



October 13, 2014

Mr. Weiquan Dong, PE
Bureau of Corrective Actions, Special Projects Branch
Nevada Division of Environmental Protection
2030 E. Flamingo Rd., Suite 230
Las Vegas, Nevada 89119

Mr. Jay A. Steinberg, not individually but solely in his representative capacity as President of the Nevada Environmental Response Trust Trustee
Nevada Environmental Response Trust
35 East Wacker Drive, Suite 1550
Chicago, Illinois 60601

**Re: Site Management Plan (SMP) Work Plan and Contingency Plan for Implementation of Field Sampling Plan, Revision 1
Nevada Environmental Response Trust Site, Henderson, Nevada**

Dear Mr. Dong and Mr. Steinberg,

ENVIRON International Corporation (ENVIRON) is pleased to present this Work Plan and Contingency Plan document, which has been prepared to describe the planned soil disturbing field activities that will take place during the implementation of the approved Field Sampling Plan, Revision 1 (FSP)¹ for the Nevada Environmental Response Trust (NERT) site (the "site") in Henderson, Nevada. This Work Plan and Contingency Plan has been prepared in accordance with the Site Management Plan, Revision 1 (SMP)². Approval of this Work Plan and Contingency Plan by the Nevada Division of Environmental Protection (NDEP) and the Trust is required prior to initiating the work described herein.

Per section 3.1 of the SMP, ENVIRON is providing notification to NDEP and the Trust for activities to be conducted on-site as part of the FSP implementation. According to Section 4.1 of the SMP, a work plan is required when soil disturbing activities will be conducted within an excavation control area (ECA). In addition, Section 5.3.5 of the SMP requires preparation of a contingency plan prior to activities taking place within 50 feet of any on-site component of the Groundwater Extraction and Treatment System (GWETS), which is currently operated for the Trust by Envirogen Technologies, Inc. (ETI).

This document provides a summary of field activities that are to be conducted within ECAs at the site, as defined in Section 4.1 and Appendix B of the SMP. In addition, this document includes a contingency plan detailing procedures and equipment that ENVIRON or its contractors would use if FSP activities were to cause damage to any groundwater remediation system component in a manner that causes the release of untreated groundwater. Lastly, this document provides information regarding the potential for investigation activities to uncover previously unknown contamination and procedures to be followed in the event of such a discovery, including a description of requested exemptions to SMP requirements during FSP activities.

¹ ENVIRON. 2014. Field Sampling Plan, Revision 1, Nevada Environmental Response Trust Site; Henderson, Nevada. July 18. Approved by NDEP on August 1, 2014.

² ENVIRON. 2013. Site Management Plan, Revision 1, Nevada Environmental Response Trust Site, Henderson, Nevada. October. Approved by NDEP on November 7, 2013.

The FSP details the sampling locations, procedures, and methods to be used during the field investigation activities.

Anticipated Activities

As described in the FSP, ENVIRON plans to excavate three on-site test pits, drill 63 on-site borings, and install 23 wells (eight on-site and 15 off-site) in order to further characterize subsurface conditions at the site. Test pits are expected to be excavated using a backhoe or excavator, and soil borings and wells are expected to be installed using a rotary sonic drilling rig. The work will be completed by ENVIRON personnel and ENVIRON's subcontractors.

Some of the proposed investigation locations are located within ECAs. This document provides a list of affected ECAs and identifies the field activities that are expected to be performed within each ECA. FSP investigation locations and ECAs are shown on Figure 1.

Some proposed investigation locations are within approximately 50 feet of GWETS components. This document provides a contingency plan in the event that any remediation system component is damaged in a manner that causes the release of untreated groundwater. Although not explicitly required by the SMP, work conducted within 50 feet of off-site GWETS components will also be managed under this contingency plan. FSP investigation locations and nearby GWETS components are shown on Figure 2.

Work within Excavation Control Areas (ECAs)

Per Section 4.1 of the SMP, submittal of this Work Plan provides the required notification to NDEP and the Trust of soil disturbing activities within ECAs as listed below. In addition, the Work Plan is being submitted for NDEP and Trust approval per the requirements of Section 4.1 of the SMP.

FSP Activity	ECA in which FSP Activity is Located
Soil borings RISB-58, RISB-59, RISB-60, RISB-61, RISB-62, and RISB-63	C18
Well M-186D	C18
Wells M-189, M-190, M-191, and M-193	B1
Well M-192	B1, B6

Figure 1 shows ECA boundaries and locations of FSP activities to illustrate the information contained in the table above.

Contingency Plan for Work within 50 feet of a GWETS Component

Per Section 5.3 of the SMP, this Contingency Plan serves as notification to NDEP and the Trust that FSP activities will be conducted within 50 feet of a GWETS component where use of equipment may accidentally damage a well or other component of the GWETS. Because some of the FSP field activities, as summarized in the table below, will take place within 50 feet of a GWETS component, this Contingency Plan has been prepared for NDEP and Trust approval per Section 5.3.5 of the SMP.

FSP Activity	GWETS Component within 50 feet
Soil borings RISB-12 and RISB-14	Extraction and monitoring wells, underground pipeline
Soil borings RISB-16, RISB-18, RISB-27, RISB-29, RISB-40, RISB-56, RISB-57, RISB-58, and RISB-61	Monitoring wells
Wells M-161D and M-186D	Monitoring well
Test pits	Extraction and monitoring wells, underground pipeline

Figure 2 shows locations of activities in relation to the 50-foot safety envelopes around on-site GWETS components to illustrate the information contained in the table above.

Precautions

ENVIRON personnel and subcontractors will implement the following precautions and procedures during implementation of the FSP:

- Daily health and safety “tailgate” meetings will be held prior to the start of field work. In addition to discussions of health and safety hazards and preventions, the names and mobile phone numbers for all ENVIRON field staff and subcontractors will be confirmed. Clear lines of communication will be established each day to ensure a swift and coordinated response to a release.
- ETI will be advised of work that may impact their operations (i.e., work within 50 feet of any GWETS component).
- Protective barriers (e.g., barricades, traffic cones/pylons, caution tape, etc.) will be used as necessary when activities that involve the use of heavy equipment (i.e., backhoes, drill rigs) are performed near exposed wells or other exposed GWETS infrastructure.
- A private utility locator will clear each boring location for underground utilities and GWETS components prior to mobilization.
- ENVIRON field personnel will be on-site during mobilization and drilling activities to verify the location of GWETS components and to avoid accidental damage to above ground components.
- Work areas will be delineated as necessary to avoid unauthorized entry during FSP work.
- Prior to mobilizing from an ECA, wheels and tracks for equipment used will be decontaminated to avoid tracking out contaminants.

Spill Response Procedures

- The primary response action for a release of untreated groundwater during soil sampling and well installation activities will be to shut down and contain any uncontrolled flow. ETI will be notified immediately by phone or in person of the need to shut down due to uncontrolled flow. ETI personnel will have primary responsibility for shutting down the corresponding GWETS components.
- A spill response kit will be readily available during FSP activities and utilized in the event of a release of untreated groundwater. The precautionary measures described in this contingency plan are intended to minimize the volume of a potential release; therefore, it is anticipated that the spill response kit will adequately contain potential releases from FSP activities.

- As defined in the SMP, if soil sampling and well installation activities result in the release of untreated groundwater, ENVIRON will immediately notify Weiquan Dong of NDEP at (702) 486-2850, extension 252 and Andrew Steinberg of the Trust at (312) 498-2800 of the release and report on the status of the GWETS operation. If any GWETS components are shut down due to damage to the system(s) or to control the release of untreated groundwater, ENVIRON will provide NDEP, the Trust and ETI with a written explanation for the shutdown.
- If the FSP implementation results in the release of untreated groundwater, the release will be reported to the NDEP 24-Hour Spill Notification Line, if required by NAC 445A.345 to 445A.348.

SMP Exemptions

During FSP activities, previously unknown contamination is likely to be encountered. The results of sampling performed during FSP activities, including sampling of any previously unknown contamination, will be reported in the subsequent report. Due to the nature of the investigation, Section 4.3 "Contingency Actions for Encountering Previously Unknown Contaminated Soil" of the SMP will not be followed during FSP activities. If previously unknown contaminated soil is encountered, any additional samples needed to characterize impacted soil will be analyzed as described in the FSP.

Section 4.2 of the SMP, "Soil Management for ECA Soils" will be followed during the FSP activities with the exception of Section 4.2.4 "Confirmation Sampling for ECA Excavations" with regard to test pit excavations.

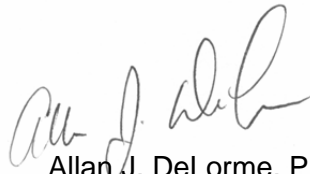
Closure

We would appreciate your prompt review and approval of this Work Plan and Contingency Plan. Please contact John Pekala at (602) 734-7710 or jpekala@environcorp.com if you have any comments or questions concerning this Work Plan and Contingency Plan.

Sincerely,



John M. Pekala, PG
Senior Manager
CEM #2347, expires 9/20/2016



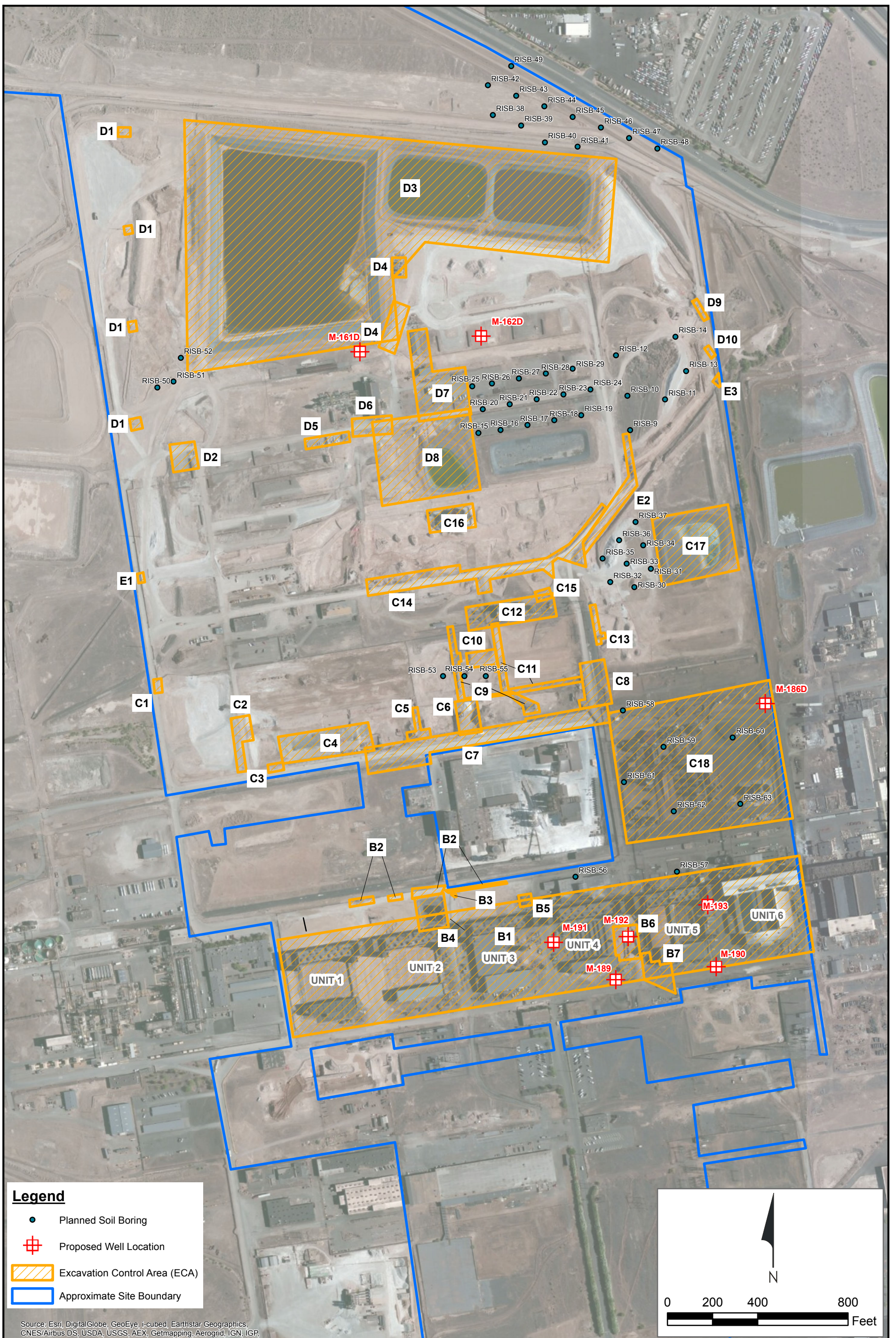
Allan J. DeLorme, PE
Principal

cc: BMI Compliance Coordinator, NDEP, BCA, Las Vegas
NDEP c/o Kirk Stowers, Broadbent and Associates, Inc.

ec: James Dotchin, NDEP
Greg Lovato, NDEP
Alison Fong, USEPA
Katherine Baylor, USEPA
Nevada Environmental Response Trust
Tanya O'Neill, Foley & Lardner LLP
Derek Amidon, Tetra Tech
Kirk Stowers, Broadbent & Associates, Inc.
Kurt Fehling, The Fehling Group
Jeff Gibson, AMPAC
Mark Paris, BMI

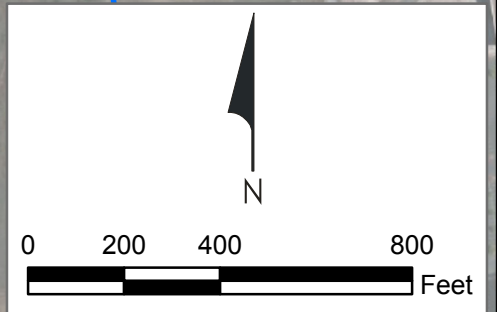
Lee Farris, Landwell
Ranajit Sahu, BMI
Joe Kelly, Montrose
Paul Sundberg, Montrose
Curt Richards, Olin
David Share, Olin
Chuck Elmendorf, Stauffer
Nick Pogoncheff, Stauffer
George Crouse, Syngenta
Richard Pfarrer, TIMET
Enoe Marcum, WAPA

Figures



Legend

- Planned Soil Boring
- Proposed Well Location
- Excavation Control Area (ECA)
- Approximate Site Boundary



Source: Esri, DigitalGlobe, GeoEye, i-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP.

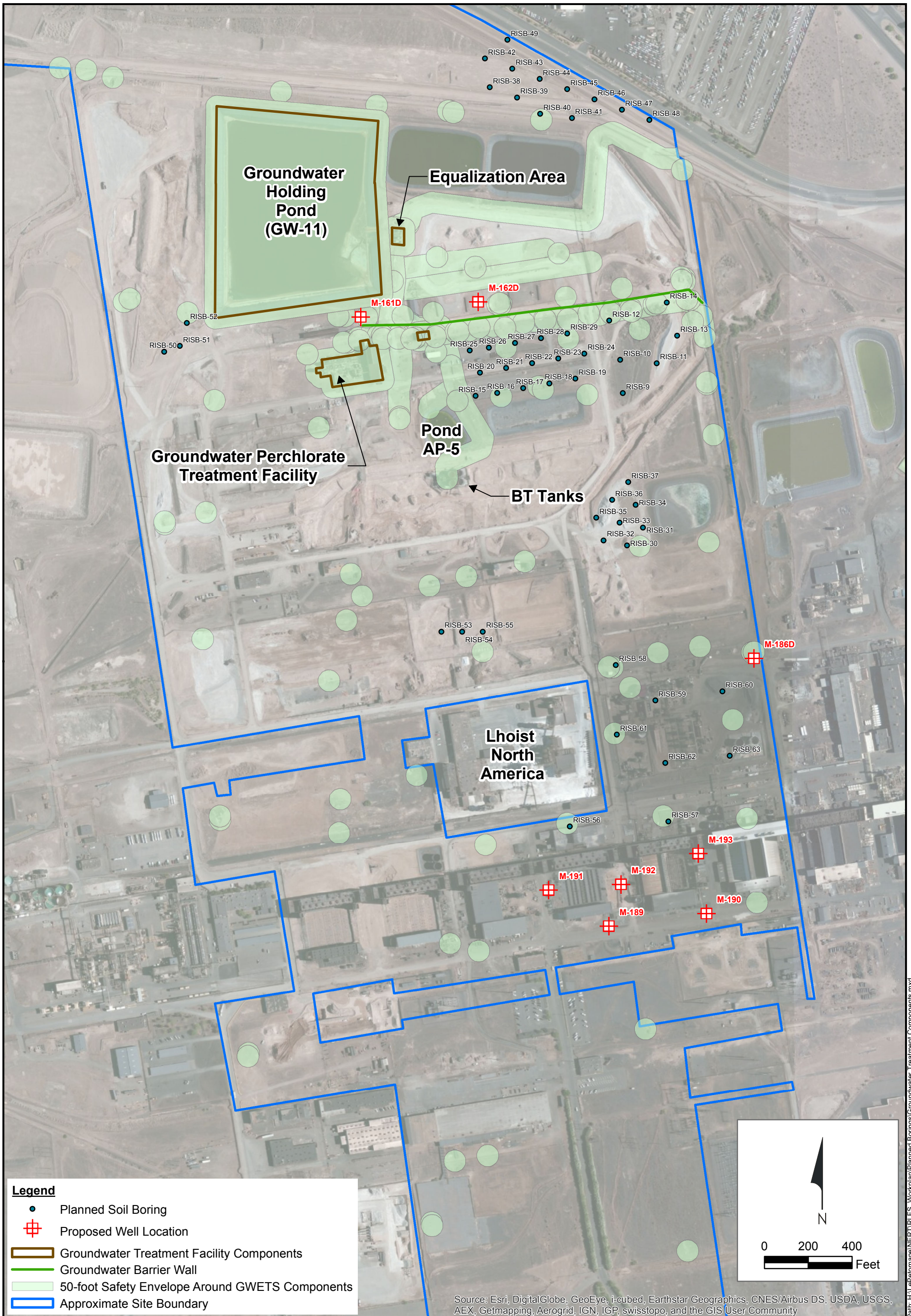


2200 Powell St., Suite 700, Emeryville, CA 94608

Investigation Locations and Excavation Control Areas Nevada Environmental Response Trust Site, Henderson, Nevada

Drafter: RS Date: 10/10/14 Contract Number: 21-348001 Approved by: Revised:

Figure
1



Legend

- Planned Soil Boring
- ⊠ Proposed Well Location
- ▭ Groundwater Treatment Facility Components
- Groundwater Barrier Wall
- 50-foot Safety Envelope Around GWETS Components
- ▭ Approximate Site Boundary

Source: Esri, DigitalGlobe, GeoEye, i-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

On-Site Groundwater Monitoring, Extraction, and Treatment Systems
 Nevada Environmental Response Trust Site, Henderson, Nevada

Figure
2

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