

September 19, 2014

Compliance Coordinator Nevada Division of Environmental Protection Bureau of Water Pollution Control 901 South Stewart Street, Suite 4001 Carson City, Nevada 89701-5249

RE: Report of Spill of Treated Groundwater from Effluent Discharge Pipeline NPDES Permit NV0023060 Incident No. 140915-02

Dear Compliance Coordinator:

The Nevada Environmental Response Trust (Trust) maintains a National Pollutant Discharge Elimination System (NPDES) Permit NV0023060 for discharge of treated water to the Las Vegas Wash as part of their on-going effort to capture and treat groundwater containing perchlorate and other contaminants of concern at the Trust's site in Henderson, Nevada. Tetra Tech is submitting this letter on behalf of the Trust to provide written documentation of a spill from the treated groundwater effluent line that runs from the treatment plant at the site to the discharge point at the wash.

On September 15, 2014, Envirogen Technologies Inc. (ETI), the operator of the groundwater extraction and treatment system (GWETS), received a call from the City of Henderson to notify them that the effluent pipe in the vicinity of Galleria Road and Burkholder Boulevard appeared to be broken. ETI immediately stopped discharging treated water down the effluent pipe and directed the treated effluent to GW-11, a large storage pond on the site. During the period of diversion, approximately 200,000 gallons of effluent was diverted to GW-11. There was no measurable increase in the pond level and the available storage remains at approximately 13.4 days, or approximately 68% of permitted capacity.

ETI also called their on-call pipeline contractor to evaluate the situation and determine the required repair. ETI then notified Tetra Tech who notified the Trust who then notified the Bureau of Corrective Actions. The incident was also reported via telephone at approximately 3 PM on September 15, 2014 to the NDEP Spill Notification Line (report taken by Mr. Matt Donaldson and assigned Spill Incident No. 140915-02).

Per Section II.A.3.b. of the NPDES permit, a written report shall be submitted within 5 days of the spill and include the following information.

#### i. Time and date of discharge

The leak was reported to ETI at 10 AM PDT on September 15, 2014. The exact time that the leak started is unknown.

#### ii. Exact location and estimated amount of discharge

The leak occurred from a damaged combination air release valve in the vicinity of Galleria Road and Burkholder Boulevard in Henderson, Nevada. It was determined that the leak was flowing at up to 2 gpm. The leak was likely flowing for less than 24 hours. Therefore, the maximum volume released is less than 3,000 gallons, but appeared to be less than 1,000 gallons based on the amount of wet soil. The release never reached any drainages or waterways.

# iii. Flow path and any bodies of water which the discharge reached

The release was primarily absorbed into the soil and never reached any drainages or waterways.

# iv. The specific cause of the discharge

The leak was caused by someone or something hitting a valve box that contained a combination air release valve, damaging the valve and causing a leak. No additional information is available at this time regarding the cause of the damage.

### v. The preventive and/or corrective actions taken

ETI called their on-call pipeline contractor, Raphael Construction, to evaluate the possible pipe break and determine the required repair. Raphael Construction determined that combination valve was stuck open and required repair. Rafael Construction completed the repair of the valve and ETI began discharging back to the Las Vegas Wash by 3:50 PM PDT. The Trust is assessing options of marking the pipeline and valve boxes to increase visibility.

Please let me know if you have any questions. I can be reached at 720-931-9372 or via email at <a href="mailto:frank.johns@tetratech.com">frank.johns@tetratech.com</a>.

Sincerely,

Tetra Tech, Inc.

Frank J Johns, II

Vice President and Principal Engineer

Copies: Regional Administrator, USEPA Region 9

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Michael Delvecchio, Envirogen Technologies, Inc. Allan DeLorme, ENVIRON International Corporation