



## MOWING PLAN

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for Tammy Courtney  
Project Manager

Effective Date: 12/9/19

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## REVISION SUMMARY

Rev. No.	Description of Change	Pages	Date
<b>0</b>	<b>Initial Release</b> – DE-EM0003733, Paducah Infrastructure Support Services Contract.	All	12/1/15
<b>1</b>	Reconcile DOE comments.	14, 15, 18, 19 and 20	12/1/15
<b>2</b>	Mowing schedule updated to add outfall access points	Attachment A	4/26/16
<b>3</b>	Mowing schedule updated for 2017 mowing season	Attachment A	11/10/16
<b>4</b>	Reconcile DOE comments.	V, 1,11	5/12/16
<b>5</b>	Reconcile DOE comments. Revised mowing schedule. Added new maps to plan for new mowing zones, outfall sampling locations, surface water and seep monitoring locations, and semiannual sediment locations.	Attachment A 5,7,8,10,11 12,13	7/7/17
<b>6</b>	New Mowing for 2018.	All	11/15/17
<b>7</b>	New Mowing Plan for 2019. General update. Updated Attachment A. Formatted into new template, previous NO. SSI.OM-0006.	All	08/16/18
<b>8</b>	Reconcile DOE Comments.	All	10/18/18
<b>9</b>	Updated Attachment A. Mowing schedule 2020.	19 – 24	11/12/19

## ACRONYM LIST

AHA	Activity Hazard Assessment
CAAS	Criticality Accident Alarm System
CMMS	Computerized Maintenance Management System
DOE	U.S. Department of Energy
D&R	Deactivation & Remediation
DUF <sub>6</sub>	Depleted Uranium Hexafluoride
NESHAP	National Emission Standards for Hazardous Air Pollutants
O&M	Operations and Maintenance
OEM	Original Equipment Manufacturer
PGDP	Paducah Gaseous Diffusion Plant
PM	Preventive Maintenance
QASP	Quality Assurance Surveillance Plan
SST	Swift & Staley Team
USDA	U.S. Department of Agriculture
USW	United Steel Workers

## **1.0 INTRODUCTION**

Swift & Staley Inc. (hereinafter referred to as Swift & Staley Team [SST]) will provide grounds maintenance, including grass cutting, edging, grass trimming, fertilizing, policing grounds for trash, leaf removal, inspections, and perform minor repairs for all of the Paducah Gaseous Diffusion Plant (PGDP) Site facilities in accordance with the performance work statement in DE-EM0003733, Paducah Infrastructure Support Services Contract.

The U.S. Department of Energy (DOE) owns a total of 3,556 acres at the PGDP. Six hundred and fifteen (615) acres have been restricted within the designated Limited Area, and approximately eight hundred and twenty two (822) acres of uninhabited “buffer zone” surrounding the PGDP Site. The remainder is leased to the Commonwealth of Kentucky.

### **1.1 Scope**

SST will perform grounds maintenance activities including, but not limited to the following: grass cutting, edging, grass trimming, fertilizing, policing grounds for trash, removing leaves, inspecting and performing minor repairs. These activities are classified as Level I Scheduled/Preventative Maintenance (PM) and, Level II Service Order Maintenance. Activities that exceed the Level II Service Order limit of liability will be addressed through the Indefinite Delivery, Indefinite Quantity process.

### **1.2 Purpose**

The purpose of these activities is to provide a healthy and safe working environment, and provide a professional, aesthetically pleasing work site for the PGDP Site personnel.

## **2.0 MOWING PROGRAM REQUIREMENTS**

### **2.1 Requirements for All Zones/Areas**

#### **2.1.1 ENVIRONMENT, SAFETY, AND HEALTH**

Grounds maintenance activities have associated risks of injury and environmental damage. Examples of injury risks include temperature extremes, unsafe terrain, and equipment-related hazards. Environmental damage may occur from spills or improper use of chemicals (e.g., herbicides). As a function of the SST Integrated Safety Management System, work scopes are defined and reviewed to identify potential hazards. With input from those performing grounds maintenance activities, controls are established to minimize associated risks. These hazards and controls are documented in an Activity Hazard Assessment (AHA) and reviewed with workers. Through employee feedback, additional hazards and controls are included in the AHA as needed. Workers are encouraged to suspend or stop work if risks are identified that are not properly controlled.

### 2.1.2 DEBRIS REMOVAL

SST will remove any trash, paper, or other debris prior to mowing/cutting that detracts from the finished appearance of the area, or presents a safety hazard. Such debris includes but is not limited to: paper, cigarette butts, cans, bottles, limbs, leaves, fallen trees, and other objects within the maintenance area; and will include debris lodged in shrubs, hedges, fences, and along foundations and other walls or structures.

### 2.1.3 TRIMMING

SST will trim grass/vegetation around utilities, fences, utility poles, lightning protection poles, guy wires, Criticality Accident Alarm System (CAAS) flagging boxes, sign posts, fire hydrants, buildings, electrical structures, plastic and concrete jersey barriers, and parking lot bumpers. The grass/vegetation will be cut and maintained at a height consistent with the adjacent grass, or if standing alone, cut to maximum six inches height and to a radius of three feet around.

### 2.1.4 DEEP DITCHES

SST will control the height of vegetation in accordance with the mowing zone map and zone requirements.

### 2.1.5 CLIPPINGS REMOVAL

SST will remove or blow off grass clippings and leaves (not trash) deposited by mowing operations from sidewalks, concrete porches, building aprons, streets, etc. In periods of high wind, this work may be delayed until winds subside to prevent the clippings from accumulating on these areas.

### 2.1.6 COORDINATION

SST will coordinate with the other Site contractors prior to the performance of work activities that might impact their operations.

### 2.1.7 SCALPING

SST will minimize scalping, uneven mowing, or rutting by the equipment through training of personnel, maintenance of equipment, and consideration of mowing conditions (e.g., recent heavy rains, standing water). Some unevenness and scalping may be unavoidable due to the terrain and limitations of mowing equipment. SST will take care not to damage trees and shrubs in the identified areas.

## **2.2 Level I Scheduled/Preventive Maintenance Mowing**

### **2.2.1 DAMAGE**

SST will notify DOE and any impacted Site contractor and provide a condition report of any existing damages to PGDP facility assets prior to commencing work. Any damages to PGDP facility assets (i.e., utility poles, signposts, CAAS flagging boxes, power outlets, telephone pedestals, fire hydrants, grounding system wires, wire molding, ground rods, and guy wires) will be reported within one working day of the incident. All repairs/replacements of damage to PGDP facility assets will be at SST expense.

## **2.3 Level II Mowing Service Orders**

### **2.3.1 DAMAGE**

SST will notify DOE and any impacted Site contractor and provide a condition report of any existing damages to PGDP facility assets prior to commencing work. Any damages to PGDP facility assets (i.e., utility poles, signposts, power outlets, telephone pedestals, fire hydrants, grounding system wires, wire molding, ground rods and guy wires) will be reported within one working day of the incident. All repairs/replacements of damage to PGDP facility assets will be at SST's expense.

## **2.4 Performance Standards**

Grounds maintenance performance standards, minimum acceptable quality levels, and surveillance methods are described in the Quality Assurance Surveillance Plan (QASP). SST will notify DOE in advance when conditions outside SST control may affect SST's ability to comply with the stated performance standards.

## **3.0 PRE-SEASON PLANNING**

### **3.1 Materials and Equipment**

SST will utilize the following types of equipment and materials in order to execute the activities listed here in compliance with the minimum acceptable quality levels and QASP requirements:

- 75 horsepower (hp) -150hp tractors with batwing-type bush hog and rotary disc cutter attachments
- Excavator mounted rotary forestry head attachment
- Skid steer mounted brush cutter attachment
- Commercial zero-turn mowers
- Commercial finish mowers
- Powered string trimmers
- Powered walk behind edger
- Miscellaneous hand tools such as shovels, rakes, brooms, etc.
- Government-approved environmentally friendly herbicides and fertilizer

- Herbicide application equipment, including equipment mounted spray rigs. Only personnel licensed as U.S. Department of Agriculture (USDA) pesticide applicators/operators will apply herbicide at the PGDP Site.

### **3.2 Vehicle and Equipment Preparation**

SST performs PM on all grounds maintenance equipment in accordance with original equipment manufacturer (OEM) recommendations and SST procedures. Equipment maintenance is tracked and documented using the Computerized Maintenance Management System (CMMS) Maximo® program.

### **3.3 Annual Hazard Assessment Walk-Down**

SST will perform annual walk-downs to identify and mark obstructions, hazards, and visibility issues for mowing equipment operators. SST will identify areas where specialized maintenance is needed (e.g., string trimmers must be used rather than mowers, areas where herbicide can and cannot be used). These areas will be identified on Hazards Map(s) that will be available for review by all grounds maintenance crew members prior to beginning any grounds maintenance activities.

### **3.4 Annual Meeting with U.S. Department of Energy and Site Contractors**

SST will coordinate an annual meeting with DOE and all Site contractors prior to the start of the grounds maintenance mowing season. The meeting will be used to:

- communicate mowing zones and requirements;
- solicit input from the contractors on the PGDP Site;
- discuss additional needs and changes in priorities;
- review lessons learned from the previous mowing season;
- remind contractors to take precautions to avoid leaving equipment and materials in areas that may become heavily overgrown with grass; and
- coordinate and schedule mowing activities in order to keep potential operational impacts to a minimum.

### **3.5 Mowing Zones**

Mowing frequencies and specific requirements for each mowing zone will be performed per Section C of the contract and the PGDP Mowing Zone Map latest revision, as shown on Figure 1-4.

**NOTE:** The mound east of the depleted uranium hexafluoride (DUF<sub>6</sub>) facility is excluded from any mowing requirements.

### 2017 PGDP MOWNG ZONES - Rev. 4

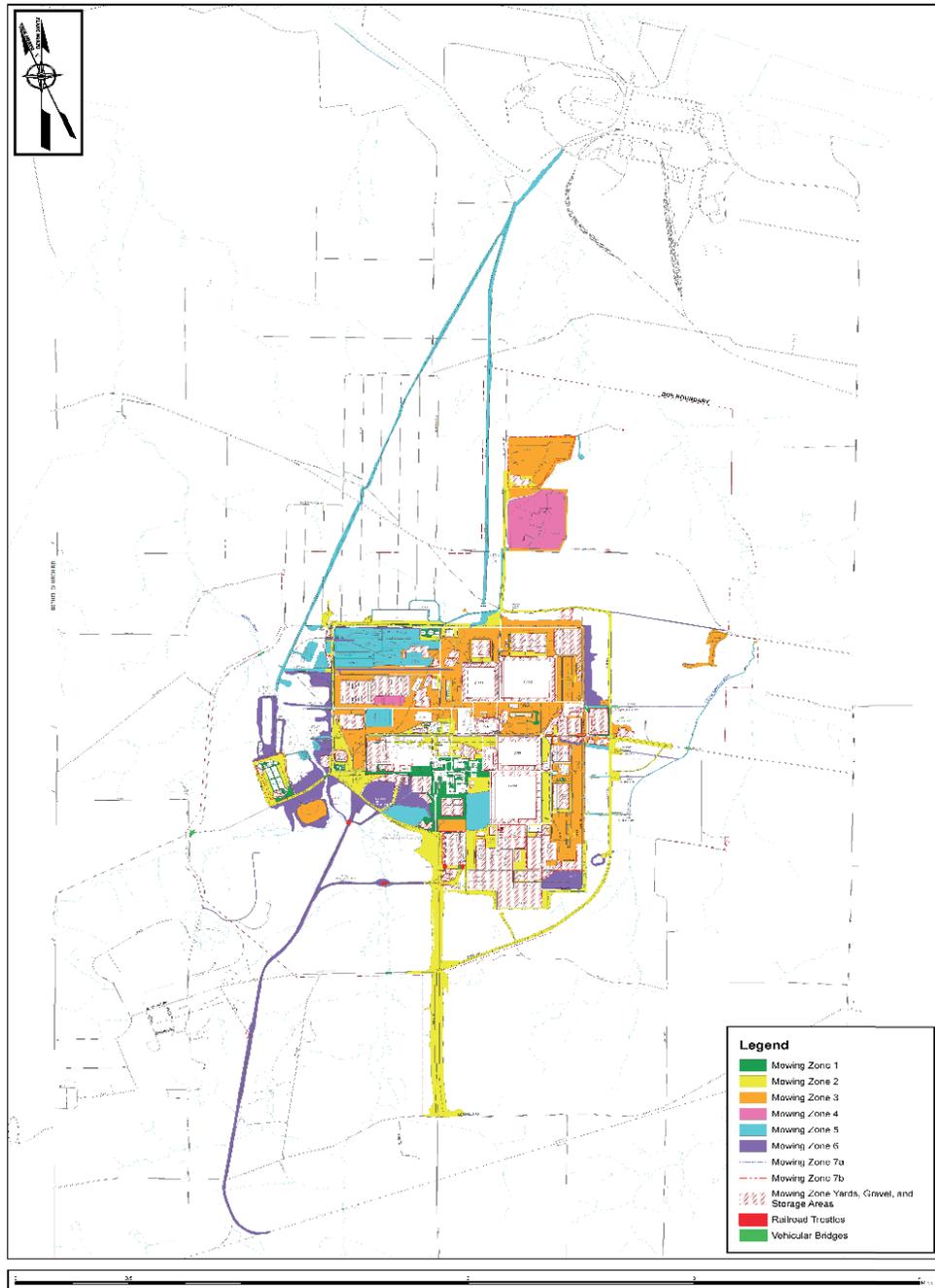


Figure 1 Mowing Zone Map

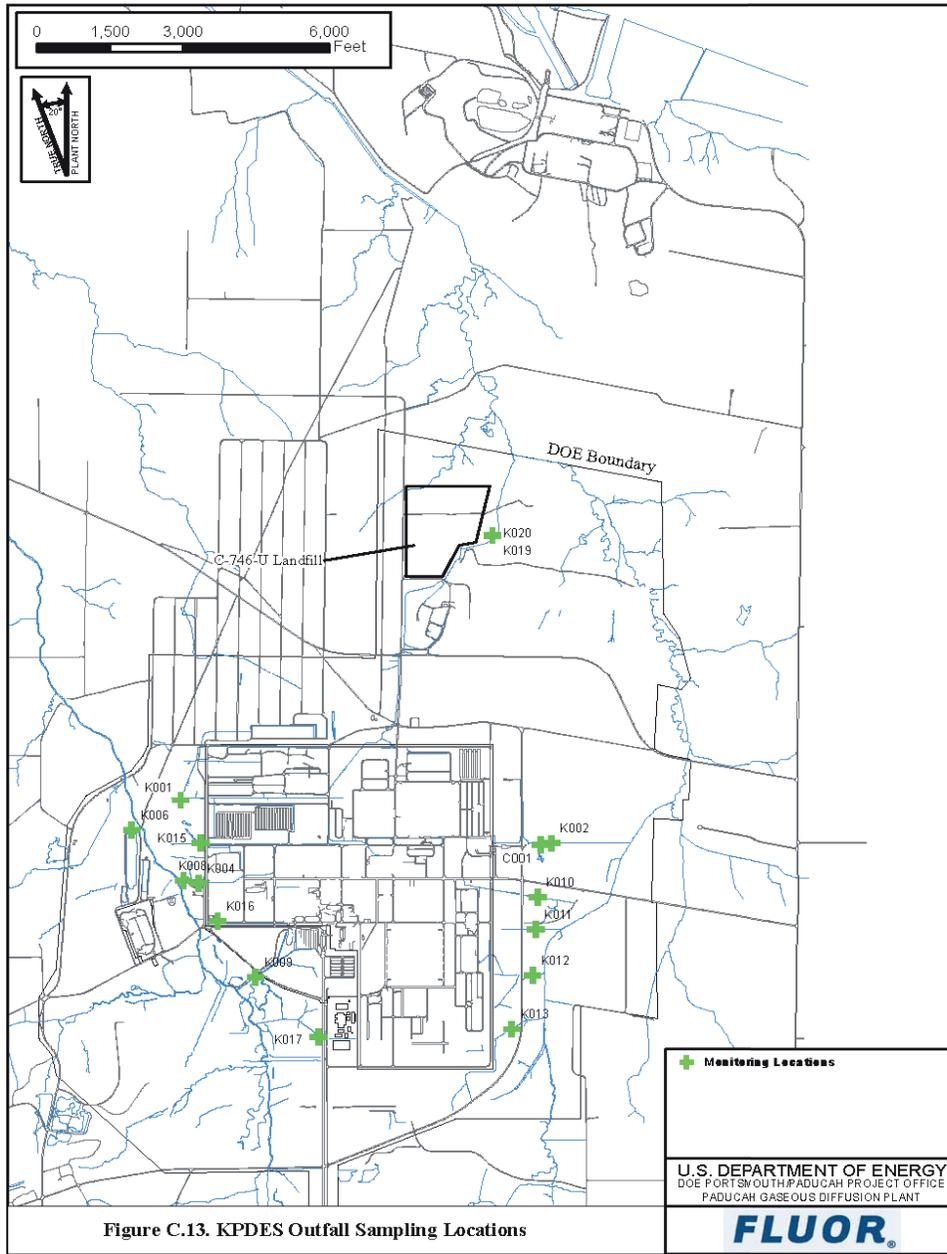
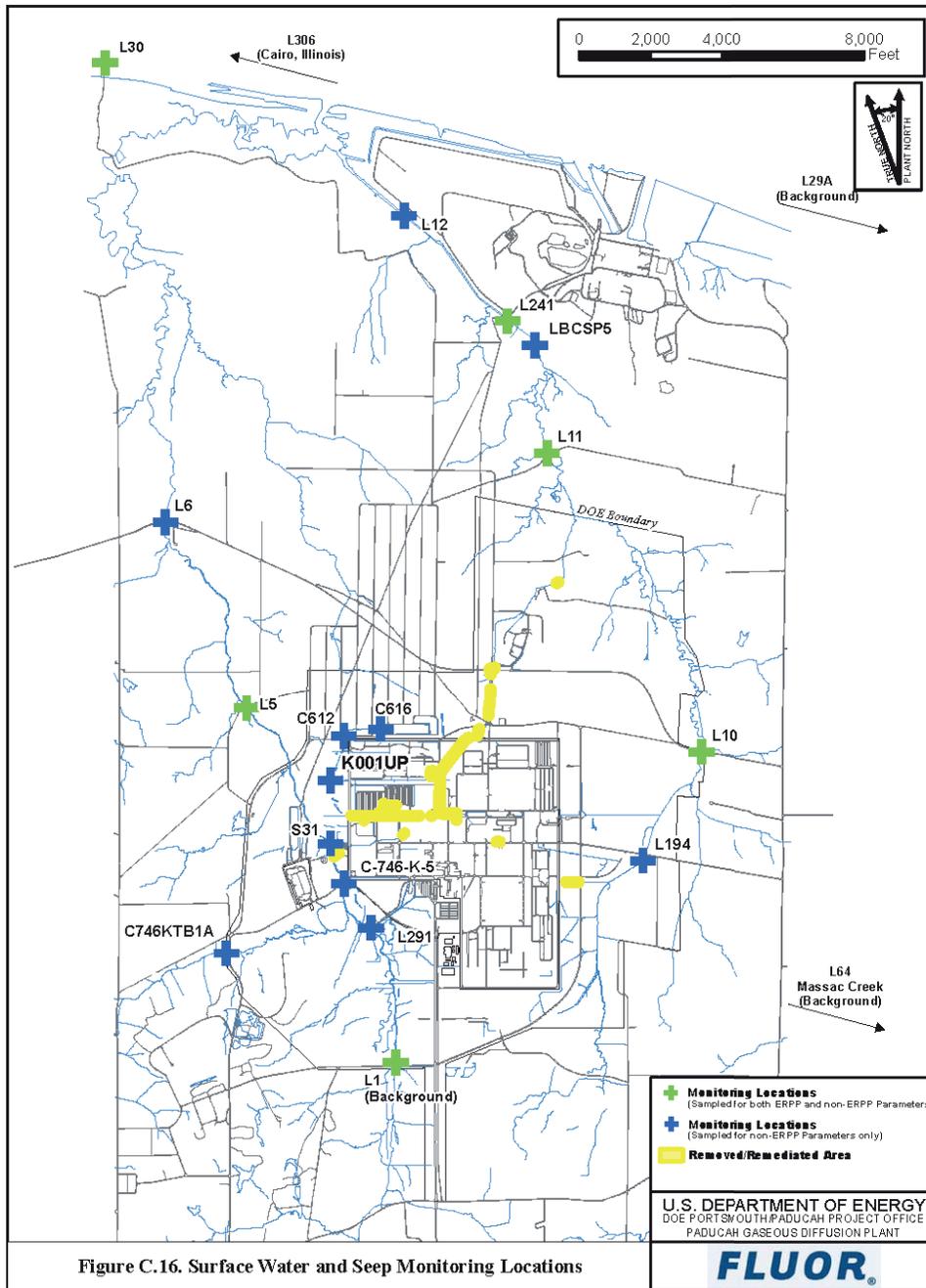


Figure C.13. KPDES Outfall Sampling Locations

C-51

### Figure 2 Mowing Zone Map

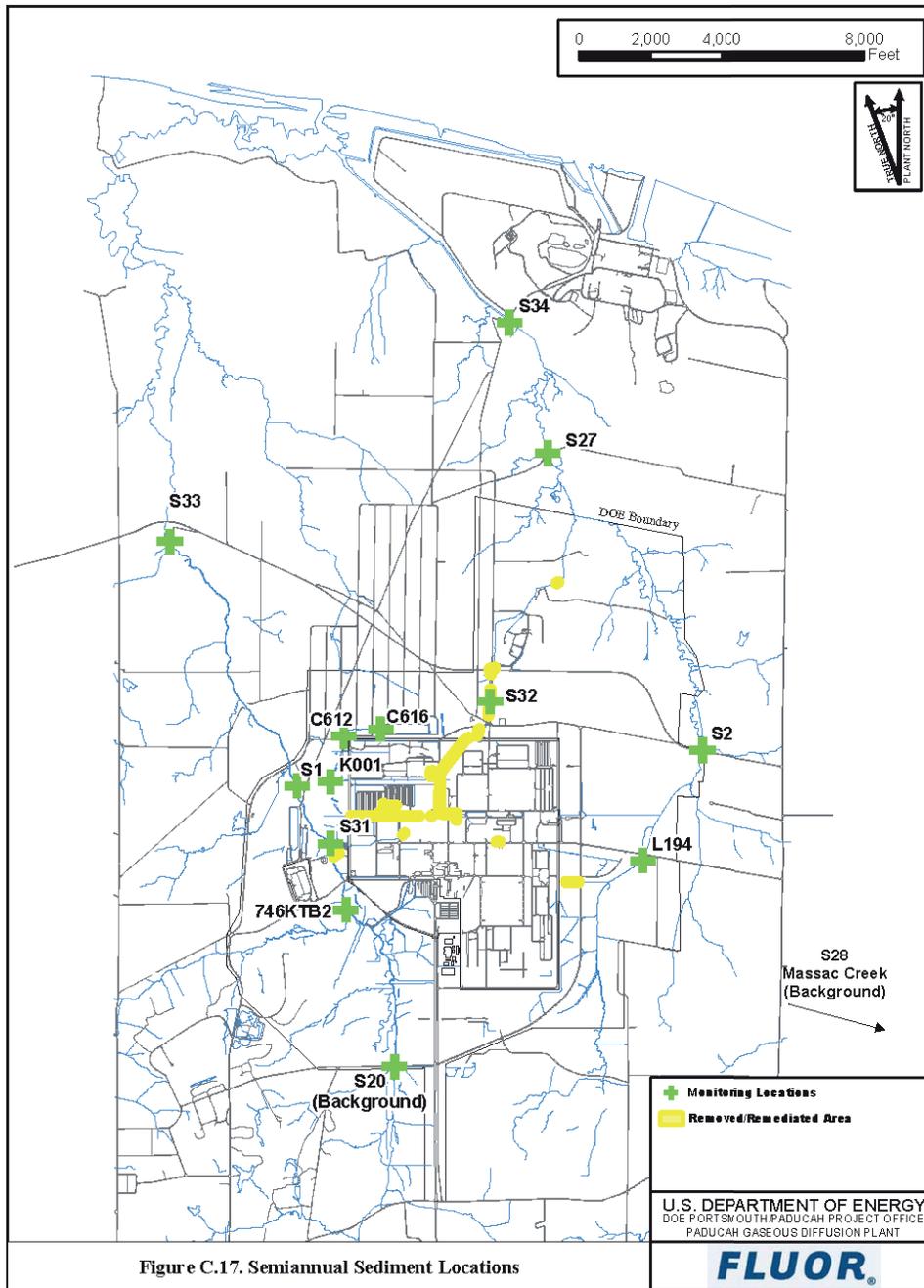
CP2-ES-0006/R1



C-61

Figure 3 Mowing Zone Map

CP2-ES-0006/R1



C-64

Figure 4 Mowing Zone Map

### 3.6 Scheduled Service for Air Monitors

SST will maintain a mowed, debris free, and pest controlled (e.g., chiggers) pathway to National Emission Standards for Hazardous Air Pollutants (NESHAP) air monitors that is no less than three feet wide and with a vegetation height not to exceed four inches. Accesses to these air monitors are necessary to maintain regulatory compliance with monitoring requirements in regulatory agreements and the PGDP environmental monitoring program. There are nine monitors as follows:

- NESHAP Air Monitoring Station Background
- NESHAP Air Monitoring Station at Outfall 002
- NESHAP Air Monitoring Station at Outfall 012
- NESHAP Air Monitoring Station at Outfall 015
- NESHAP Air Monitoring Station near C-612
- NESHAP Air Monitoring Station near Post 57
- NESHAP Air Monitoring Station at Landfill
- NESHAP Air Monitoring Station at Northeast (NE) Plume Well
- NESHAP Air Monitoring Station east of C-746-U Landfill in use at PGDP

**Scheduled Service for Sampling Wells.** SST will provide an access route and mow a 10-foot radius circle with a vegetation height not to exceed four inches around the groundwater wells based on the Deactivation and Remediation (D&R) Contractor's sampling schedules. The D&R Contractor provides sampling schedules on a month-ahead basis to determine what mowing is necessary to ensure safe access is maintained. The use of herbicide is prohibited for this activity.

### 3.7 Groundwater Monitoring Wells

The PGDP has 356 groundwater monitoring wells that are sampled on a routine basis by the D&R Contractor. The number of monitoring wells monitored may fluctuate  $\pm 10\%$  per year. Mowing around wells is performed one, two, or three times per year and is scheduled based on the sampling schedule included in the PGDP Environmental Monitoring Plan.

The Location Map provides the location of the monitoring wells to be serviced and Contract DE-EM0003733, Attachment J-8.C.3.5.5c, Sampling Well Frequency Schedule, provides the wells sampling schedule. SST will coordinate with the D&R Contractor on mowing around applicable wells. SST will coordinate with other Site Contractors to access these areas based on Contract DE-EM0003733 Attachment J-5, Government Furnished Service and Interface Requirements Matrix.

### 3.8 Shrubs, Hedges, and Trees

To maintain their existing growth characteristics/shape, shrubs and hedges in the Zone I Area(s) will be pruned annually between May 15 and October 15. Shrubs and hedges will be fertilized with a 23-10-5 fertilizer mixture two times each year (once in the spring, prior to June 1; and once in the fall, prior to October 15). The shapes of hedges will not be changed without prior approval of DOE unless changes are required to address an

immediate safety concern. SST will care for younger trees, (e.g. young trees south of building C-100) to include feeding no less than once per year and ensuring that the mowing and trimming around the trees does not damage the bark.

### **3.9 Railroad Vegetation Control**

SST will eliminate or control vegetation from areas within, and adjacent to, track age where not required for erosion control. SST will prevent vegetation from becoming a fire hazard, obstructing visibility of signs and signals, interfering with employees performing normal trackside duties, or preventing proper functioning of signals and communication lines. SST will provide vegetation control services as scheduled maintenance.

SST will maintain ballast areas free of vegetation 16 feet wide, eight feet each side of center line. Any herbicides used will be registered with the U.S. Environmental Protection Agency and approved by DOE. Use will be in strict compliance with label directions for control of vegetation. Non-selective soil residual herbicides will not be used under the drip line of trees or shrubs, nor within 10 feet of annual flowers or gardens. A contact herbicide may be used within such areas. Herbicides will not be administered within 15 feet of the high water mark of plant ditches and outfalls. Manufacturer recommendations are followed exactly for all applications of herbicides and pesticides. Special care will be taken so that vegetation in privately owned areas adjacent to treated areas is not damaged. SST will be responsible for any damage caused by herbicide treatments made by SST personnel.

### **3.10 Outfall Access Points, View Points, and Ditches Vegetation Control, Surface Water, and Sediment Sampling Locations**

SST will control the height of vegetation in and along outfall ditches on a biannual basis to prevent woody growth. Herbicides will not be administered within 15 feet of the high water mark of plant ditches and outfalls. Manufacturer recommendations are followed exactly for all applications of herbicides and pesticides.

SST will maintain a mowed and debris-free pathway to Outfall Access Points, including steps and platforms leading to sampling wells, that is no less than three feet wide and with a vegetation height not to exceed 12 inches. The use of herbicide in these areas must be approved by DOE. SST shall coordinate with the D&R Contractor on mowing (or clearing and weed removal) a pathway to sediment and surface water monitoring locations on DOE property (or Tennessee Valley Authority and West Kentucky Wildlife Management Area property where access agreements are in place) around applicable wells. Surface water sampling is conducted quarterly and sediment sampling is conducted semi-annually. Maps of these locations are figures C.13, C.16 and C.17 of the current Environmental Monitoring Plan for the PGDP.

SST will trim the vegetation/grass along outfall viewing points, such as pipe dams, to provide ample viewing of pipe inflow and outflow, and maintain vegetation/grass at a height of 18 inches or less.

SST will maintain the Surface Water and Sediment sampling locations based on the D&R Contractor sampling schedules. The D&R Contractor provides sampling schedules

on a month-ahead basis to determine what mowing is necessary to ensure safe access is maintained.

### **3.11 Yards, Lots, and Gravel Areas Vegetation Control**

SST will utilize herbicide or other means, as approved by the DOE, to control weed growth and other vegetation in areas not addressed by other zones, such as switchyards, cylinder yards, dust palliative areas, gravel lots, staging areas, and other similar areas. SST shall control the vegetation in these areas at a height of 18" inches or less.

## **4.0 MOWING SCHEDULE**

### **4.1 Factors for Schedule Development**

SST will implement and adhere to a mowing schedule based upon the performance work statement in DE-EM0003733. This schedule will be built based on past SST mowing efficiencies, Lessons Learned and worker feedback. This schedule is based on a flexible format that is subject to change due to impacts from inclement weather. Any schedule changes due to unforeseen circumstances will be communicated to the customer through the Operations and Maintenance (O&M) Manager or the Director of Integrated Services. Only the O&M Manager or the Director of Integrated Services will have the authority to authorize any implementation of schedule changes (see Attachment A, Mowing Schedule for Fiscal Year 2020).

### **4.2 Resource Management**

SST will utilize United Steel Workers (USW) personnel to perform all grounds maintenance activities. USW Laborers and Heavy Equipment Operators will be utilized to perform the following activities:

- Operation of tractor and mowing attachments;
- Operation of commercial mowing equipment;
- Operation of equipment mounted cutting attachments; and
- Weed eating and edger activities.

Only personnel licensed as USDA pesticide applicators/operators will apply herbicide at the PGDP Site. SST will utilize USW employees (Laborers and Heavy Equipment Operators) to perform all mowing and grounds maintenance activities. If inclement weather conditions (i.e., above average rainfall, less than average rainfall) should impact scheduled mowing activities, SST will utilize any means available to minimize the schedule impact. SST will incorporate reassignment of other USW workers to enhance the assigned grounds maintenance crew population. SST will also incorporate additional overtime and/or shifts, as necessary, to keep schedule impacts to a minimum.

### **4.3 Work Control**

General work packages will be developed for all Level I grounds maintenance activities. Level II Grounds Maintenance (pruning in additional mowing zones, special events, etc.) activities will be addressed through the implementation of Level II Service Orders.

## **5.0 POST-MOWING ACTIVITIES**

### **5.1 Cleaning, Evaluations, and Repair of Equipment**

SST will perform pre- and post-operational checks on all grounds maintenance equipment assigned for use on a daily basis, in accordance with SST procedures. PM will be based on number of hours/miles on each piece of equipment, as recommended by the OEM. All PM, repairs, and corrective maintenance activities will be performed and documented in the CMMS.

### **5.2 Self-Assessment for Compliance with Quality Assurance Surveillance Plan**

O&M personnel in conjunction with Quality Assurance personnel will perform walk-downs to ensure work is completed in compliance with the QASP performance standards and acceptable quality levels.

## **6.0 CONCLUSION**

SST will implement and utilize the information contained in the SST Mowing Plan to ensure that all grounds maintenance activities will be performed in accordance with the performance work statements in DE-EM0003733.

## **7.0 ATTACHMENTS**

Attachment A, *Revised Mowing Schedule for Fiscal Year 2020*.

## ATTACHMENT A – REVISED MOWING SCHEDULE FOR FISCAL YEAR 2020

Mowing Zones Listing and Mowing Frequencies					
Location	Frequency	Tentative start dates week of: Special Comments			
			3/23/2020	3/30/2020	4/6/2020
<b>Zone I</b>	6" or less		X	X	X
<b>Zone II</b>	12" or less	Non-Rad areas	X		X
	36" or less	Rad areas	X		X
<b>Zone III</b>	18" or less	18" or less (Non-Rad areas)		X	
	36" or less	36" or less (Rad areas)		X	
<b>Zone IV (SWMU)</b>	NLT 30 Calendar Days	18" or less		X	
<b>Zone V</b>	Bi-Annual				
<b>Zone VI</b>	Bi-Annual				
<b>VII (Fencing)</b>					
VII.a		12" or less; 50' from fenceline		X	
VII.b		12" or less; 20' from fenceline		X	
<b>Sampling Wells</b>	based on sampling schedule provided	4" or less; 10' radius	X	X	X
<b>Shrubs, Trees and Hedges</b>					
A) Pruning	Annual	Between May and October			
B) Fertilizing	Bi-Annual	Prior to June 1 & Oct. 15			
<b>Outfall Access Points, View Points and Ditches</b>					
Outfall Ditches	Bi-Annual	Prevent woody growth			
Pathways to Outfall Access Points		NLT 36" wide for pathways; 12" or less height for vegetation		X	
Outfall Viewing Points		18" or less		X	
Surface Water	Quarterly	18" or less	X	X	X
Sediment Sampling	Bi-Annually	18" or less		X	

Mowing Zones Listing and Mowing Frequencies					
Location	Frequency	Tentative start dates week of: Special Comments			
			4/13/2020	4/20/2020	4/27/2020
<b>Zone I</b>	6" or less		X	X	X
<b>Zone II</b>	12" or less	Non-Rad areas		X	
	36" or less	Rad areas		X	
<b>Zone III</b>	18" or less	18" or less (Non-Rad areas)			
	36" or less	36" or less (Rad areas)			
<b>Zone IV (SWMU)</b>	NLT 30 Calendar Days	18" or less			
<b>Zone V</b>	Bi-Annual			X	
<b>Zone VI</b>	Bi-Annual				
<b>VII (Fencing)</b>					
VII.a		12" or less; 50' from fenceline	X		X
VII.b		12" or less; 20' from fenceline	X		X
<b>Sampling Wells</b>	based on sampling schedule provided	4" or less; 10' radius	X	X	X
<b>Shrubs, Trees and Hedges</b>					
A) Pruning	Annual	Between May and October			
B) Fertilizing	Bi-Annual	Prior to June 1 & Oct. 15			
<b>Outfall Access Points, View Points and Ditches</b>					
Outfall Ditches	Bi-Annual	Prevent woody growth		X	
Pathways to Outfall Access Points		NLT 36" wide for pathways; 12" or less height for vegetation			
Outfall Viewing Points		18" or less			
Surface Water	Quarterly	18" or less	X	X	X
Sediment Sampling	Bi-Annually	18" or less			

## ATTACHMENT A – REVISED MOWING SCHEDULE FOR FISCAL YEAR 2020 (CONT.)

Mowing Zones Listing and Mowing Frequencies					
Location	Frequency	Special Comments	Tenative start dates week of:		
			5/4/2020	5/11/2020	5/18/2020
<b>Zone I</b>	6" or less		X	X	X
<b>Zone II</b>	12" or less	Non-Rad areas	X		X
	36" or less	Rad areas	X		X
<b>Zone III</b>	18" or less	18" or less (Non-Rad areas)	X		
	36" or less	36" or less (Rad areas)	X		
<b>Zone IV (SWMU)</b>	NLT 30 Calendar Days	18" or less	X		
<b>Zone V</b>	Bi-Annual				
<b>Zone VI</b>	Bi-Annual				
<b>VII (Fencing)</b>					
VII.a		12" or less; 50' from fenceline		X	
VII.b		12" or less; 20' from fenceline		X	
<b>Sampling Wells</b>	based on sampling schedule provided	4" or less; 10' radius	X	X	X
<b>Shrubs, Trees and Hedges</b>					
A) Pruning	Annual	Between May and October			
B) Fertilizing	Bi-Annual	Prior to June 1 & Oct. 15			X
<b>Outfall Access Points, View Points and Ditches</b>					
Outfall Ditches	Bi-Annual	Prevent woody growth			
Pathways to Outfall Access Points		NLT 36" wide for pathways; 12" or less height for vegetation	X		
Outfall Viewing Points		18" or less	X		
Surface Water	Quarterly	18" or less			
Sediment Sampling	Bi-Annually	18" or less			

Mowing Zones Listing and Mowing Frequencies					
Location	Frequency	Special Comments	Tenative start dates week of:		
			5/25/2020	6/1/2020	6/8/2020
<b>Zone I</b>	6" or less		X	X	X
<b>Zone II</b>	12" or less	Non-Rad areas		X	
	36" or less	Rad areas		X	
<b>Zone III</b>	18" or less	18" or less (Non-Rad areas)			X
	36" or less	36" or less (Rad areas)			X
<b>Zone IV (SWMU)</b>	NLT 30 Calendar Days	18" or less			X
<b>Zone V</b>	Bi-Annual				
<b>Zone VI</b>	Bi-Annual			X	
<b>VII (Fencing)</b>					
VII.a		12" or less; 50' from fenceline	X		X
VII.b		12" or less; 20' from fenceline	X		X
<b>Sampling Wells</b>	based on sampling schedule provided	4" or less; 10' radius	X	X	X
<b>Shrubs, Trees and Hedges</b>					
A) Pruning	Annual	Between May and October			
B) Fertilizing	Bi-Annual	Prior to June 1 & Oct. 15			
<b>Outfall Access Points, View Points and Ditches</b>					
Outfall Ditches	Bi-Annual	Prevent woody growth			
Pathways to Outfall Access Points		NLT 36" wide for pathways; 12" or less height for vegetation			X
Outfall Viewing Points		18" or less			X
Surface Water	Quarterly	18" or less			
Sediment Sampling	Bi-Annually	18" or less	X		

## ATTACHMENT A – REVISED MOWING SCHEDULE FOR FISCAL YEAR 2020 (CONT.)

Mowing Zones Listing and Mowing Frequencies					
Location	Frequency	Special Comments	Tentative start dates week of:		
			6/15/2020	6/22/2020	6/29/2020
<b>Zone I</b>	6" or less		X	X	X
<b>Zone II</b>	12" or less	Non-Rad areas	X		X
	36" or less	Rad areas	X		X
<b>Zone III</b>	18" or less	18" or less (Non-Rad areas)			
	36" or less	36" or less (Rad areas)			
<b>Zone IV (SWMU)</b>	NLT 30 Calendar Days	18" or less			
<b>Zone V</b>	Bi-Annual				
<b>Zone VI</b>	Bi-Annual				
<b>VII (Fencing)</b>					
VII.a		12" or less; 50' from fenceline		X	
VII.b		12" or less; 20' from fenceline		X	
<b>Sampling Wells</b>	based on sampling schedule provided	4" or less; 10' radius	X	X	X
<b>Shrubs, Trees and Hedges</b>					
A) Pruning	Annual	Between May and October			
B) Fertilizing	Bi-Annual	Prior to June 1 & Oct. 15			
<b>Outfall Access Points, View Points and Ditches</b>					
Outfall Ditches	Bi-Annual	Prevent woody growth			
Pathways to Outfall Access Points		NLT 36" wide for pathways; 12" or less height for vegetation			
Outfall Viewing Points		18" or less			
Surface Water	Quarterly	18" or less			X
Sediment Sampling	Bi-Annually	18" or less			

Mowing Zones Listing and Mowing Frequencies					
Location	Frequency	Special Comments	Tentative start dates week of:		
			7/6/2020	7/13/2020	7/20/2020
<b>Zone I</b>	6" or less		X	X	X
<b>Zone II</b>	12" or less	Non-Rad areas		X	
	36" or less	Rad areas		X	
<b>Zone III</b>	18" or less	18" or less (Non-Rad areas)		X	
	36" or less	36" or less (Rad areas)		X	
<b>Zone IV (SWMU)</b>	NLT 30 Calendar Days	18" or less		X	
<b>Zone V</b>	Bi-Annual				
<b>Zone VI</b>	Bi-Annual				
<b>VII (Fencing)</b>					
VII.a		12" or less; 50' from fenceline	X		X
VII.b		12" or less; 20' from fenceline	X		X
<b>Sampling Wells</b>	based on sampling schedule provided	4" or less; 10' radius	X	X	X
<b>Shrubs, Trees and Hedges</b>					
A) Pruning	Annual	Between May and October			
B) Fertilizing	Bi-Annual	Prior to June 1 & Oct. 15			
<b>Outfall Access Points, View Points and Ditches</b>					
Outfall Ditches	Bi-Annual	Prevent woody growth			
Pathways to Outfall Access Points		NLT 36" wide for pathways; 12" or less height for vegetation		X	
Outfall Viewing Points		18" or less	X		
Surface Water	Quarterly	18" or less	X	X	X
Sediment Sampling	Bi-Annually	18" or less			

## ATTACHMENT A – REVISED MOWING SCHEDULE FOR FISCAL YEAR 2020 (CONT.)

Mowing Zones Listing and Mowing Frequencies					
Location	Frequency	Tentative start dates week of: Special Comments			
			7/27/2020	8/3/2020	8/10/2020
<b>Zone I</b>	6" or less		X	X	X
<b>Zone II</b>	12" or less	Non-Rad areas	X		X
	36" or less	Rad areas	X		X
<b>Zone III</b>	18" or less	18" or less (Non-Rad areas)			
	36" or less	36" or less (Rad areas)			
<b>Zone IV (SWMU)</b>	NLT 30 Calendar Days	18" or less			
<b>Zone V</b>	Bi-Annual				
<b>Zone VI</b>	Bi-Annual				
<b>VII (Fencing)</b>					
VII.a		12" or less; 50' from fenceline		X	
VII.b		12" or less; 20' from fenceline		X	
<b>Sampling Wells</b>	based on sampling schedule provided	4" or less; 10' radius	X	X	X
<b>Shrubs, Trees and Hedges</b>					
A) Pruning	Annual	Between May and October			
B) Fertilizing	Bi-Annual	Prior to June 1 & Oct. 15			
<b>Outfall Access Points, View Points and Ditches</b>					
Outfall Ditches	Bi-Annual	Prevent woody growth			
Pathways to Outfall Access Points		NLT 36" wide for pathways; 12" or less height for vegetation			
Outfall Viewing Points		18" or less			X
Surface Water	Quarterly	18" or less	X		
Sediment Sampling	Bi-Annually	18" or less			

Mowing Zones Listing and Mowing Frequencies					
Location	Frequency	Tentative start dates week of: Special Comments			
			8/17/2020	8/24/2020	8/31/2020
<b>Zone I</b>	6" or less		X	X	X
<b>Zone II</b>	12" or less	Non-Rad areas		X	
	36" or less	Rad areas		X	
<b>Zone III</b>	18" or less	18" or less (Non-Rad areas)	X		
	36" or less	36" or less (Rad areas)	X		
<b>Zone IV (SWMU)</b>	NLT 30 Calendar Days	18" or less	X		
<b>Zone V</b>	Bi-Annual			X	
<b>Zone VI</b>	Bi-Annual				
<b>VII (Fencing)</b>					
VII.a		12" or less; 50' from fenceline	X		X
VII.b		12" or less; 20' from fenceline	X		X
<b>Sampling Wells</b>	based on sampling schedule provided	4" or less; 10' radius	X	X	X
<b>Shrubs, Trees and Hedges</b>					
A) Pruning	Annual	Between May and October		X	
B) Fertilizing	Bi-Annual	Prior to June 1 & Oct. 15			
<b>Outfall Access Points, View Points and Ditches</b>					
Outfall Ditches	Bi-Annual	Prevent woody growth			
Pathways to Outfall Access Points		NLT 36" wide for pathways; 12" or less height for vegetation	X		
Outfall Viewing Points		18" or less			
Surface Water	Quarterly	18" or less			
Sediment Sampling	Bi-Annually	18" or less			

## ATTACHMENT A – REVISED MOWING SCHEDULE FOR FISCAL YEAR 2020 (CONT.)

Mowing Zones Listing and Mowing Frequencies					
Location	Frequency	Special Comments	Tenative start dates week of:		
			9/7/2020	9/14/2020	9/21/2020
<b>Zone I</b>	6" or less		X	X	X
<b>Zone II</b>	12" or less	Non-Rad areas	X		X
	36" or less	Rad areas	X		X
<b>Zone III</b>	18" or less	18" or less (Non-Rad areas)			X
	36" or less	36" or less (Rad areas)			X
<b>Zone IV (SWMU)</b>	NLT 30 Calendar Days	18" or less			X
<b>Zone V</b>	Bi-Annual				
<b>Zone VI</b>	Bi-Annual				X
<b>VII (Fencing)</b>					
VII.a		12" or less; 50' from fenceline		X	
VII.b		12" or less; 20' from fenceline		X	
<b>Sampling Wells</b>	based on sampling schedule provided	4" or less; 10' radius	X	X	X
<b>Shrubs, Trees and Hedges</b>					
A) Pruning	Annual	Between May and October			
B) Fertilizing	Bi-Annual	Prior to June 1 & Oct. 15			
<b>Outfall Access Points, View Points and Ditches</b>					
Outfall Ditches	Bi-Annual	Prevent woody growth			X
Pathways to Outfall Access Points		NLT 36" wide for pathways; 12" or less height for vegetation			X
Outfall Viewing Points		18" or less		X	
Surface Water	Quarterly	18" or less			
Sediment Sampling	Bi-Annually	18" or less			

Mowing Zones Listing and Mowing Frequencies					
Location	Frequency	Special Comments	Tenative start dates week of:		
			9/28/2020	10/5/2020	10/12/2020
<b>Zone I</b>	6" or less		X	X	X
<b>Zone II</b>	12" or less	Non-Rad areas		X	
	36" or less	Rad areas		X	
<b>Zone III</b>	18" or less	18" or less (Non-Rad areas)			
	36" or less	36" or less (Rad areas)			
<b>Zone IV (SWMU)</b>	NLT 30 Calendar Days	18" or less			
<b>Zone V</b>	Bi-Annual				
<b>Zone VI</b>	Bi-Annual				
<b>VII (Fencing)</b>					
VII.a		12" or less; 50' from fenceline	X		X
VII.b		12" or less; 20' from fenceline	X		X
<b>Sampling Wells</b>	based on sampling schedule provided	4" or less; 10' radius	X	X	X
<b>Shrubs, Trees and Hedges</b>					
A) Pruning	Annual	Between May and October			
B) Fertilizing	Bi-Annual	Prior to June 1 & Oct. 15	X		
<b>Outfall Access Points, View Points and Ditches</b>					
Outfall Ditches	Bi-Annual	Prevent woody growth			
Pathways to Outfall Access Points		NLT 36" wide for pathways; 12" or less height for vegetation			
Outfall Viewing Points		18" or less			X
Surface Water	Quarterly	18" or less	X	X	X
Sediment Sampling	Bi-Annually	18" or less			

## ATTACHMENT A – REVISED MOWING SCHEDULE FOR FISCAL YEAR 2020 (CONT.)

Mowing Zones Listing and Mowing Frequencies					
Location	Frequency	Tentative start dates week of: Special Comments			
			10/19/2020	10/26/2020	11/2/2020
<b>Zone I</b>	6" or less		X	X	X
<b>Zone II</b>	12" or less	Non-Rad areas	X		
	36" or less	Rad areas	X		
<b>Zone III</b>	18" or less	18" or less (Non-Rad areas)	X		
	36" or less	36" or less (Rad areas)	X		
<b>Zone IV (SWMU)</b>	NLT 30 Calendar Days	18" or less	X		
<b>Zone V</b>	Bi-Annual				
<b>Zone VI</b>	Bi-Annual				
<b>VII (Fencing)</b>					
VII.a		12" or less; 50' from fenceline		X	X
VII.b		12" or less; 20' from fenceline		X	X
<b>Sampling Wells</b>	based on sampling schedule provided	4" or less; 10' radius	X	X	X
<b>Shrubs, Trees and Hedges</b>					
A) Pruning	Annual	Between May and October			
B) Fertilizing	Bi-Annual	Prior to June 1 & Oct. 15			
<b>Outfall Access Points, View Points and Ditches</b>					
Outfall Ditches	Bi-Annual	Prevent woody growth			
Pathways to Outfall Access Points		NLT 36" wide for pathways; 12" or less height for vegetation	X		
Outfall Viewing Points		18" or less			
Surface Water	Quarterly	18" or less	X	X	X
Sediment Sampling	Bi-Annually	18" or less			