



April 27, 2015

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

**RE: Groundwater Discharge Permit NEV2001515 Discharge Monitoring Reports –
1st Quarter 2015**

Dear Compliance Coordinator:

The Nevada Environmental Response Trust (NERT or the Trust) maintains Groundwater Discharge Permit #NEV2001515 (the Permit), which covers the synthetically double-lined ponds GW-11 and AP-5 at the NERT site in Henderson, Nevada (the NERT Site). During 1st quarter 2015, no water was discharged directly to a receiving water body from either GW-11 Pond or AP-5 Pond. Treated water from the perchlorate treatment system at the NERT Site is discharged to the Las Vegas Wash pursuant to NPDES permit #NV0023060. The groundwater extraction and treatment system (GWETS) at the NERT Site is operated by Envirogen Technologies, Inc. (ETI).

AP-5 Pond

The Trust is in the process of decommissioning the AP-5 Pond. The water was removed from the pond during 2nd quarter 2013; however, water has occasionally been added since that time to keep the pond solids moist. Approximately 186,300 gallons of water was added to the AP-5 Pond on January 18, 2015. Activities related to the decommissioning are ongoing under the purview of Nevada Department of Environmental Protection (NDEP) Bureau of Corrective Actions. A Phase II Work Plan presenting Tetra Tech's evaluation for the removal of pond solids and all material, dated March 13, 2015, was approved by NDEP on March 24, 2015. The AP-5 Pond is a synthetically double-lined pond. The AP-5 pond's primary liner has a tear at the top edge of the pond. The split top liner has been sandbagged to prevent a strong breeze from lifting the edges. The sandbagged tear and several additional identified minor tears are being closely monitored. Liquid was detected in the AP-5 detection well during each of the six leak detection monitoring events conducted in the 1st quarter (Attachment 2). The detected liquid was transferred to GW-11 Pond. There is no evidence that the underlying liner has been compromised.

The Trust will be seeking a modification to Authorization to Discharge Permit No. NEV2001515 by May 15, 2015 to reflect changes in permit conditions associated with the plan's implementation.

GW-11 Pond

On March 27, 2014, the GW-11 Pond began operating as an equalization basin for the treatment plant. The use of the GW-11 Pond as an equalization basin temporarily ceased by diverting inflows directly to the treatment plant, twice during the 1st Quarter 2015, as summarized below:

- January 1 – On January 5, 2015 inflows into the GW-11 Pond were temporarily stopped to finish installing a new filtration system; and
- January 29 – On February 4, 2015 inflows into the GW-11 Pond were temporarily stopped to perform modifications on the new filtration system.

In a letter dated March 19, 2015 to Ms. Nikita Lingenfelter of Bureau of Water Pollution Control (BWPC), the Trust provided background information and informed BWPC of implemented and planned corrective actions related to the GW-11 Pond leak detection system. This letter was submitted in response to notification from BWPC to the Trust in October 2014 of a possible anomaly regarding previous DMRs submitted by Veolia and ETI on behalf of the Trust. As indicated in the Trust's response, pump installation depths were established by video surveys and the pumps were re-installed to corrected depths in the southwest, southeast, and northwest leak detection sumps. Video survey of the northeast leak detection sump could not be completed due to a separated joint in the sump pipe. On behalf of the Trust, Tetra Tech is currently evaluating how to repair the pipe so that the correct pump depth can be determined for the northeast sump. It was noted that the timeline for the repair may be lengthy due to the on-going use of the GW-11 Pond.

At the request of the Trust, Tetra Tech is evaluating the integrity of the GW-11 Pond liner by: (i) collecting liner samples to assess the remaining useful life of the primary and secondary GW-11 Pond liner systems; and (ii) installing piezometers in the down gradient north berm to evaluate if GW-11 Pond water is leaking through the secondary liner. The investigation field work is planned to be completed in May, 2015, and a written summary report will be submitted to NDEP BWPC in June 2015.

Closing

Attachment 1 includes the January, February, and March 2015 Discharge Monitoring Reports (DMRs). Attachment 2 includes the pond monitoring tables, which provide water balance and leak detection monitoring information. Attachment 3 includes an updated Nevada Certified Environmental Manager designation letter.

Should you have any questions concerning this report, please contact Kyle Hansen at (702) 966-8340 or kyle.hansen@tetrattech.com. Thank you.

Sincerely



Kyle S. Hansen, CEM
Field Operations Manager/Geologist
CEM 2167, exp. 9/18/16

Overnight Mail



Attachments:

Attachment 1: Discharge Monitoring Reports
Attachment 2: Pond Monitoring Results
Attachment 3: Updated CEM Designation Letter

cc: Greg Lovato, Bureau of Corrective Actions, NDEP
James Dotchin, Bureau of Corrective Actions, NDEP
Weiquan Dong, Bureau of Corrective Actions, NDEP
Nevada Environmental Response Trust
Tanya O'Neill, Foley and Lardner LLP
Todd Webster, Envirogen Technologies, Inc.
Michael Delvecchio, Envirogen Technologies, Inc.
Allan J. DeLorme, ENVIRON International Corporation
John Pekala, ENVIRON International Corporation
Kimberly Schmidt Kuwabara, ENVIRON International Corporation

Discharge Permit NEV2001515 – 1st Q 2015 DMR

CEM Certification

I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and, to the best of my knowledge, comply with all applicable federal, state and local statutes, regulations and ordinances.



Kyle S. Hansen
CEM 2167, expires 9-18-16

ATTACHMENT 1

Discharge Monitoring Reports



Adobe Acrobat
Document

January 2015



Adobe Acrobat
Document

February 2015



Adobe Acrobat
Document

March 2015

PERMITTEE NAME/ADDRESS
NAME: Nevada Environmental Response Trust
ADDRESS: c/o Envirogen Technologies
 510 Fourth Street
 Henderson, NV 89015

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)


NEV2001515	001
PERMIT NUMBER	DISCHARGE NUMBER


FACILITY: Nevada Environmental Response Trust
LOCATION: Henderson, NV
ATTN: Kyle Hansen

MONITORING PERIOD							
FROM:	15	01	01	TO:	15	01	31

NO DISCHARGE: X

NOTE: Read Instructions before completing this form

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	30 Day Ave (mg/l)	7 Day Ave (mg/l)	30 Day Ave (lb/day)	UNIT			
Flow: Influent	SAMPLE MEASUREMENT	Please see attached Table 1a and 1b			MGD	----	----	----	0	Monthly	Flow Meter
	PERMIT REQUIREMENT	Monitor and Report				----	----	----			
Leak Detection Information	SAMPLE MEASUREMENT	Please see attached Table 2a and 2b			gallons	----	----	----	0	Bi-Monthly	Discrete-Field Measurement
	PERMIT REQUIREMENT	Monitor and Report				----	----	----			
Pond Water Level	SAMPLE MEASUREMENT	Please see attached Table 1a and 1b			feet	----	----	----	0	Bi-Monthly	Discrete-Field Measurement
	PERMIT REQUIREMENT	Monitor and Report				----	----	----			
Storage Volume	SAMPLE MEASUREMENT	Please see attached Table 1a and 1b			gallons	----	----	----	0	Bi-Monthly	Calculation
	PERMIT REQUIREMENT	-----	GW-11: 76,100,000 AP-5: 1,817,000			----	----	----			
Discharge to FBR	SAMPLE MEASUREMENT	Please see attached Table 1a and 1b			gallons	----	----	----	0	Bi-Monthly	Flow Meter
	PERMIT REQUIREMENT	Monitor and Report				----	----	----			
Water Balance Information	SAMPLE MEASUREMENT	Please see attached Table 1a and 1b			gallons	----	----	----	0	Monthly	Calculation
	PERMIT REQUIREMENT	Monitor and Report				----	----	----			
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER Kyle Hansen CEM 2167, exp 9-18-16 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 IMPRISONMENT FOR KNOWING VIOLATIONS.		TELEPHONE		DATE		
			702-966-8340	15	04	27	
		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO	DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here):

Ponds GW-11 and AP-5

PERMITTEE NAME/ADDRESS
NAME: Nevada Environmental Response Trust
ADDRESS: c/o Envirogen Technologies
 510 Fourth Street
 Henderson, NV 89015

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)


NEV2001515	001
PERMIT NUMBER	DISCHARGE NUMBER


FACILITY: Nevada Environmental Response Trust
LOCATION: Henderson, NV
ATTN: Kyle Hansen

MONITORING PERIOD							
FROM:	15	02	01	TO:	15	02	28

NO DISCHARGE: X

NOTE: Read Instructions before completing this form

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	30 Day Ave (mg/l)	7 Day Ave (mg/l)	30 Day Ave (lb/day)	UNIT			
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	PERMIT REQUIREMENT	Monitor and Report				----	----	----			
Storage Volume	SAMPLE MEASUREMENT	Please see attached Table 1a and 1b			gallons	----	----	----	0	Bi-Monthly	Calculation
	PERMIT REQUIREMENT	-----	GW-11: 76,100,000 AP-5: 1,817,000			----	----	----			
Discharge to FBR	SAMPLE MEASUREMENT	Please see attached Table 1a and 1b			gallons	----	----	----	0	Bi-Monthly	Flow Meter
	PERMIT REQUIREMENT	Monitor and Report				----	----	----			
Water Balance Information	SAMPLE MEASUREMENT	Please see attached Table 1a and 1b			gallons	----	----	----	0	Monthly	Calculation
	PERMIT REQUIREMENT	Monitor and Report				----	----	----			
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

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			702-966-8340	15	04	27	
		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO	DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here):

Ponds GW-11 and AP-5

PERMITTEE NAME/ADDRESS
NAME: Nevada Environmental Response Trust
ADDRESS: c/o Envirogen Technologies
 510 Fourth Street
 Henderson, NV 89015

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)


NEV2001515	001
PERMIT NUMBER	DISCHARGE NUMBER


FACILITY: Nevada Environmental Response Trust
LOCATION: Henderson, NV
ATTN: Kyle Hansen

MONITORING PERIOD							
FROM:	15	03	01	TO:	15	03	31

NO DISCHARGE: X

NOTE: Read Instructions before completing this form

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
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	PERMIT REQUIREMENT	Monitor and Report				----	----	----			
Water Balance Information	SAMPLE MEASUREMENT	Please see attached Table 1a and 1b			gallons	----	----	----	0	Monthly	Calculation
	PERMIT REQUIREMENT	Monitor and Report				----	----	----			
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

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			702-966-8340	15	04	27	
		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO	DAY

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here):

Ponds GW-11 and AP-5

ATTACHMENT 2

Pond Monitoring Results



GW-11 Pond
Volume Model Versi



GW-11 & AP-5
Record of Inspection

GW-11 & AP-5 Pond Data



GWETS Field
Sheet_4-1-2015_Tt Q

GW-11 Water Balance

Pond Monitoring Results

Table 1a – GW-11 Pond Level and Storage Volume

Date	Flow Into GW-11 (MGD)	Pond Water Level (vertical depth in feet)	Storage Volume (thousand gallons)	Discharge to FBRs (million gallons)	Water Balance (million gallons)
1-19-15	1.25	13.6	47,432	10.98 (01/1/15 - 01/15/15)	0.06
1-30-15		13.6	47,489	18.58 (01/15/15 - 01/31/15)	
2-11-15	1.45	13.8	48,286	13.56 (02/1/15 - 02/15/15)	1.14
2-26-15		14.1	49,427	19.98 (02/15/15 - 02/28/15)	
3-14-15	1.42	14.2	49,772	18.36 (03/1/15 - 03/15/15)	-0.17
3-26-15		14.1	49,599	22.59 (03/15/15 - 03/31/15)	

Notes:

MGD = million gallons per day

(1) The reported January and February flows into GW-11 are not sufficient to account for the increase in pond volume during that month. ETI indicated that the equalization tanks (TK-101 tanks) that regulate the flow of water to the FBR treatment plant from on-site and off-site well fields may have backflowed into GW-11 in January and February, which may have caused the increase in the pond volume.

Note: During 3rd quarter 2013, ENVIRON reviewed the volume calculations for GW-11 to verify its storage volume. Table 1 of the Permit, "Holding Pond Limitations for AP-5 and GW-11," indicates that the maximum storage volume of GW-11 is 70,000,000 gallons; however, ENVIRON determined that the maximum storage volume is approximately 76,100,000 gallons. In a letter to NDEP on September 12, 2013, ENVIRON requested a minor modification of the Permit to reflect the revised GW-11 maximum storage volume. In a letter dated October 7, 2013, NDEP concurred with the maximum volume of 76,100,000 gallons at zero feet of freeboard and indicated that the maximum volume corresponds to an operating volume of 62,400,000 gallons at 3.0 feet of freeboard. The Permit modification associated with the work at AP-5 will include the revised GW-11 volume calculations.



Table 1b – AP-5 Pond Monitoring Information

Date	Flow Into Pond ⁽¹⁾ (MGD)	Pond Level ⁽²⁾ (vertical depth in feet and inches)	Storage Volume (thousand gallons)	Discharge to FBRs (gallons)	Water Balance (million gallons)
01-16-15	--	3'7"	301.6	0	0.20
01-30-15		4'11"	504.0	0	
02-11-15	--	4'10"	490.8	0	-0.01
02-20-15		4'10"	490.8	0	
03-14-15	--	4'7"	451.1	0	-0.08
03-27-15		4'4"	413.0	0	

Notes:

⁽¹⁾ The AP-5 pond is in the process of being decommissioned. There is no routine flow into or out of AP-5. In 1st quarter 2015, no water was added to AP-5, except rainfall. The flow into AP-5 has been expressed as a rate, per the requirements of Table 1 of the Permit.

⁽²⁾ Depth is measured from the top of the standing pond water to the liner below the accumulated solids.



Table 2a – GW-11 Pond Leak Detection Monitoring

Date	Volume in Detection Wells (gallons)
1-16-15	NW – 1920
“	NE – 830
“	SW – Dry
“	SE – Dry
1-30-15	NW – 1575
“	NE – 2930
“	SW – Dry
“	SE – 3000
2-11-15	NW – 235
“	NE – 2915
“	SW – 50
“	SE – 1540
2-26-15	NW – 588
“	NE – 2799
“	SW – 305
“	SE – 207
3-14-15	NW – 375
“	NE – 1340
“	SW – 450
“	SE – 750
3-26-15	NW – 1560
“	NE – 5640
“	SW – 600
“	SE – 150



Table 2b – AP-5 Pond Leak Detection Monitoring

Date	Volume in Detection Well (gallons)
1-07-15	75
1-21-15	65
2-04-15	100¹
2-18-15	100¹
3-04-15	100¹
3-18-15	100¹

¹ During the leak detection measurement, some amount of liquid remained in the vault after the removal of 100 gallons.



ATTACHMENT 3

Updated CEM Designation Letter



OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE

**Le Petomane XXVII, Inc., Not Individually, But Solely as the Nevada Environmental Response Trust Trustee
35 East Wacker Drive - Suite 1550
Chicago, Illinois 60611
Tel: (312)498-2800**

April 27, 2015

Compliance Coordinator
Nevada Division of Environmental Protection
Bureau of Water Pollution Control
2030 E. Flamingo Rd, Suite 230
Las Vegas NV 89119

**RE: Letter of Authorization and Change of CEM Designation
Groundwater Discharge Permit #NEV2001515**

Dear Compliance Coordinator:

The Nevada Environmental Response Trust (the "Trust") maintains Groundwater Discharge Permit #NEV2001515 which regulates the synthetically double-lined ponds GW-11 and AP-5.

This letter serves as a written Letter of Authorization to authorize Tetra Tech, Inc. as the Trust's consultant and authorized representative, to submit and sign monitoring reports and other submittals associated with the subject Groundwater Discharge Permit on behalf of the Trust.

This letter also serves as the written Change of Certified Environmental Manager (CEM) Designation from Kimberly Kuwabara (Nevada CEM 2353, exp. 3/20/2017) and John Pekala (Nevada CEM 2347, exp. 9/20/2016) of ENVIRON International Corporation, to Kyle Hansen (Nevada CEM 2167, exp. 9/18/2016) of Tetra Tech, Inc., as the primary CEM.

Please feel free to contact the undersigned at (312) 498-2800 or andrew.steinberg@lepetomaneinc.com if you have any questions regarding this letter.

Office of the Nevada Environmental Response Trust

By: 

Andrew W. Steinberg, not individually but solely as Vice-President of Operations for Le Petomane, Inc., not individually but solely as Agent of the Nevada Environmental Response Trust.

cc: Jay Steinberg, as President of the Nevada Environmental Response Trust Trustee and not individually
Steven Clough, Nevada Environmental Response Trust
Greg Lovato, NDEP Bureau of Corrective Actions
James Dotchin, NDEP Bureau of Corrective Actions
Weiquan Dong, NDEP Bureau of Corrective Actions
Nikita Lingenfelter, NDEP Bureau of Water Pollution Control
John Pekala, ENVIRON International Corp.
Tanya C. O'Neill, Foley & Lardner LLP
Michael Delvecchio, ETI