ENVIRON

September 28, 2012

Jeryl R. Gardner, PE
Bureau of Water Pollution Control
Nevada Division of Environmental Protection
901 South Stewart Street
Carson City, Nevada 89701

RE: Revision to June 2012 Discharge Monitoring Report (DMR) and Notice of Sampling Excursion for Week Ending July 7, 2012; NPDES Permit NV0023060; Nevada Environmental Response Trust Site, Henderson, Nevada.

Dear Mr. Gardner:

Pursuant to my telephone conversation on September 27 with Ms. Silvia Dahl of the Bureau of Water Pollution Control, I am writing on behalf of the Nevada Environmental Response Trust (NERT), to inform you of sampling results indicating excursions from permit limitations at NERT's groundwater extraction and treatment system located in Henderson, Nevada. The sampling results at issue are explained below.

1. Week Ending June 23 - As required by NERT's NPDES permit, 7-day composite samples of influent and effluent were collected and analyzed for various parameters, including perchlorate, by compositing individual daily grab samples. Initial laboratory results for the 7-day composite sample indicated an effluent perchlorate concentration of 310 ug/L, which is above the permit limit of 18 ug/L. Because the operator of the treatment system, Veolia Water North America (Veolia), reported no conditions at the system which would be indicative of an upset condition or perchlorate destruction having been compromised, Veolia initiated an investigation to determine the cause of the apparent anomalous result. Additional sampling and analyses were conducted on individual samples leading to an initial conclusion that the daily grab samples collected on June 19, had been mislabeled and that an influent sample (rather than an effluent sample) was used in creating the 7-day effluent composite. Based on these initial results, NERT filed a DMR with the Bureau of Water Pollution Control for the month of June (July 26, 2012) and noted in its cover letter that the sample from June 19 had been excluded from the 7-day composite result reported for the week ending June 23. Since the filing of the June 2012 DMR, Veolia has conducted an internal investigation to determine the cause of the apparent mislabeling of the sample. Based on additional sampling and analyses done pursuant to Veolia's investigation, the initial conclusion that the June 19 samples had been mislabeled now appears to be incorrect. Veolia now believes that the June 19 sample had most likely been cross-contaminated or otherwise compromised as a result of human sampling error (Veolia's internal investigation report is provided in Attachment A). Because there were no indications of process upset at any time during this period of operation, Veolia does not believe that perchlorate above permit limits was actually discharged to Las Vegas Wash. Nevertheless, NERT has now revised its June DMR to reflect the actual 7-day composite result collected for the week ending June 23. A copy of the revised DMR is provided in Attachment B.

ENVIRON International Corp. 2200 Powell Street, Suite 700, Emeryville, CA 94608
V +1 510.655.7400 F +1 510.655.9517

environcorp.com

2. Week Ending July 7 – Similar to the result obtained in June, the 7-day composite effluent sample for the week ending July 7 contained perchlorate at a concentration of 220 ug/L. Initially, Veolia suspected (as they had suspected for the June event) that one of the daily grab samples had been mislabeled and initiated an investigation that included additional analyses on the individual daily grab samples that were used to create the 7-day composite. The subsequent analyses failed to demonstrate any evidence of sample mislabeling and indicated that the July 3 effluent grab sample contained an elevated perchlorate concentration. None of the remaining daily effluent grab samples contained detectable levels of perchlorate. Veolia examined operating conditions on July 3 and (similar to June 19) found no evidence that the system was experiencing an upset condition or that perchlorate destruction had been compromised (see discussion in Attachment A). For this reason, Veolia believes that the July 3 sample had most likely been cross-contaminated or otherwise compromised as a result of human sampling error. The DMR for July (to be filed at the end of the third quarter 2012) will reflect the elevated perchlorate concentration of 220 ug/L detected in the 7-day composite for the week ending July 7.

As stated above and explained in Veolia's internal investigation report provided in Attachment A, the permit excursions reported herein are believed to be the result of the mishandling or other human error resulting in individual grab samples being compromised. In no instance during the period of operation has there been any evidence of process upset or of perchlorate destruction being compromised. Moreover, no subsequent effluent sampling results indicate that similar elevated concentrations of perchlorate have been present in effluent samples. Veolia has now instituted several internal sampling QA/QC procedures to mitigate the possibility of sample mishandling in the future and has also revised its process control protocols to provide additional safety factors to ensure perchlorate destruction is complete.

If you have any questions regarding the information provided in this letter, or wish to discuss on a call, please do not hesitate to contact me at (510) 420-2565.

Regards,

Allan DeLorme, PE
Managing Principal

Attachments

cc: Silvia Dahl, Compliance Coordinator, Bureau of Water Pollution Control, NDEP
Greg Lovato, Bureau of Corrective Actions, NDEP
Shannon Harbour, Bureau of Corrective Actions, NDEP
Regional Administrator, USEPA Region 9
Jay Steinberg, Nevada Environmental Response Trust
Andy Steinberg, Nevada Environmental Response Trust
Tanya O'Neil, Esq., Foley and Lardner
Shachin Chawla, Veolia Water North America
Steve Kubacki, Veolia Water North America
Mark Travers, ENVIRON International Corporation

Attachment A

Veolia Water Report Describing Elevated Effluent Results for Perchlorate Weeks of June 23 & July 7, 2012

September 13, 2012

Nevada Environmental Response Trust (NERT)
Report Describing Elevated Effluent Results for Perchlorate
Weeks of June 23 & July 7, 2012

Background

The Nevada Environmental Response Trust (NERT) maintains NPDES Permit NV0023060 (the "NPDES permit") for discharge of treated water, as part of their on-going effort to capture and treat groundwater containing perchlorate in the Henderson area. Per the NPDES permit, daily discrete samples of the influent and effluent are collected and composited weekly for perchlorate analysis. The effluent limit for perchlorate in the NPDES permit is 18 μg/L (30-day average).

Week of June 23, 2012 Effluent Composite Sample

For the week ending on June 23, grab samples of the influent and effluent were collected each day on June 17, 18, 19, 20, 21, 22, and 23. Seven-day composite samples of both the influent and effluent were prepared by Veolia Water (Veolia) on June 25 and sent to MWH (now Eurofins Eaton), a certified laboratory. MWH acknowledged receipt of the samples on June 26, and the samples were analyzed for perchlorate on July 18. In the laboratory report dated July 19, the effluent-composite result was 310 μg/L, which was higher than the typical non-detect (<4 μg/L). The influent-composite result was 92,000 μg/L, which was slightly lower than typical (approximately 100,000 μg/L).

On July 20, 2012, Veolia Water, Project Manager, Steve Kubacki, was notified via email from Susan Crowley (Consultant to NERT) of a possible effluent violation for perchlorate of the NPDES permit. At that time, the decision was made to re-composite the seven discrete effluent samples and send the re-composite sample to MWH to confirm the results. Therefore, on July 23, a re-composite sample of the seven effluent samples collected on June 17 through 23 was sent to MWH. MWH received the sample on July 24, analyzed the sample on July 25, and issued the analytical report on July 27. The effluent-composite result was 1,100 μg/L, significantly higher than the typical non-detect and significantly different than the original effluent-composite result of 310 μg/L.

At the time of sample collection, Veolia conducts in-house sampling for perchlorate for the individual discrete effluent samples. In-house results for the effluent samples for June 17 and 18 were non-detect. On June 19, the in-house Ion Chromatography (IC) machine broke, so Veolia did not conduct in-house analysis for the samples collected on June 19, 20, 21, 22, or 23.

At the time the effluent-composite sample results from MWH came back elevated, Veolia decided to analyze the discrete effluent samples for the days that in-house results were not available (i.e., June 19, 20, 21, 22, and 23). Unfortunately, the effluent sample from June 19 had been exhausted during the re-composite preparation. Therefore, on July 23, the effluent discrete samples for June 20, 21,

22, and 23 were sent to Silver State laboratory (certification for perchlorate analyses pending) to identify the perchlorate concentrations for each day in question. The results from Silver State, which were reported to Veolia on July 25, for the effluent discrete samples for June 20, 21, 22, and 23 were non-detect for perchlorate. At this time, Veolia suspected that the influent and effluent discrete samples from June 19 had been switched.

On July 25, a six-day (excluding June 19) effluent-composite sample, the effluent discrete samples for June 17 and 18 (to confirm in-house test results), and the influent discrete samples for all seven days were sent to Silver State.

Also, on July 25, a six-day (excluding June 19) effluent-composite, a six-day (excluding June 19) influent-composite, and the influent discrete samples from all seven days were sent to MWH.

On July 26, Silver State reported the six-day (excluding June 19) effluent-composite, the effluent discrete samples from June 17 and 18, and the influent discrete sample from June 19 were all non-detect for perchlorate. Also, MWH reported that the six-day (excluding June 19) effluent-composite sample was non-detect for perchlorate and the six-day (excluding June 19) influent-composite sample was within the normal range (105,000 μg/L). Based on this information, it was determined that the sample bottles for June 19 had been switched.

On August 6, Silver State reported that all of the influent discrete samples sent on July 25 were all non-detect for perchlorate. This data was not consistent with the data reported by MWH for the same samples. MWH reported results between 100,000 μg/L and 110,000 μg/L for the seven influent discrete samples. Veolia contacted Silver State to have the samples reanalyzed. On August 7, Silver State reported that the non-detect data previously provided was incorrect due to high conductivity masking the perchlorate. Now, instead of non-detect, Silver State has reported that perchlorate concentrations in the influent discrete samples for all seven days range from 61,440 μg/L to 87,250 μg/L.

All of the analytical results for the influent and effluent samples for the week of June 23 are summarized in Table 1 below. Given that both the 7-day effluent-composite samples analyzed had elevated concentrations of perchlorate (310 and 1,100 μg/L), but the 6-day (excluding June 19) effluent-composite sample was non-detect for perchlorate, Veolia believes that the discrete effluent sample from June 19 had an elevated perchlorate concentration. A discussion of the possible reasons the June 19 discrete effluent sample had high perchlorate concentrations is provided below.

Table 1
Summary of Effluent and Influent Results for Perchlorate
Week of June 23, 2012

Sample Name	Sample Date	Perchlorate Concentration (μg/L)	Who Analyzed Sample	Date Sample was Analyzed
Effluent				
Effluent-Comp	6/17 – 6/23	310	MWH	7/18
Effluent-Comp	6/17 – 6/23	1,100 (H3)	MWH	7/25
Effluent-Comp	6/17 – 6/23 (excluding 6/19)	ND (H3)	MWH	7/26
Effluent-Comp	6/17 – 6/23 (excluding 6/19)	ND	Silver State	7/26
Effluent	6/17	ND	Veolia In-House	6/17

Table 1
Summary of Effluent and Influent Results for Perchlorate
Week of June 23, 2012

Sample Name	Sample Date	Perchlorate Concentration (µg/L)	Who Analyzed Sample	Date Sample was Analyzed
Effluent	6/17	ND	Silver State	7/26
Effluent	6/18	ND	Veolia In-House	6/18
Effluent	6/18	ND	Silver State	7/26
Effluent	6/19	Not Analyzed[1]	--	--
Effluent	6/20	ND	Silver State	7/25
Effluent	6/21	ND	Silver State	7/25
Effluent	6/22	ND	Silver State	7/25
Effluent	6/23	ND	Silver State	7/25
Influent				
Influent-Comp	6/17 – 6/23	92,000	MWH	7/18
Influent-Comp	6/17 – 6/23 (excluding 6/19)	105,000 (H3)	MWH	7/26
Influent	6/17	100,000 (H3)	MWH	7/30
Influent	6/17	72,840[2]	Silver State	7/26, reanalyzed on 8/3
Influent	6/18	110,000 (H3)	MWH	7/30
Influent	6/18	78,800[2]	Silver State	7/26, reanalyzed on 8/3
Influent	6/19	110,000 (H3)	MWH	7/30
Influent	6/19	61,440[2]	Silver State	7/26, reanalyzed on 8/3
Influent	6/20	110,000 (H3)	MWH	7/30
Influent	6/20	78,400[2]	Silver State	7/26, reanalyzed on 8/3
Influent	6/21	100,000 (H3)	MWH	7/30
Influent	6/21	70,400[2]	Silver State	7/26, reanalyzed on 8/3
Influent	6/22	110,000 (H3)	MWH	7/30
Influent	6/22	87,250[2]	Silver State	7/26, reanalyzed on 8/3
Influent	6/23	110,000 (H3)	MWH	7/30
Influent	6/23	67,600[2]	Silver State	7/26, reanalyzed on 8/3

Notes:
Comp: composite
ND: non-detect
H3: For MWH samples, sample was received and analyzed past holding time. Data not acceptable for regulatory compliance.
[1] No discrete effluent sample from 6/19 was analyzed, due to Veolia's in-house IC machine breaking on 6/19 and the effluent sample being exhausted during the re-composite preparation on 7/23.
[2] Silver State originally reported the result as ND on July 30. On August 7, Silver State reported that the ND data was incorrect due to the samples being above the Maximum Conductivity Threshold. This resulted in an interference that caused the erroneous ND results originally reported.

Week of July 7, 2012 Effluent Composite Sample

For the week ending on July 7, grab samples of the influent and effluent were collected each day on July 1, 2, 3, 4, 5, 6, and 7. Seven-day composite samples of both the influent and effluent were prepared by Veolia on July 9 and sent to MWH. MWH acknowledged receipt of the samples on July 10, and the samples were analyzed for perchlorate on July 24/25. In the laboratory report dated July 30, the effluent-composite result was 220 μg/L, which was higher than the typical non-detect (<4 μg/L). The influent-composite result was 100,000 μg/L, which is a typical influent concentration.

As previously stated above, on June 19, prior to analyzing the discrete effluent sample for that day, Veolia's in-house IC machine became inoperable. On July 25, a technician from Dionex repaired and performed general preventative maintenance on the IC.

On July 26, Veolia's in-house lab technician began analyzing both daily discrete effluent and weekly composite effluent samples for perchlorate from June 20 to current. In-house analysis indicated an elevated discrete effluent result of 1,773 μg/L for the July 3rd sample and an elevated effluent-composite result of 254 μg/L for the week ending July 7. Veolia contacted MWH and Susan Crowley (NERT consultant) to verify these results.

On July 30, Veolia personnel sent the influent discrete sample from July 3 to MWH (to determine if the influent and effluent bottles had been switched). On August 7, MWH indicated that the influent discrete sample from July 3 had a result of 100,000 μg/L.

Additionally, on July 30, to verify if the influent and effluent sample bottles for July 3 had been switched, Veolia sent a daily discrete sample from both the influent and effluent for July 3, to Silver State. On August 7, Silver State reported that the influent discrete sample from July 3 had a result of 66,800 μg/L and the discrete effluent sample had a result of 1,811 μg/L.

On August 9, re-composites of both the influent and effluent and daily discrete samples from both the influent and effluent were sent to MWH. On August 29, MWH provided the results of the August 9 samples. The results indicated the same effluent-composite result of 220 μg/L perchlorate and a July 3 discrete effluent sample result of 1,600 μg/L for perchlorate, with the other six discrete effluent samples from that week being non-detect. Results from the other effluent and influent samples are included in Table 2 below.

A discussion of the possible reasons the July 3 discrete effluent sample had high perchlorate concentrations is provided below.

Table 2
Summary of Effluent and Influent Results for Perchlorate
Week of July 7, 2012

Sample Name	Sample Date	Perchlorate Concentration (μg/L)	Who Analyzed Sample	Date Sample was Analyzed
Effluent				
Effluent-Comp	7/1 – 7/7	220	MWH	7/25
Effluent-Comp	7/1 – 7/7	220 (H3)	MWH	8/15
Effluent-Comp	7/1 – 7/7	254	Veolia In-House	7/26
Effluent	7/1	ND (H3)	MWH	8/15

Table 2 Summary of Effluent and Influent Results for Perchlorate Week of July 7, 2012				
Sample Name	**Sample Date**	**Perchlorate Concentration (µg/L)**	**Who Analyzed Sample**	**Date Sample was Analyzed**
Effluent	7/1	ND	Veolia In-House	7/26
Effluent	7/2	ND (H3)	MWH	8/15
Effluent	7/2	ND	Veolia In-House	7/26
Effluent	7/3	1,600 (H3)	MWH	8/15
Effluent	7/3	1,773	Veolia In-House	7/26
Effluent	7/3	1,811	Silver State	8/3
Effluent	7/4	ND (H3)	MWH	8/15
Effluent	7/4	ND	Veolia In-House	7/26
Effluent	7/5	ND (H3)	MWH	8/15
Effluent	7/5	ND	Veolia In-House	7/26
Effluent	7/6	ND (H3)	MWH	8/15
Effluent	7/6	ND	Veolia In-House	7/26
Effluent	7/7	ND (H3)	MWH	8/15
Effluent	7/7	ND	Veolia In-House	7/26
Influent				
Influent-Comp	7/1 – 7/7	100,000	MWH	7/25
Influent-Comp	7/1 – 7/7	98,000 (H3)	MWH	8/15
Influent	7/1	99,000 (H3)	MWH	8/15
Influent	7/2	100,000 (H3)	MWH	8/15
Influent	7/3	100,000 (H3)	MWH	7/31
Influent	7/3	100,000 (H3)	MWH	8/15
Influent	7/3	66,800	Silver State	8/3
Influent	7/4	98,000 (H3)	MWH	8/15
Influent	7/5	98,000 (H3)	MWH	8/15
Influent	7/6	100,000 (H3)	MWH	8/15
Influent	7/7	100,000 (H3)	MWH	8/15

Notes:
Comp: composite
ND: non-detect
H3: For MWH samples, sample was received and analyzed past holding time. Data not acceptable for regulatory compliance.

Possible Causes and Corrective Actions

Veolia reviewed operating conditions in the fluidized bed reactors (FBRs) for both June 19 and July 3 to try to understand the elevated perchlorate concentrations in the discrete effluent samples on these two days. The primary parameter reviewed was sulfide concentrations in the FBR discharge. Sulfide concentrations are an indicator of perchlorate destruction effectiveness.

Based on Veolia's review, the FBRs were operating within normal ranges and there was no indication that perchlorate destruction was compromised on either June 19 or July 3.

Veolia suspects that the elevated effluent perchlorate concentrations for both June 19 and July 3 are the result of human sampling error or sample cross contamination. It is possible that at the time of sample collection, the sample collector had previously been working with or around the influent stream and did not take the necessary precautions of decontamination prior to collecting the effluent sample. Furthermore, at the time both of these samples were collected, the sample containers had been used, decontaminated, and reused several times. The water used for decontaminating was untreated water from Lake Mead. This water is believed to contain trace amounts of Perchlorate. To eliminate the possibility of cross contamination in the future, new laboratory grade sample bottles were purchased and are currently being used. Also, in the future deionized water will be used for cleaning.

To further maintain sample integrity, sample collectors have been re-trained on proper sampling locations, procedures and sample handling. Also, once a sample is collected, the sample container is sealed with a custody seal to prevent sample tampering.

Also, as part of the corrective actions, if the IC becomes inoperable, a portion of the discrete effluent samples will be sent to Silver State laboratory to verify that the water being discharged to the Las Vegas Wash meets effluent requirements.

Previously, to ensure proper destruction of the perchlorate, sulfide concentrations in the FBR discharge were maintained at >1,000 μg/L. If sulfide concentrations were <1,000 μg/L, Veolia personnel were instructed to divert the effluent discharge from the Las Vegas Wash to the GW-11 holding pond. To further ensure perchlorate destruction, this operating parameter has been increased from >1,000 μg/L to >1,500 μg/L.

Conclusion

Based on possible causes and review of the FBR operating data, it is believed that on both days, June 19 and July 3, the elevated effluent perchlorate concentrations were the result of human sampling error or sample cross contamination and elevated perchlorate was not discharged to the Las Vegas Wash.

Attachment B

Revised June 2012 Discharge Monitoring Report (DMR)

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

PERMITTEE NAME/ADDRESS
Name: Nevada Environmental Response Trust
Address: CO Veolia Water NA
510 Fourth Street
Henderson, NV. 89015
Facility: Nevada Environmental Response Trust
Location: Henderson, NV
Attn: Susan M. Crowley

NV 0023060	001
PERMIT NUMBER	DISCHARGE NUMBER

NO DISCHARGE ☐
NOTE: Read instructions before completing this form

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	12	06	01	TO	12	06	30

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		30 Day Ave	7 Day Average	UNITS	30 Day Ave (mg/l)	7 Day Ave (mg/l)	30 Day Ave(lbs/day)	UNITS			
Flow	SAMPLE MEASUREMENT	1.28	1.33	MGD	******	******	******		0	Cont	Flow Meter
Effluent	PERMIT REQUIREMENT	1.45 MGD Maximum	1.75 MGD Maximum		******	******	******				
BOD5 (Inhibited)	SAMPLE MEASUREMENT	******	******	****	1.0	1.0	10.84	MG/L	0	Weekly	Discrete
Influent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	Monitor & Report	Monitor & Report				
BOD5 (Inhibited)	SAMPLE MEASUREMENT	******	******	****	2.5	5.1	33.40	MG/L	0	Weekly	Discrete
Effluent	PERMIT REQUIREMENT	******	******	****	25 mg/L	40 mg/L	254 lbs/day				
Perchlorate FBR	SAMPLE MEASUREMENT	******	******	****	97	100	1,044	MG/L	0	Weekly	Comp
Influent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	Monitor & Report	Monitor & Report				
Perchlorate FBR	SAMPLE MEASUREMENT	******	******	****	62.61	310.00	0.64	UG/L	0	Weekly	Comp
Effluent	PERMIT REQUIREMENT	******	******	****	18 ug/l	Monitor & Report	0.22 lbs/day				
pH	SAMPLE MEASUREMENT	******	******	****	7.1	7.5	******	SU	0	Weekly	Discrete
Effluent	PERMIT REQUIREMENT	******	******	****	6.5 Minimum	9.0 Maximum	******				
Hexavalent Chormium	SAMPLE MEASUREMENT	******	******	****	0.035	0.036	0.375	MG/L	0	Weekly	Discrete
Influent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	Monitor & Report	Monitor & Report				

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER
Susan Crowley
CEM 1428, exp 3-8-13
TYPED OR PRINTED

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 GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE 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 IMPRSIONMENT FOR KNOWING VIOLATIONS.

SIGNATURE OF PRICIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE		DATE		
702	592-7727	2012	September	6
AREA CODE	NUMBER	YEAR	MONTH	DAY

COMMENT AND EXPANATION OF ANY VIOLATIONS (Reference all attachments here)

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

PERMITTEE NAME/ADDRESS
Name: Nevada Environmental Response Trust
Address: CO Veolia Water NA
510 Fourth Street
Henderson, NV. 89015
Facility: Nevada Environmental Response Trust
Location: Henderson, NV
Attn: Susan M. Crowley

NV 0023060	001
PERMIT NUMBER	DISCHARGE NUMBER

NO DISCHARGE [ ]
NOTE: Read instructions before completing this form

MONITORING PERIOD

	YEAR	MO	DAY		YEAR	MO	DAY
FROM	12	06	01	TO	12	06	30

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		30 Day Ave	7 Day Average	UNITS	30 Day Ave (mg/l)	7 Day Ave (mg/l)	30 Day Ave(lbs/day)	UNITS			
Hexavalent Chromium	SAMPLE MEASUREMENT	******	******	****	0.000	0.000	0.000	MG/L	0	Weekly	Discrete
Effluent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	0.01 mg/l	Monitor & Report				
Total Chromium	SAMPLE MEASUREMENT	******	******	****	0.046	0.060	0.413	MG/L	0	Weekly	Discrete
Influent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	Monitor & Report	Monitor & Report				
Total Chromium	SAMPLE MEASUREMENT	******	******	****	0.009	0.011	0.101	MG/L	0	Weekly	Discrete
Effluent	PREMIT REQUIREMENT	******	******	****	Monitor & Report	0.1 mg/l	Monitor & Report				
Total Suspended Solids	SAMPLE MEASUREMENT	******	******	****	15.75	20.00	174.33	MG/L	0	Weekly	Discrete
Effluent	PERMIT REQUIREMENT	******	******	****	135 mg/l	Monitor & Report	1,634 lbs/day				
Iron, Total	SAMPLE MEASUREMENT	******	******	****	3.50	4.30	43.01	MG/L	0	Weekly	Discrete
Effluent	PERMIT REQUIREMENT	******	******	****	10 mg/l	Monitor & Report	121.03 lbs/day				
Manganese	SAMPLE MEASUREMENT	******	******	****	*	******	*	MG/L	0	Quarterly	Discrete
Effluent	PERMIT REQUIREMENT	******	******	****	5 mg/l	NA	60.52 lbs/day				
Total Phosphorus, as P	SAMPLE MEASUREMENT	******	******	****	0.045	0.060	0.588	MG/L	0	Weekly	Discrete
Influent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	Monitor & Report	Monitor & Report				

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER
Susan Crowley
CEM 1428, exp 3-8-13
TYPED OR PRINTED

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 GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE 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 IMPRSIONMENT FOR KNOWING VIOLATIONS.

SIGNATURE OF PRICIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE		DATE		
702	592-7727	2012	September	6
AREA CODE	NUMBER	YEAR	MONTH	DAY

COMMENT AND EXPANATION OF ANY VIOLATIONS (Reference all attachments here)
* Monitoring frequency is quarterly. Please See April 2012 DMR for analyte information.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

PERMITTEE NAME/ADDRESS
Name: Nevada Environmental Response Trust
Address: CO Veolia Water NA
510 Fourth Street
Henderson, NV. 89015
Facility: Nevada Environmental Response Trust
Location: Henderson, NV
Attn: Susan M. Crowley

NV 0023060	001
PERMIT NUMBER	DISCHARGE NUMBER

NO DISCHARGE [ ]
NOTE: Read instructions before completing this form

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	12	06	01	TO	12	06	30

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		30 Day Ave	7 Day Average	UNITS	30 Day Ave (mg/l)	7 Day Ave (mg/l)	30 Day Ave(lbs/day)	UNITS			
Total Phosphorus, as P	SAMPLE MEASUREMENT	******	******	****	0.191	0.350	2.575	MG/L	0	Weekly	Discrete
Effluent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	Monitor & Report	20 lbs/day				
Total Ammonia, as N	SAMPLE MEASUREMENT	******	******	****	0.11	0.23	1.17	MG/L	0	Weekly	Discrete
Effluent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	Monitor & Report	40 lbs/day				
Attachment A	SAMPLE MEASUREMENT	******	******	****	Please see attached results				0	Quarterly	Discrete
Effluent	PREMIT REQUIREMENT	******	******	****	Monitor & Report	Monitor & Report	Monitor & Report				
Color	SAMPLE MEASUREMENT	******	******	****	6	10	******	ACU	0	Weekly	Discrete
Influent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	Monitor & Report	******				
Color	SAMPLE MEASUREMENT	******	******	****	27.50	40.00	******	ACU	0	Weekly	Discrete
Effluent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	Monitor & Report	******				
Total Inorganic Nitrogen, as N	SAMPLE MEASUREMENT	******	******	****	10.50	11.00	114.27	MG/L	0	Weekly	Discrete
Influent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	Monitor & Report	Monitor & Report				
Total Inorganic Nitrogen, as N	SAMPLE MEASUREMENT	******	******	****	0.21	0.23	2.18	MG/L	0	Weekly	Discrete
Effluent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	Monitor & Report	Monitor & Report				

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER
Susan Crowlev
CEM 1428, exp 3-8-13
TYPED OR PRINTED

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 GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE 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 IMPRSIONMENT FOR KNOWING VIOLATIONS.

SIGNATURE OF PRICIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE		DATE		
702	592-7727	2012	September	6
AREA CODE	NUMBER	YEAR	MONTH	DAY

COMMENT AND EXPANATION OF ANY VIOLATIONS (Reference all attachments here)

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

PERMITTEE NAME/ADDRESS
Name: Nevada Environmental Response Trust
Address: CO Veolia Water NA
510 Fourth Street
Henderson, NV. 89015
Facility: Nevada Environmental Response Trust
Location: Henderson, NV
Attn: Susan M. Crowley

NV 0023060	001
PERMIT NUMBER	DISCHARGE NUMBER

NO DISCHARGE [ ]
NOTE: Read instructions before completing this form

MONITORING PERIOD

	YEAR	MO	DAY		YEAR	MO	DAY
FROM	12	06	01	TO	12	06	30

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		30 Day Ave	7 Day Average	UNITS	30 Day Ave (mg/l)	7 Day Ave (mg/l)	30 Day Ave(lbs/day)	UNITS			
Sulfate Influent	SAMPLE MEASUREMENT	******	******	****	1,400	******	13,459	MG/L	0	Monthly	Discrete
	PERMIT REQUIREMENT	******	******	****	Monitor & Report	******	Monitor & Report				
Sulfate Effluent	SAMPLE MEASUREMENT	******	******	****	1,100	******	12,146	MG/L	0	Monthly	Discrete
	PERMIT REQUIREMENT	******	******	****	Monitor & Report	******	Monitor & Report				
Total Dissolved Solids Influent	SAMPLE MEASUREMENT	******	******	****	*	******	*	MG/L	0	Quarterly	Discrete
	PREMIT REQUIREMENT	******	******	****	Monitor & Report	******	Monitor & Report				
Total Dissolved Solids Effluent	SAMPLE MEASUREMENT	******	******	****	*	******	*	MG/L	0	Quarterly	Discrete
	PERMIT REQUIREMENT	******	******	****	Monitor & Report	******	Monitor & Report				
Sulfide Influent	SAMPLE MEASUREMENT	******	******	****	0.01	******	0.13	MG/L	0	Monthly	Discrete
	PERMIT REQUIREMENT	******	******	****	Monitor & Report	******	Monitor & Report				
Sulfide Effluent	SAMPLE MEASUREMENT	******	******	****	0.01	******	0.13	MG/L	0	Monthly	Discrete
	PERMIT REQUIREMENT	******	******	****	Monitor & Report	******	Monitor & Report				
Oil & Grease Influent	SAMPLE MEASUREMENT	******	******	****	*	******	*	MG/L	0	Quarterly	Discrete
	PERMIT REQUIREMENT	******	******	****	Monitor & Report	******	Monitor & Report				

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER
Susan Crowley
CEM 1428, exp 3-8-13
TYPED OR PRINTED

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 GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE 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 IMPRSIONMENT FOR KNOWING VIOLATIONS.

SIGNATURE OF PRICIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE		DATE		
702	592-7727	2012	September	6
AREA CODE	NUMBER	YEAR	MONTH	DAY

COMMENT AND EXPANATION OF ANY VIOLATIONS (Reference all attachments here)
* Monitoring frequency is quarterly. Please See April 2012 DMR for analyte information.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

PERMITTEE NAME/ADDRESS
Name: Nevada Environmental Response Trust
Address: CO Veolia Water NA
510 Fourth Street
Henderson, NV. 89015
Facility: Nevada Environmental Response Trust
Location: Henderson, NV
Attn: Susan M. Crowley

NV 0023060	001
PERMIT NUMBER	DISCHARGE NUMBER

NO DISCHARGE [ ]
NOTE: Read instructions before completing this form

MONITORING PERIOD

	YEAR	MO	DAY		YEAR	MO	DAY
FROM	12	06	01	TO	12	06	30

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		30 Day Ave	7 Day Average	UNITS	30 Day Ave (mg/l)	7 Day Ave (mg/l)	30 Day Ave(lbs/day)	UNITS			
Oil & Grease	SAMPLE MEASUREMENT	******	******	****	*	******	*	MG/L	0	Quarterly	Discrete
Effluent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	******	Monitor & Report				
Boron	SAMPLE MEASUREMENT	******	******	****	*	******	*	MG/L	0	Quarterly	Discrete
Effluent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	******	Monitor & Report				
Dissolved Oxygen	SAMPLE MEASUREMENT	******	******	****	7.68	8.09	83.20	MG/L	0	Weekly	Discrete
Effuent	PREMIT REQUIREMENT	******	******	****	Monitor & Report	Monitor & Report	Monitor & Report				
Nitrate as N	SAMPLE MEASUREMENT	******	******	****	0.17	******	1.36	MG/L	0	Monthly	Discrete
Effluent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	******	Monitor & Report				
Kjeldahl Nitrogen as N	SAMPLE MEASUREMENT	******	******	****	0.03	0.04	0.48	MG/L	0	Weekly	Discrete
Influent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	Monitor & Report	Monitor & Report				
Kjeldahl Nitrogen as N	SAMPLE MEASUREMENT	******	******	****	1.10	1.50	12.14	MG/L	0	Weekly	Discrete
Effluent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	Monitor & Report	Monitor & Report				
Chloride	SAMPLE MEASUREMENT	******	******	****	*	******	*	MG/L	0	Quarterly	Discrete
Influent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	******	Monitor & Report				

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER
Susan Crowley
CEM 1428, exp 3-8-13
TYPED OR PRINTED

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 GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE 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 IMPRSIONMENT FOR KNOWING VIOLATIONS.

SMCrowley
SIGNATURE OF PRICIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE		DATE		
702	592-7727	2012	September	6
AREA CODE	NUMBER	YEAR	MONTH	DAY

COMMENT AND EXPANATION OF ANY VIOLATIONS (Reference all attachments here)
* Monitoring frequency is quarterly. Please See April 2012 DMR for analyte information.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

PERMITTEE NAME/ADDRESS
Name: Nevada Environmental Response Trust
Address: CO Veolia Water NA
510 Fourth Street
Henderson, NV. 89015
Facility: Nevada Environmental Response Trust
Location: Henderson, NV
Attn: Susan M. Crowley

NV 0023060	001
PERMIT NUMBER	DISCHARGE NUMBER

NO DISCHARGE [ ]
NOTE: Read instructions before completing this form

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	12	07	01	TO	12	07	31

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		30 Day Ave	7 Day Average	UNITS	30 Day Ave (mg/l)	7 Day Ave (mg/l)	30 Day Ave(lbs/day)	UNITS			
Chloride	SAMPLE MEASUREMENT	******	******	****	*	******	*	MG/L	0	Quarterly	Discrete
Effluent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	******	Monitor & Report				
Chlorate	SAMPLE MEASUREMENT	******	******	****	220	******	2,396	MG/L	0	Monthly	Discrete
Influent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	******	Monitor & Report				
Chlorate	SAMPLE MEASUREMENT	******	******	****	0.00	******	0.00	MG/L	0	Monthly	Discrete
Effluent	PERMIT REQUIREMENT	******	******	****	Monitor & Report	******	Monitor & Report				
	SAMPLE MEASUREMENT	******	******	****					0		
	PERMIT REQUIREMENT	******	******	****							
	SAMPLE MEASUREMENT	******	******	****					0		
	PERMIT REQUIREMENT	******	******	****							

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER
Susan Crowley
CEM 1428, exp 3-8-13
TYPED OR PRINTED

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 GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE 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 IMPRSIONMENT FOR KNOWING VIOLATIONS.

SIGNATURE OF PRICIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE		DATE		
702	592-7727	2012	September	6
AREA CODE	NUMBER	YEAR	MONTH	DAY

COMMENT AND EXPANATION OF ANY VIOLATIONS (Reference all attachments here)
* Monitoring frequency is quarterly. Please See April 2012 DMR for analyte information.