

Department of Conservation & Natural Resources

Brian Sandoval, Governor Leo M. Drozdoff, P.E., Director David Emme, Administrator

April 27, 2016

Harry Van Den Berg, P.E. AECOM 1220 Avenida Acaso Camarillo, CA 93012

Re:

Tronox LLC (TRX) Facility

Nevada Environmental Response Trust (Trust) Property

NDEP Facility ID #H-000539

Nevada Division of Environmental Protection (NDEP) Response to:

Amendment No. 1 to Work Plan (#2015-130) for General Site-Wide Work Plan – Nevada Environmental Response Trust Remedial Investigation, Downgradient Study Area,

Henderson, Nevada Dated: April 11, 2016

Dear Mr. Van Den Berg,

The NDEP has received and reviewed the above-referenced correspondence transmitted to NDEP on April 11, 2016 (enclosed). The NDEP has consulted with the US EPA as required by the Environmental Response Trust Settlement Agreement and the US EPA has no questions of the amendment. The NDEP has consulted with the NERT as required by the Environmental Response Trust Settlement Agreement and the NERT have no questions of the amendment.

NDEP hereby approves the above-referenced amendment and the Task Order budgets will be revised to reflect this approval. The new Task Order budget for #2015-130 will be increased by \$25,651 which means the Task Order budget increases from originally approved \$95,183 to newly approved \$120,834.

Please contact the undersigned with any questions at <u>jearltonparker@ndep.nv.gov</u> or 702-486-2850 Ext 228.

Carlton Parker, P.G.

Bureau of Industrial Site Cleanup

NDEP-Las Vegas City Office

JCP:jcp

JCP:jcp

EC (with enclosure):

James Dotchin, NDEP BISC Las Vegas

Weiquan Dong, NDEP BISC Las Vegas

Adam Baas, Edgcomb Law Group

Allan Delorme, Ramboll Environ

Alison Fong, U.S. Environmental Protection Agency, Region 9

Andrew Barnes, Geosyntec

Andrew Steinberg, Nevada Environmental Response Trust

Anna Springsteen, Neptune & Company Inc.

Betty Kuo Brinton, MWDH2O

Brenda Pohlmann, City of Henderson

Brian Waggle, Hargis + Associates

Carol Nagai, MWDH2O

Charles K. Hauser, Esq., Southern Nevada Water Authority

Chris Ritchie, Ramboll Environ

Chuck Elmendorf, Stauffer Management Company, LLC

Dave Share, Olin

David Johnson, Central Arizona Water Conservation District

Dave Johnson, LVVWD

Derek Amidon, Tetratech

Ebrahim Juma, Clean Water Team

Ed Modiano, de maximis, inc.

Eric Fordham, Geopentech

Frank Johns, Tetratech

Gary Carter, Endeavour

George Crouse, Syngenta Crop Protection, Inc.

Jasmine Mehta, AG Office

Jay Steinberg, Nevada Environmental Response Trust

Jeff Gibson, Endeavour

Jill Teraoka, MWDH2O

Joanne Otani

Joe Kelly, Montrose Chemical Corporation of CA

Joe Leedy, Clean Water Team

John Pekala, Ramboll Environ

Katherine Baylor, U.S. Environmental Protection Agency, Region 9

Kelly McIntosh, GEI Consultants

Kevin Fisher, LV Valley Water District

Kirk Stowers, Broadbent & Associates

Kirsten Lockhart, Neptune & Company Inc.

Kim Kuwabara, Ramboll Environ

Kurt Fehling, The Fehling Group

Kyle Gadley, Geosyntec

Kyle. Hansen, Tetratech

Lee Farris, BRC

Marcia Scully, Metropolitan Water District of Southern California

Maria Lopez, Water District of Southern California

Mark Paris, Landwell

Michael J. Bogle, Womble Carlyle Sandridge & Rice, LLP

Michael Long, Hargis + Associates

Mickey Chaudhuri, Metropolitan Water District of Southern California

Nicholas Pogoncheff, PES Environmental, Inc.

Paul Black, Neptune and Company, Inc.

Paul Hackenberry, Hackenberry Associates, LLC

Patti Meeks, Neptune & Company Inc.
Peggy Roefer, CRC
Ranajit Sahu, BRC
Richard Pfarrer, TIMET
Rick Kellogg, BRC
Scott Bryan, Central Arizona Project
Steve Clough, Nevada Environmental Response Trust
Tanya O'Neill, Foley & Lardner L
Todd Tietjen, SNWA

805.388.3775 805.388.3577

fax

tel

April 11, 2016

Mr. James D. Dotchin Chief, Bureau of Industrial Site Cleanup Nevada Division of Environmental Protection 2030 East Flamingo Road, Suite 230 Las Vegas, Nevada 89119

Subject:

Amendment No. 1 to Work Plan (#2015-130) for General Site-Wide Work Plan-Nevada Environmental Response Trust Remedial Investigation, Downgradient Study Area, Henderson, Nevada

Dear Mr. Dotchin:

AECOM is pleased to provide this amendment to the Work Plan for preparing General Site-Wide Work Plan in support of the Downgradient Study Area component of the Nevada Environmental Response Trust (NERT) Remedial Investigation in Henderson, Nevada. The original Work Plan. dated December 30, 2015, was approved by Nevada Division of Environmental Protection (NDEP) on January 8, 2016. This amendment includes revised labor hours for AECOM to account for additional level of effort associated with the execution of the scope of work as discussed below.

SCOPE OF WORK AMENDMENT

The scope of work described in the December 30, 2015, Work Plan remains unchanged with the following exceptions:

- 1. Health and Safety Plan: Preparation of the Health and Safety Plan (HASP) was more labor intensive than planned due to the need to incorporate boats and associated watercraft safety for the collection of surface water samples in Las Vegas Wash. It was assumed that surface water samples would be collected from the stream banks or by using waders for mid-stream samples. Due to the current stream flows and the weir configuration, it was determined that a boat would be needed for portions of the surface water sampling. This was a significant change to the level of effort required to complete the HASP.
- 2. Quality Assurance Project Plan: Preparation of the Quality Assurance Project Plan (QAPP) was more labor intensive than planned due to the addition of hexavalent chromium into the sampling suite and the addition of filtering for metals samples. In addition several conference calls and QAPP revisions were needed to address data nomenclature, electronic data deliverables (EDDs) and other details that were not included in the original estimate. Incorporating the NERT sampling nomenclature had to be justified to the stakeholders, specifically regarding blanks and duplicates. AECOM original budget was based on the assumption that the EDD format was already established with TestAmerica.
- 3. Field Sampling and Analysis Plan and Standard Operating Procedures: Preparation of the Standard Operating Procedures (SOPs) is more labor intensive than planned due to the use of boats to collect surface water samples and the planned geophysical activities. Our original budget assumed that the NERT FSAP and SOPs would cover most field activities; however, we have introduced new field activities. In addition, research, interpretation and reduction of historical data has been more labor intensive than planned.

- 4. Access Negotiations: Obtaining site access was more labor intensive and required more senior staff involvement than planned due to legal reviews. Several discussions were required with the various property/well owners to arrive at mutually agreeable access terms. In addition, time was required to fill out permit applications and to obtain insurance certificates. Since access had already been obtained for previous sampling efforts, o ur original budget assumed that the process would be relatively straightforward.
- 5. **Baseline Schedule**: The baseline schedule for completion of the overall project required revisions to incorporate an additional review cycle for the stakeholders.

AECOM Labor

AECOM labor was revised to account for additional efforts as described above.

PRELIMINARY SCHEDULE AND ESTIMATED COST

The following summarizes the revised preliminary implementation schedule, the cost estimate from the December 2015 Work Plan, Amendment No. 1 cost estimate and the total revised cost estimate.

Task Order and Title	Approximate Schedule	Initial Est. Cost (Dec 2015)	Amendment No. 1 (R1)	Total Revised Est. Cost (March 2016)		
2015-130-01 – Site Wide Work Plan & Schedule (AECOM)	December 2015 - June 2017	\$95,183	\$25,651	\$120,834		
	Work Plan Total	\$95,183	\$25,651	\$120,834		

The total request for Addendum No. 1 is \$25,651. A detailed breakdown of the Addendum No. 1 budget is included in **Table 1**. Total cost for this Task Order, including budget requested in this amendment, is provided on **Table 2**. If this amendment meets with your approval, please send AECOM your authorization at your earliest convenience.

If you have any questions regarding this amendment, or if AECOM may be of further assistance, please contact Carmen Caceres-Schnell at (805) 764-4031 or either of the undersigned.

Sincerely,

Sally Bilodeau, CEM

Sally W. Bilodean

Project Manager

Harry Van Den Berg, PE Principal-in-Charge

Attachments: Table 1 Addendum 1 to General Site-Wide Work Plan Cost Breakdown
Table 2 General Site-Wide Work Plan Total Revised Cost Estimate

Table 1. Addendum 1 to General Site-Wide Work Plan Cost Breakdown Task Order 2015-130-01-R1 NERT Remedial Investigation - Downgradient Study Area

LABOR			Task Order Management		General Site-Wide Work Plan & Schedule		HASP		QAPP		FSAP & SOPs		Access & EAs				
Staff	Position	Units	Labor	Task 20	15-130A-01		015-130B-01		2015-130B-01		2015-130C-01	Task	2015-130D-01		015-130E-01	GRAN	D TOTAL
Harry Van Den Berg	Job Title Program Director/Principal	h	\$ 203.75	Hours	Total	Hours	Total	Hours	Total	Hours	Total	Hours	Total	Hours	Total	Hours	Total
Mike Flack	Program Director/Principal	h	\$ 203.75	0	3 -	0	\$ -	0	\$ -	6	\$ 1,222.50	10	\$ 2,037.50	10	\$ 2,037.50	26	\$ 5,297.
TBD Legal	Program Director/Principal	h	\$ 203.75	0	\$ -	1 0		0	\$ -	0	\$ -	0	\$ -	0	\$ -	0	\$ -
Shinsuke Kaneko	Senior Project Manager	h	\$ 174.51	0	\$ -	10	\$ 1,745.10	0	\$ -	0	<u>s</u> -	0	\$ -	0	\$ -	0	\$ -
Sally Bilodeau	Project Manager	h	\$ 157.13	0	\$ -	10	\$ 1,745.10	5	\$ 785.65	0	\$ -	0	\$ -	0	\$ -	10	\$ 1,745.
Joe Harrigan	Senior Scientist	h	\$ 156.66	0	\$ -	1 0		0	\$ /85.65	5	\$ 785.65	10	\$ 1,571.30	0	\$ -	20	\$ 3,142.
Kristen Durocher	Senior Scientist	h	\$ 156.66	0	\$ -	0	s -	20	\$ 3,133.20	0	\$ -	0	\$ -	0	\$ -	0	\$ -
Chad Roper	Senior Scientist	h	\$ 156.66	0	-	1 0	\$ -	0	\$ 3,133.20		\$ -	0	\$ -	0	\$ -	20	\$ 3,133.
Carmen Caceres-Schnell	Deputy Project Manager	h	\$ 125.41	0	s -	0	\$ -	0	3 -	30	\$ 4,699.75	0	\$ -	0	\$ -	30	\$ 4,699
Richard Rosenbaum	Project/Staff Scientist	h	\$ 124.73	0	\$ -	0	\$ -	0	\$ -	0	13 -	20	\$ 2,508.20	10	\$ 1,254.10	30	\$ 3,762
Ryan McCarthy	Project/Staff Scientist	h	\$ 124.73	0	\$ -	1 0	\$ -	0	\$ -	0		0	\$ -	0	\$ -	0	\$
Brian Ho	Project/Staff Scientist	h	\$ 124.73	0	\$ -	0	\$ -	0	\$ -	0	\$ -	0	5 -	0	\$ -	0	\$
Sara Arav-Piper	Project/Staff Scientist	h	\$ 124.73	0	\$ -	0	š -	0	\$ -	0			\$ -		3 -	0	\$
Joe Betzler	Project/Staff Scientist	h	\$ 124.73	0	\$	1 0	\$ -	0		0	\$ -	0	\$ -	12	\$ 1,496.76	12	\$ 1,496
Karsten Kelm	Project Drafting	h	\$ 95.24	0	\$ -	1 0	10	1 0	\$ -	0	\$ - \$ -	0	\$ -	15	\$ 1,870.95	15	\$ 1,870.
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