submitted to the Division shall be signed by one of the following:

C.26.2. A principal executive officer of the corporation (of at least the level of vice president) or his authorized representative who is responsible for the overall operation of the facility from which the discharge described in the application or reporting form originates;

C.26.3. A general partner of the partnership;

C.26.4. The proprietor of the sole proprietorship; or

C.26.5. A principal executive officer, ranking elected official or other authorized employee of the municipal, state or other public facility.

C.27. **Changes to Authorization:** If an authorization under Section C.25 (Signatures, Certification Required on Application and Reporting Forms) is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of Section C.25 (Signatures, Certification Required on Application and Reporting Forms) must be submitted to the Division prior to or together with any reports, information, or applications to be signed by an authorized representative.

C.28. **Definitions:**

25-year, 24-hour storm event means a precipitation event with a probable recurrence interval of once in twenty-five years, as defined by the National Weather Service in Technical Paper No. 40, "Rainfall Frequency Atlas of the United States," May, 1961, or equivalent regional or State rainfall probability information developed from this source.

100-year, 24-hour storm event means a precipitation event with a probable recurrence interval of once in one hundred years, as defined by the National Weather Service in Technical Paper No. 40, "Rainfall Frequency Atlas of the United States," May, 1961, or equivalent regional or State rainfall probability information developed from this source.

Acute Toxicity means the concentration that is lethal to 50 percent of the test organisms within 96 hours.

Agricultural land means land on which a food crop, a feed crop, or a fiber crop is grown. This includes rangeland and land used as pasture.

Agronomic rate means the whole sludge application rate (dry weight basis) designed: To provide the amount of nitrogen needed by the food crop, feed crop, fiber crop, cover crop, or vegetation grown on the land; and to minimize the amount of nitrogen that passes below the root zone of the crop or vegetation grown on the

land to the groundwater.

Biosolids are non-hazardous sewage sludge or domestic septage.

Bypass means the intentional diversion of waste streams from any portion of a treatment facility.

Chronic precipitation event means a series of wet weather conditions that precludes reducing the volume of properly designed, constructed, operated, and maintained waste storage and/or treatment facilities and that total a volume in excess of the 25-year, 24-hour storm event.

Composite Sample (for flow-rate measurements) sample means the arithmetic mean of no fewer than six individual measurements taken at equal time intervals for 24 hours, or for the duration of discharge, whichever is shorter.

Discrete sample means any individual sample collected in less than 15 minutes.

Feed crops means crops produced primarily for consumption by animals.

Food crops means crops consumed by humans. These include, but are not limited to, fruits, vegetables, and tobacco.

Land application means the spraying or spreading of sewage sludge onto the land surface; the injection of sewage sludge below the land surface; or the incorporation of sewage sludge into the soil so that the sewage sludge can either condition the soil or fertilize crops or vegetation grown in the soil.

Land application area means land under the control of the Permittee, whether it is owned, rented, or leased, to which manure or process wastewater from the production area is or may be applied.

Manure means animal excrement and is defined to include bedding, compost, and raw materials or other materials commingled with animal excrement or set aside for disposal.

Process wastewater means water directly or indirectly used in the operation of the facility.

Sewage sludge means solid, semi-solid, or liquid residue generated during the treatment of domestic sewage in a treatment works. Sewage sludge includes, but is not limited to, scum or solids removed in primary, secondary, or advanced wastewater treatment processes; and a material derived from sewage sludge. Sewage sludge does not include ash generated during the firing of sewage sludge in a sewage sludge incinerator or grit and screening generated during preliminary treatment of domestic sewage in a treatment works.

Upset means an exceptional incident in which there is unintentional and temporary noncompliance with permit effluent limitations because of factors beyond the reasonable control of the Permittee. An upset does not excuse noncompliance to the extent caused by operational error, improperly designed include treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

Vegetated buffer means a permanent strip of dense perennial vegetation

established parallel to the contours of and perpendicular to, the dominant slope for the purposes of slowing water runoff, enhancing water infiltration, and minimizing the risk of any potential pollutants leaving being released.

Odor Control Plan

New Generation Supplements
Lined Wastewater Holding and Evaporation Pond

1700 US 50 East
Silver Springs, NV 89429

September 2016

1.0 Introduction

New Generation Supplements (NGS) is a manufacturing facility located in Silver Springs, Nevada on Highway 50 East making livestock feed products. The facility is located within an industrial/commercial area located along the north side of Hwy 50 and east of the intersection of Hwy 50A. NGS acquired the existing facility, which was previously owned and operated by Vaquero Supplements who manufactured a similar livestock feed product. A holding pond was permitted at this site by NDEP, but was not constructed prior to NGS acquiring the facility. NGS has made significant improvements to the facility, including installation of a new indoor production process, installation of gravity sewer outfall to the local sewer collection system and overall clean-up of the existing site, which previously disposed of liquid production waste on-site via land application (Reference Spill Investigation Report by NDEP Bureau of Water Pollution Control dated October 27, 2008).

Prevailing winds across the NGS site are predominantly from the west to the east. Existing adjacent downwind facilities include two residential structures approximately 1,500 feet from the proposed NGS lagoon. Commercial properties are located a little over a mile to the northeast. The Silver Springs Water Reclamation Facility (SSWRF) including sludge and effluent holding ponds is located approximately 1,600 feet to the south. Local residential structures are located approximately 1,200 feet to the southwest across Hwy 50. The afternoon winds typical of the local climate will help to dissipate any odors from the facility.

2.0 Description of Facility

The NGS facility in Silver Springs produces low-moisture feed blocks for the livestock industry. Production generally consists of combining dry grains and nutritional supplements with cane molasses to produce the livestock feed blocks. The combined ingredients are mixed and heated in a cooking vessel where moisture is removed until the desired consistency of the product is achieved and product packaging can begin. Odor from the manufacturing process comes from cooking molasses. Molasses has a characteristically sweet smelling aroma, which is normally not considered unpleasant. Molasses odors from the manufacturing process are generally contained in, around and near the manufacturing process.

Liquid waste from the manufacturing process discharges into a floor drain system at various locations throughout the facility. The floor drain system routes all waste flow to a pretreatment interceptor vault, which consists primarily of coarse particulate separation. After pretreatment the wastewater is discharged to disposal. Currently, process wastewater is contained in holding tanks and is ultimately shipped off-site for land applied disposal provided by a private wastewater pumping and disposal service. NGS plans to eliminate off-site wastewater hauling and implement local disposal, with approximately 60% of wastewater sent to the SSWRF for treatment and the remainder disposed of onsite into a 1.5 acre evaporation pond.

Inspection of the manufacturing facility finds the operations not excessively odorous. Molasses odors are typically light on the senses; you have to be near cooking equipment to encounter stronger odors. Odors farther away from manufacturing equipment dissipate quickly. Odors are normally unnoticeable outside of structures and surroundings areas. Coarse screenings from

the interceptor vault will be removed by a pumping service; any odors from this process are isolated around the pumper truck. Any odorous solid waste will be disposed of in an enclosed trash dumpster. The trash dumpster will be serviced regularly and material will be hauled to landfill by the local solid waste management company

3.0 Odor Control Strategies

The overall objective of odor control and management is to maintain a properly-functioning facility, operate a clean and efficient system to eliminate and reduce excess odors, contain process odors inside to allow for dissipation before release to the environment, maintain a clean and oxygenated pond and to maintain acceptable odor levels inside and outside the facility in accordance with regulatory standards.

There are several approaches to minimizing the release of odors for dewatering operations including minimizing turbulence or agitation in the operation, reducing exposure of process material to the atmosphere and keeping the facility clean. Strategies for limiting, controlling and monitoring odors are as follows:

- Practice good housekeeping at all times and train employees to operate production equipment with cleanliness and odor control in mind. Wash down water and hoses will be provided through the work area; routine wash down will be a standard operating procedure.

- Promptly dispose excess production solids in closed waste containers.

- Keep pumper truck connections to holding tanks and the interceptor vault secure to minimize odor exposure.

- Use holding tanks to contain any unusually concentrated molasses base liquid waste, which can be diluted prior to SSWRF or evaporation pond disposal. A masking agent or other odor neutralizer could be added if this material that is susceptible to excessive odor generation.

- Maintain proper pH in the waste sent to the evaporation pond. A pH just above neutral will help promote oxidization of odorous organic compounds.

- Aerate the evaporation pond to provide biological oxidation. Airing out pond contents, especially in sunlight, can dissipate odors. Aeration also promotes healthy biochemical oxidation and reduces organic decomposition, which also helps eliminate odors.

- Keep the surface of the evaporation clean. Remove any material that will collect and concentrate surface debris and become malodorous.

- Monitor odors and address any complaints. Prepare for future odor control measures to mitigate complaints that could include addition of an oxidizing agent such as sodium hypochlorite, installation of ozone generation or carbon adsorption equipment.

Vector Control Plan

New Generation Supplements
Lined Wastewater Holding and Evaporation Pond

1700 US 50 East
Silver Springs, NV 89429

September 2016

1.0 Introduction

New Generation Supplements (NGS) is a manufacturing facility located in Silver Springs, Nevada on Highway 50 East and east of the intersection of Hwy 50A. The NGS facility produces low-moisture feed blocks for the livestock industry. Production generally consists of combining dry grains and nutritional supplements with cane molasses to produce livestock feed block products. Liquid waste from the manufacturing process is channeled into a drain system that outfalls to a pretreatment interceptor vault, which consists primarily of coarse particulate separation. After pretreatment the wastewater is discharged to disposal. Currently, process wastewater is contained in holding tanks, which is then shipped off-site for land applied disposal provided by a private wastewater pumping and disposal service. NGS plans eliminate off-site wastewater hauling and implement local disposal, with approximately 60% of wastewater sent to the SSWRF for treatment and the remainder disposed of onsite into a 1.5 acre evaporation pond. Wastewater from the process is characterized by its soluble sugar content and lack of suspended solids.

The pond will be a double lined wastewater holding and evaporation pond designed and constructed in accordance with NDEP Bureau of Water Pollution Control Guidance Document TWC-37. Operation and maintenance of this pond is the primary consideration of this Vector Control Plan.

2.0 Vector Control Management

Implementing vector control management practices will reduce vector populations, help protect public health and lower long term pond maintenance costs. Vector control management is typically comprised of three core functions:

- Surveillance – includes routine pond inspection and observation to identify the presence and abundance of vectors and the development of any conditions that could contribute to increased vector production.

- Control – includes performance of routine maintenance functions that control the conditions that attract vector populations and promote vector development by reducing or eliminating breeding areas, increasing the efficiency of biological controls or implementing the use of chemical controls.

- Response – includes the appropriate response to reduce or eliminate vector infestations should they arise.

A vector means any insect or other animal capable of transmitting the causative agent of human disease or capable of producing human discomfort or injury. Vectors are typically source specific and can vary at each site depending on conditions found at the site. The holding and evaporation pond provides opportunities for water borne insects, such as mosquitoes, and insects that could be attracted to the sugary content of the wastewater, such as flies and bees, or those that are seeking a water source for colony development, like bees. The earthen pond berms can also be attractive to burrowing rodents.

3.0 Vector Control Strategies

Vectors attracted to the pond may include mosquitoes, burrowing rodents, flies and bees.

Mosquitoes

Mosquito activity can significantly impact the quality of life of the public. There are several species of mosquitoes in Northern Nevada that are component vectors of the West Nile virus. Each species of mosquitoes has different habitat requirements and behaviors that effect its ability to bite humans and transmit disease. However, all mosquitoes share a similar life cycle with an aquatic stage (larvae) and an aerial stage (adult). Control is typically focused on managing the aquatic stage of the mosquito by creating conditions less favorable for mosquito larva development. NGS can reduce or eliminate mosquito development by implementing the following control strategies:

- Eliminate any stagnant or standing water around the site.
- Use mechanical aerators in the pond to keep the water surface in motion.
- Promptly remove any floating debris that could collect on the pond surface and in the pond corners and provide a calm zone for larva to develop.
- Do not allow any emergent vegetation to get established along the edges of the water surface (the pond liner should prevent this from occurring).
- If necessary, use pesticides to control persistent mosquito populations.

Burrowing Rodents

Burrowing rodents and small mammals, including rabbits, squirrels, gophers and mice, could take up residence around the pond by digging burrows in the earth berms. The elevated berms offer broader views of their environment and predators; and the pond can be a water source. Burrow networks threaten the structural integrity of the earth berm, which can lead to excessive erosion and potential leakage. Burrows are often found near plant root systems. Food sources for these animals is provided from the surrounding sage brush habitat and includes grasses, plants and seeds. NGS can reduce or eliminate the presence of burrowing rodents and small mammals by implementing the following control strategies:

- Keep earthen pond berms free of vegetation. Remove emergent vegetation promptly.
- Use a natural herbicide as part of routine maintenance. Apply seasonally or as recommended by the herbicide manufacturer.
- Routinely inspect pond berms and surrounding area for animal burrows.
- Regularly inspect the perimeter fence and look for animal pathways going under the chain link fence. Small mesh fencing may need to be installed along the bottom of the chain link fence and into the ground to prevent access under the chain link fence.
- Place traps to capture and remove animals. Avoid poisoning as dead and decaying animals create odor and fly problems.
- Plug and fill empty burrows with sand and gravel.
- Contact the Nevada Department of Wildlife at (775) 688-1506 if burrowing rodents and small mammals become a persistent problem at the facility.

Flies

Flies feed on a wide range of food sources including organic waste products. Flies have an amazing reproductive capability that allows them to produce tremendous populations when optimal environmental conditions are present and quickly become nuisance pests. Some fly larva can live in stagnant water, but typically flies require other types of organic matter sources to feed and develop larva. NGS can reduce or eliminate fly development by implementing the following control strategies:

- Keep the site clean of organic breeding sources, such as wild horse droppings.
- Remove or eliminate fly breeding sources.
- If necessary, use pesticides to control persistent fly infestations.

Bees

Bees are an important and beneficial part of the ecosystem and the agricultural community. While protecting bees is important, it does not mean that we need to share their living space. Bee species include bumble bees, carpenter bees and honey bees, with honey bees being more predominant in Northern Nevada. Africanized honey bees have not well documented as being present in Lyon County, but they have been spotted in southern portions of Nevada and are moving north. Honey bees will be attracted to the sugary content the NGS process wastewater, but will drown in pooled water. Bees have been previously noted as being prevalent at the site when the prior operator land applied molasses based waste product. Honey bees are colony bees and tend to build their hives in tree hallows and manmade structures near their food sources, but will travel up to two miles or more to forage. Honey bees are generally not aggressive, but will get aggravated and sting when their hives are disturbed. Wasps resemble bees, but are more aggressive. Wasps, hornets, and yellow jackets may also be attracted to the pond environment. NGS can reduce or eliminate excessive bee development by implementing the following control strategies:

- Learn to live with some bees. Keep the pond surface free of any floating debris that could collect on the pond surface and in the pond corners, which could be used by bees to more easily get to the water source in the pond.
- Be on the watch for increased bee activities around the evaporation pond and surrounding areas. More bees could mean new local colony development.
- Pesticides can be used around the pond if bee activity becomes a nuisance.
- Regularly inspected the facility grounds, including building and equipment enclosures, and inside the pond transfer manhole and other areas that would provide an ideal location for colony development.
- Small be hives and colonies can be removed and eliminated by using a pesticide. A professional exterminator should be used for this task.
- Use a service to capture, rescue, remove and relocate larger colonies or swarms.
- Where proper clothing and dress protectively when dealing with bees and removing bee hives.
- For swarm control and bee rescue contact the Northern Nevada Beekeepers Association at www.northernnevadabeekeepersassociation.org.