TETRA TECH

January 26, 2016

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

Subject: Groundwater Discharge Permit NEV2001515
Discharge Monitoring Report - 4th Quarter 2015

Dear Compliance Coordinator:

The Nevada Environmental Response Trust (NERT or Trust) maintains Groundwater Discharge Permit #NEV2001515 (Permit), which covers the synthetically double-lined ponds GW-11 and AP-5 at the NERT site in Henderson, Nevada. During 4th quarter 2015, no water was discharged directly to a receiving water body from either GW-11 or AP-5. Treated water from the perchlorate treatment system at the NERT site is discharged to Las Vegas Wash pursuant to NPDES Permit #NV0023060. A groundwater extraction and treatment system (GWETS) at the NERT site is operated by Envirogen Technologies Inc. (ETI).

AP-5

The Trust is in the process of decommissioning the AP-5 pond. Activities related to decommissioning are overseen by the Nevada Division of Environmental Protection (NDEP), Bureau of Industrial Site Cleanup. In the interim, water is periodically added to keep the pond solids moist (Table 1b).

No leakage rate testing in the leak detection sump was conducted during the 4th quarter 2015. NERT temporarily suspended leakage rate testing in the leak detection sump while a new pump was installed, as initially documented in a letter from the Trust to the NDEP Bureau of Water Pollution Control, dated July 24, 2015. Leakage rate testing will resume using the new pump and an associated standard operating procedure, anticipated to occur in January 2016. NERT also suspended access on the pond liner due to potential safety concerns. Pond water level measurements, therefore, were not conducted during November and December 2015.

GW-11

Liquid was detected in three of four GW-11 corner leak detection wells during the 4th quarter 2015. The northeast corner well detected no leakage during the quarter. Currently, pumps do not reach the bottom of the northeast and southeast detection wells. Tetra Tech, Inc. evaluated alternatives to correct deficiencies in the wells with a procedure to repair the northeast riser pipe, reinforce the riser pipes in each of the other corners of GW-11, and re-position the northeast and southeast pumps. The Trust is in discussion with ETI to implement the proposed repairs.

Tetra Tech
1489 W Warm Springs Road, Suite 110, Henderson, NV 89014
Tel 702.966.8340 www. tetratech.com

Attachment 1 provides October, November, and December 2015 Discharge Monitoring Reports (DMRs). Attachment 2 provides pond monitoring tables with water balance and leak detection monitoring information.

Photos

Section I.B.2.a of the groundwater permit requires the permittee to submit labeled and dated photographs of the holding ponds together with the 4th quarter DMR. Attachment 3 provides photos of AP-5 and GW-11 obtained on October 27, 2015.

5-year Plot

Section I.B.2.a of the groundwater permit requires the permittee to submit a plot of monitoring parameters versus date for each quarterly monitoring parameter for the preceding 5 years. Attachment 4 provides plots of 5-year data for influent, pond water levels, storage volumes, discharge to the FBR, and water balance.

Please contact me at (702) 966-8340 or kyle.hansen@tetratech.com for any questions regarding this report.

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

cc: Greg Lovato, Bureau of Corrective Actions, NDEP
James Dotchin, Bureau of Corrective Actions, NDEP
Weiquan Dong, Bureau of Corrective Actions, NDEP
Nikita Lingenfelter, Bureau of Water Pollution Control, 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, Ramboll Environ
John Pekala, Ramboll Environ
Frank Johns, Tetra Tech, Inc.
Derek Amidon, Tetra Tech, Inc.

Discharge Permit NEV2001515 – 4th Quarter 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

October 2015

November 2015

December 2015

PERMITTEE NAME/ADDRESS:

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

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

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM ***(NPDES)***

DISCHARGE MONITORING REPORT *(DMR)*

NEV2001515	001
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD

FROM: 15 | 10 | 01 TO: 15 | 10 | 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	See attached Tables 1a and b		MGD	--------	---------	--------		0	Monthly	Flow Meter
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-------				
Leak Detection Information	SAMPLE MEASUREMENT	See attached Tables 2a and b		gallons	--------	---------	--------		0	Bi-Monthly	**Discrete-Field Measurement**
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Pond Water Level	SAMPLE MEASUREMENT	See attached Tables 1a and b		feet	--------	---------	--------		0	Bi-Monthly	**Discrete-Field Measurement**
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Storage Volume	SAMPLE MEASUREMENT	See attached Tables 1a and b		gallons	--------	---------	--------		0	Bi-Monthly	**Calculation**
	PERMIT REQUIREMENT	-----	GW-11: 76,100,000 AP-5: 1,817,000		-----	-----					
Discharge to FBR	SAMPLE MEASUREMENT	See attached Tables 1a and b		gallons	--------	---------	--------		0	Bi-Monthly	**Flow Meter**
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Water Balance Information	SAMPLE MEASUREMENT	See attached Tables 1a and b		gallons	--------	---------	--------		0	Monthly	**Calculation**
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME / TITLE PRINCIPAL EXECUTIVE OFFICER		TELEPHONE	DATE
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.	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	702-966-8340 AREA CODE NUMBER	16| 01 | 26 YEAR MO DAY

Forms by WindowChem(707)864-0845;p/n11090;v5.01;4/1/96

COMMENT 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

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

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM ***(NPDES)***

DISCHARGE MONITORING REPORT *(DMR)*

NEV2001515	001
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD

FROM: 15 | 11 | 01 TO: 15 | 11 | 30

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	See attached Tables 1a and b		MGD	--------	---------	--------		0	Monthly	Flow Meter
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-------				
Leak Detection Information	SAMPLE MEASUREMENT	See attached Tables 2a and b		gallons	--------	---------	--------		0	Bi-Monthly	**Discrete-Field Measurement**
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Pond Water Level	SAMPLE MEASUREMENT	See attached Tables 1a and b		feet	--------	---------	--------		0	Bi-Monthly	**Discrete-Field Measurement**
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Storage Volume	SAMPLE MEASUREMENT	See attached Tables 1a and b		gallons	--------	---------	--------		0	Bi-Monthly	**Calculation**
	PERMIT REQUIREMENT	-----	GW-11: 76,100,000 AP-5: 1,817,000		-----	-----					
Discharge to FBR	SAMPLE MEASUREMENT	See attached Tables 1a and b		gallons	--------	---------	--------		0	Bi-Monthly	**Flow Meter**
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Water Balance Information	SAMPLE MEASUREMENT	See attached Tables 1a and b		gallons	--------	---------	--------		0	Monthly	**Calculation**
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME / TITLE PRINCIPAL EXECUTIVE OFFICER			TELEPHONE	DATE
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Forms by WindowChem(707)864-0845;p/n11090;v5.01;4/1/96

COMMENT 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

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

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM ***(NPDES)***

DISCHARGE MONITORING REPORT *(DMR)*

NEV2001515	001
PERMIT NUMBER	DISCHARGE NUMBER

MONITORING PERIOD

FROM: 15 | 12 | 01 TO: 15 | 12 | 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	See attached Tables 1a and b		MGD	--------	---------	--------		0	Monthly	Flow Meter
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-------				
Leak Detection Information	SAMPLE MEASUREMENT	See attached Tables 2a and b		gallons	--------	---------	--------		0	Bi-Monthly	**Discrete-Field Measurement**
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Pond Water Level	SAMPLE MEASUREMENT	See attached Tables 1a and b		feet	--------	---------	--------		0	Bi-Monthly	**Discrete-Field Measurement**
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Storage Volume	SAMPLE MEASUREMENT	See attached Tables 1a and b		gallons	--------	---------	--------		0	Bi-Monthly	**Calculation**
	PERMIT REQUIREMENT	-----	GW-11: 76,100,000 AP-5: 1,817,000		-----	-----					
Discharge to FBR	SAMPLE MEASUREMENT	See attached Tables 1a and b		gallons	--------	---------	--------		0	Bi-Monthly	**Flow Meter**
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Water Balance Information	SAMPLE MEASUREMENT	See attached Tables 1a and b		gallons	--------	---------	--------		0	Monthly	**Calculation**
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME / TITLE PRINCIPAL EXECUTIVE OFFICER		TELEPHONE	DATE
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Forms by WindowChem(707)864-0845;p/n11090;v5.01;4/1/96

COMMENT AND EXPLANATION OF ANY VIOLATIONS ***(Reference all attachments here)***

Ponds GW-11 and AP-5

ATTACHMENT 2

Pond Monitoring Results

4th Quarter 2015

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)
10/6/15	1.09	13.0	44,678	10.32 (010/1/15 - 10/16/15)	-0.3
10/23/15		12.8	44,020	19.39 (10/16/15 - 10/31/15)	
11/3/15	1.35	12.6	43,216	19.22 (11/1/15 - 11/15/15)	-1.2
11/25/15		12.6	43,105	19.84 (11/15/15 - 11/30/15)	
12/8/15	1.12	12.6	43,216	15.20 (12/1/15 - 12/16/15)	0.2
12/20/15		12.7	43,439	18.71 (12/16/15 - 12/31/15)	
MGD = million gallons per day					

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)
10/13/15	0.015	4'2"	382.9	0	-0.31
10/27/15		4'4"	413.0	0	
11/2015	0.004	NA[3]	NA[3]	0	0.05
		NA[3]	NA[3]	0	
12/2015	0.001	NA[3]	NA[3]	0	-0.01
		NA[3]	NA[3]	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 except to keep the solids moist. The flow into AP-5 has been expressed as a rate, per the requirements of Table 1 of the permit.

[2]The depth includes pond solids and added water.

[3] October 27, 2015 was the last volume measurement collected in 2015 due to potential safety concerns related to access on the pond liners.

Table 2a – GW-11 Pond Leak Detection Monitoring

Dates[1]	Volume in Detection Wells (gallons)
10/13/15 – 10/15/15	NW – 0
"	NE – 0
"	SW – 623
"	SE – 155
10/27/15 – 10/29/15	NW – 0
"	NE – 0
"	SW – 0
"	SE – 0
11/11/15 – 11/13/15	NW – 0
"	NE – 0
"	SW – 266
"	SE – 0
11/23/15 – 11/25/15	NW – 5
"	NE – 0
"	SW – 1159
"	SE – 0
12/9/15 – 12/11/15	NW – 0
"	NE – 0
"	SW – 250
"	SE – 0
12/29/15 – 12/31/15	NW – 0
"	NE – 0
"	SW – 582
"	SE – 0

[1]Twice monthly pumping activities each occur over a 3-day period to evaluate the leakage rates in GW-11, in accordance with procedures specified in a letter to NDEP-BWPC, dated May 28, 2015. The procedure is comprised of: days 1 and 2 consist of pumping the well content dry. Day 3 provides the monitoring day for the gallons per day recharge rate. The value reported here represents the cumulative volume pumped during all 3 days. During the reporting period, the leakage rate did not exceed 125 gallons/acre-day.

Table 2b – AP-5 Pond Leak Detection Monitoring

Date	Volume in Detection Well (gallons)
NA[1]	NA[1]
NA[1]	NA[1]
NA[1]	NA[1]
NA[1]	NA[1]
NA[1]	NA[1]
NA[1]	NA[1]

[1]No leakage rate testing in the leak detection sump was conducted during the 4th quarter 2015. NERT temporarily suspended leakage rate testing in the leak detection sump while a new pump was installed, as initially documented in a letter from the Trust to the NDEP Bureau of Water Pollution Control, dated July 24, 2015.

ATTACHMENT 3

Photos

GW-11 and AP-5

2015

Figure 1. GW-11 Pond (October 27, 2015)

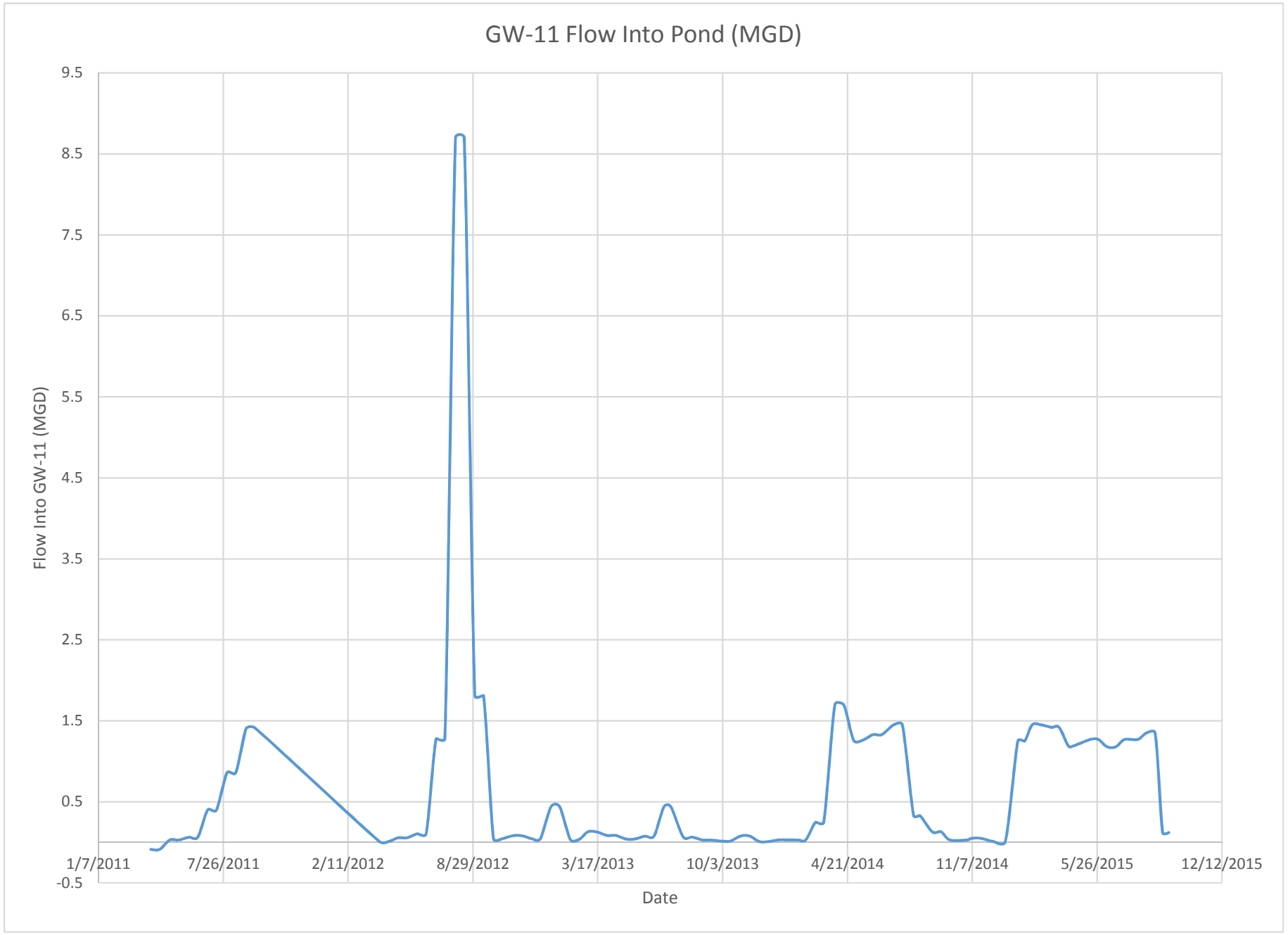
Figure 2. AP-5 Pond (October 27, 2015)

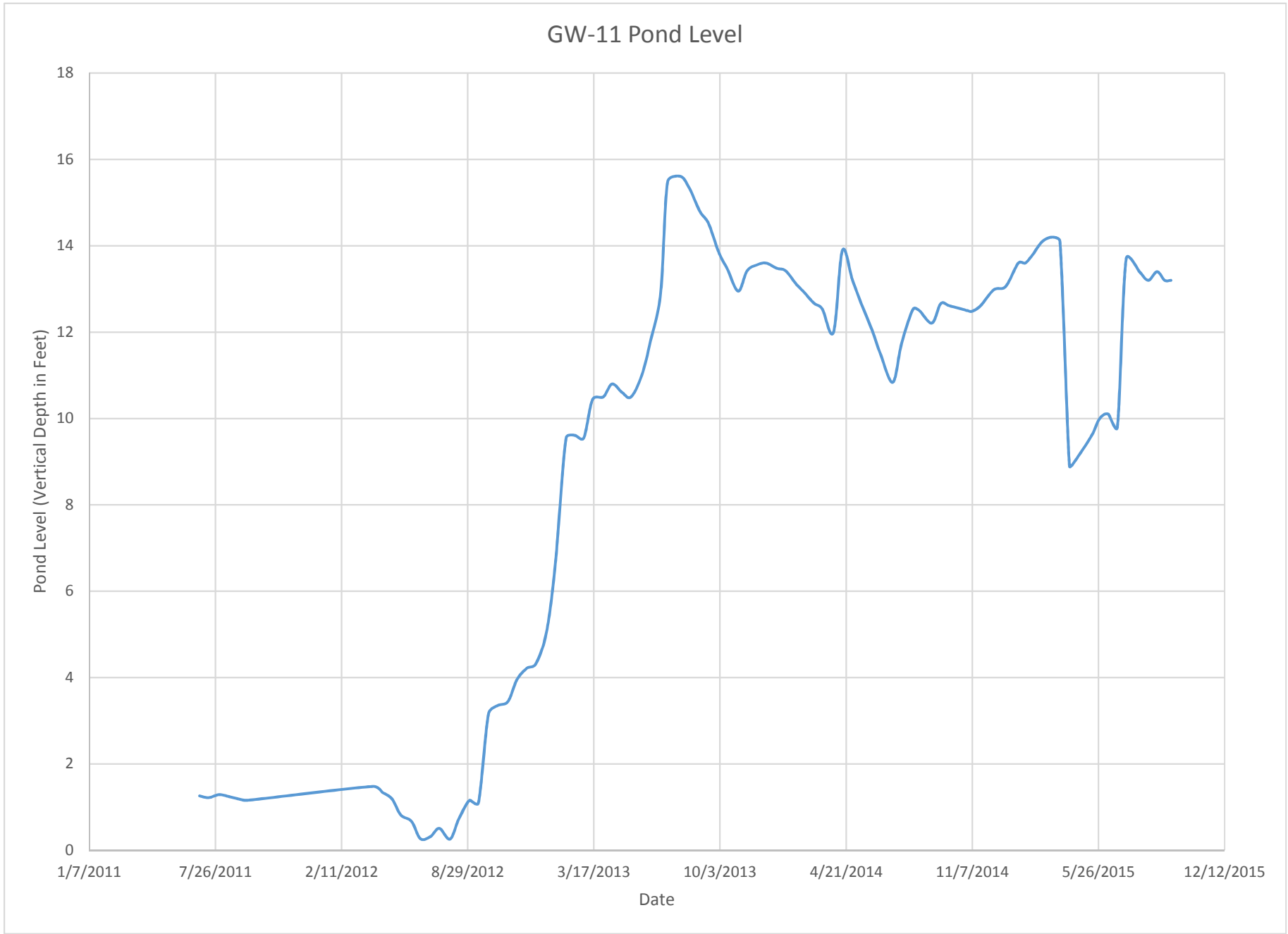
ATTACHMENT 4

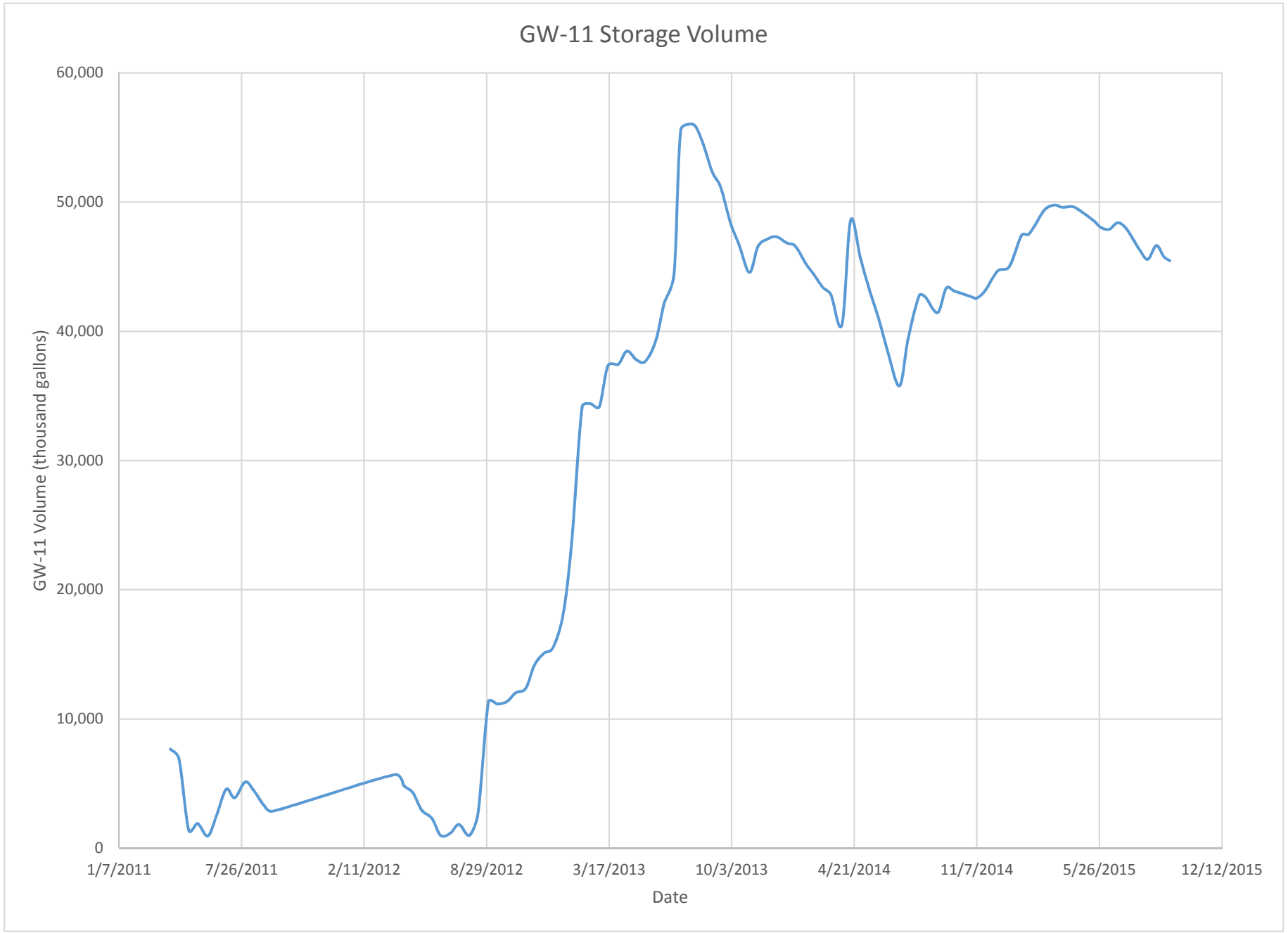
5-Year Plots

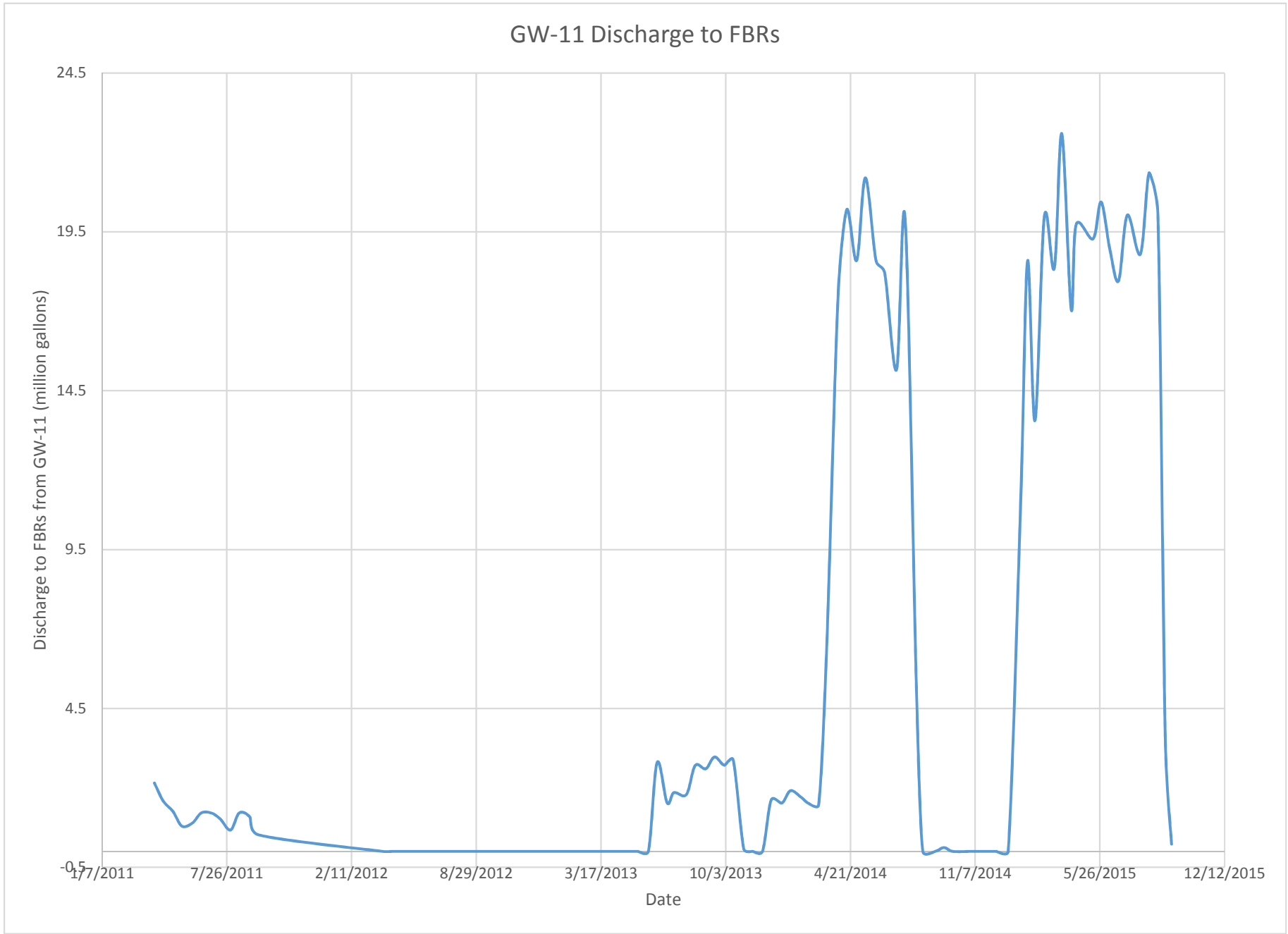
Pond Monitoring Data

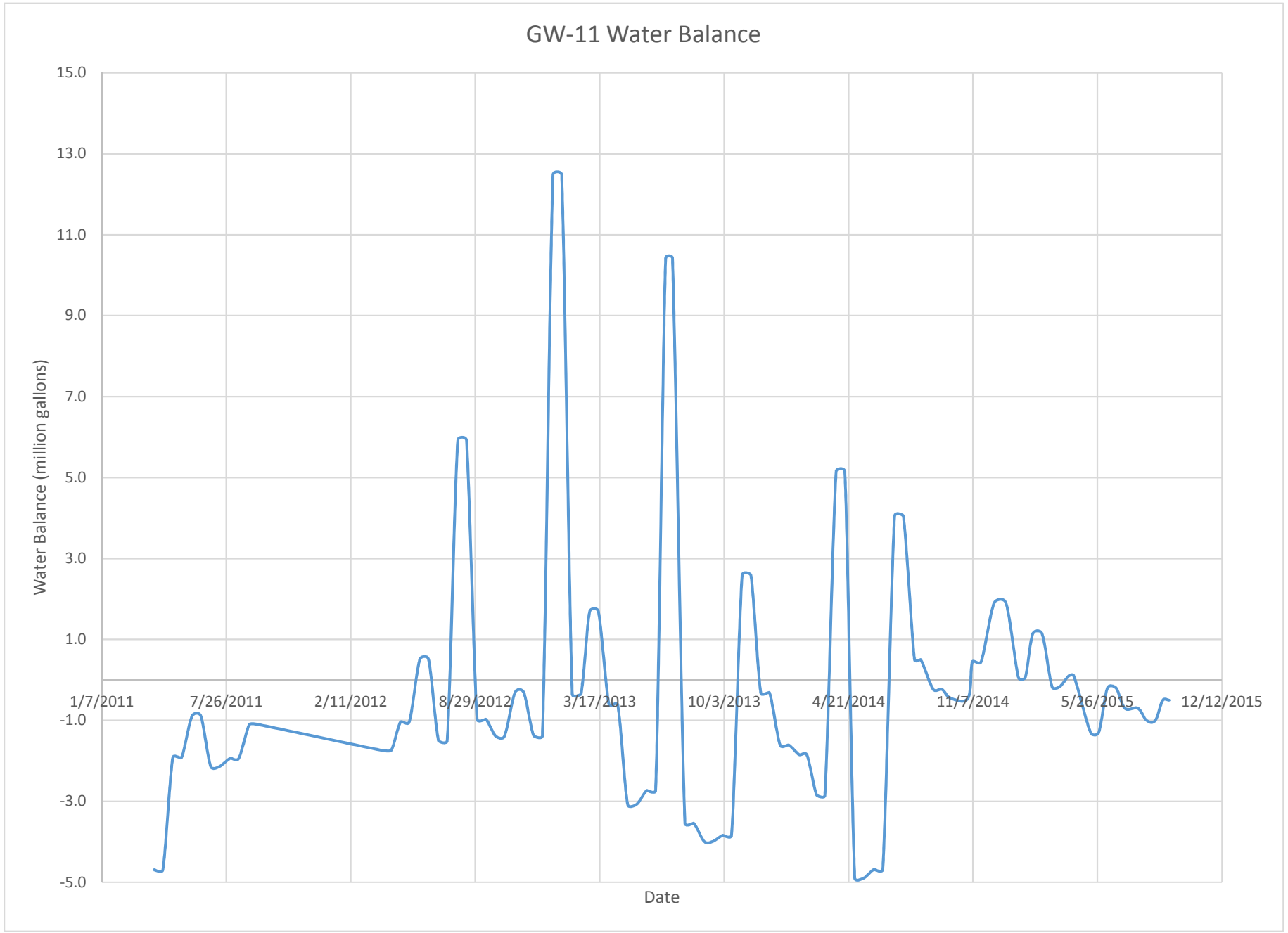
January 2011 – December 2015

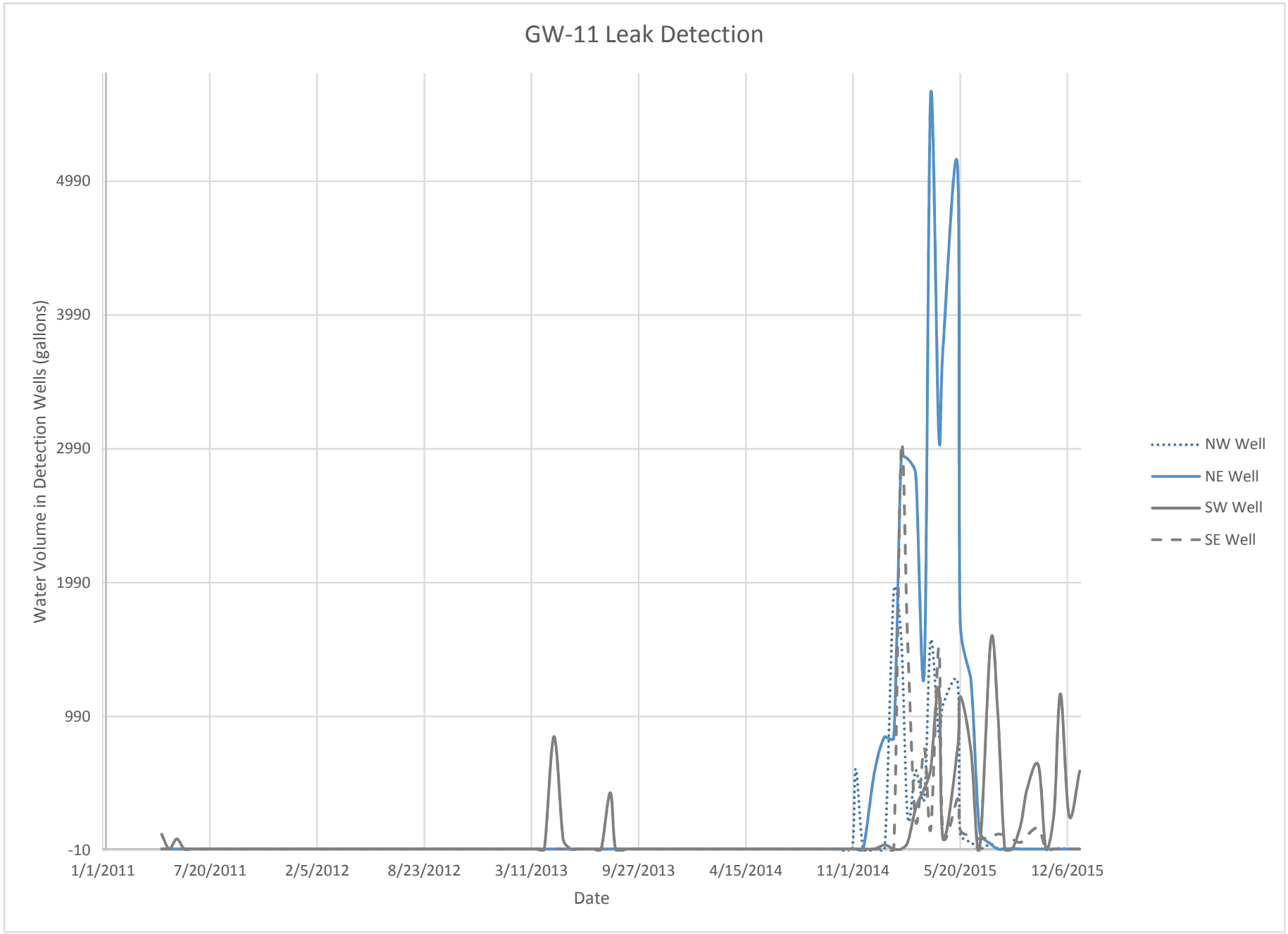

GW-11 Flow Into Pond (MGD)
Flow Into GW-11 (MGD)
9.5
8.5
7.5
6.5
5.5
4.5
3.5
2.5
1.5
0.5
-0.5
1/7/2011
7/26/2011
2/11/2012
8/29/2012
3/17/2013
10/3/2013
4/21/2014
11/7/2014
5/26/2015
12/12/2015
Date

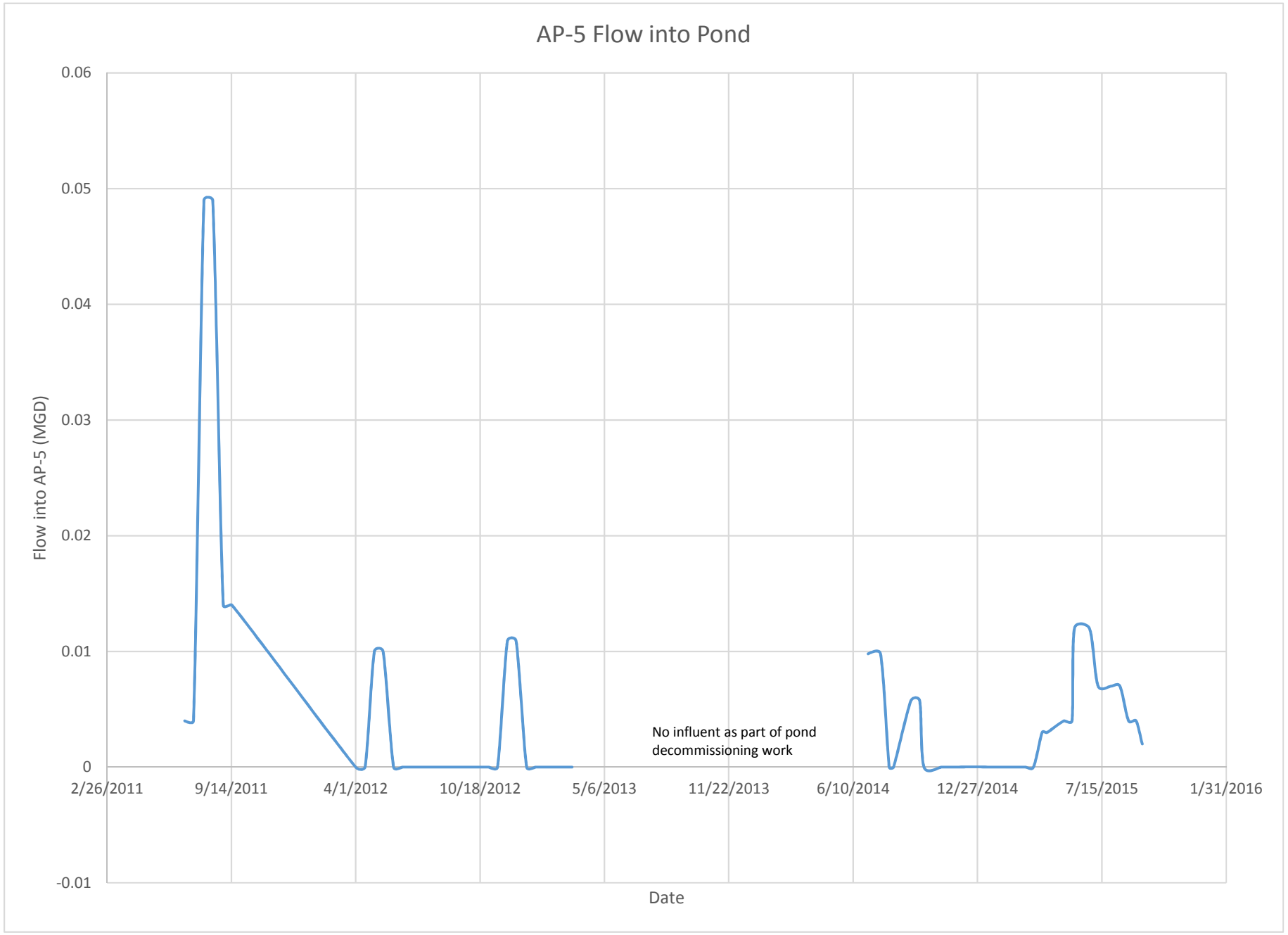

GW-11 Pond Level
Pond Level (Vertical Depth in Feet)
18
16
14
12
10
8
6
4
2
0
1/7/2011
7/26/2011
2/11/2012
8/29/2012
3/17/2013
10/3/2013
4/21/2014
11/7/2014
5/26/2015
12/12/2015
Date

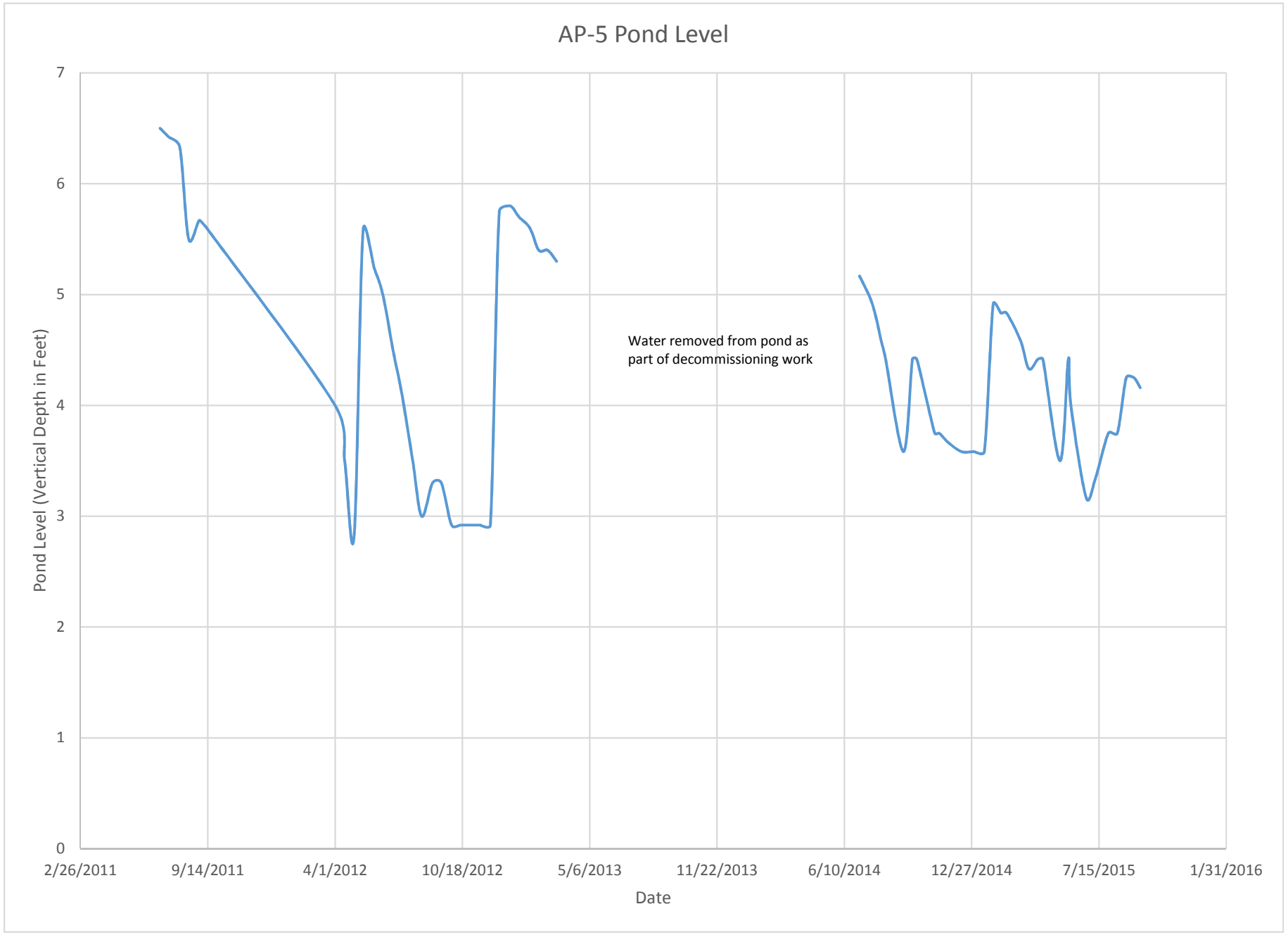

GW-11 Storage Volume
60,000
50,000
40,000
30,000
20,000
10,000
0
GW-11 Volume (thousand gallons)
1/7/2011
7/26/2011
2/11/2012
8/29/2012
3/17/2013
10/3/2013
4/21/2014
11/7/2014
5/26/2015
12/12/2015
Date

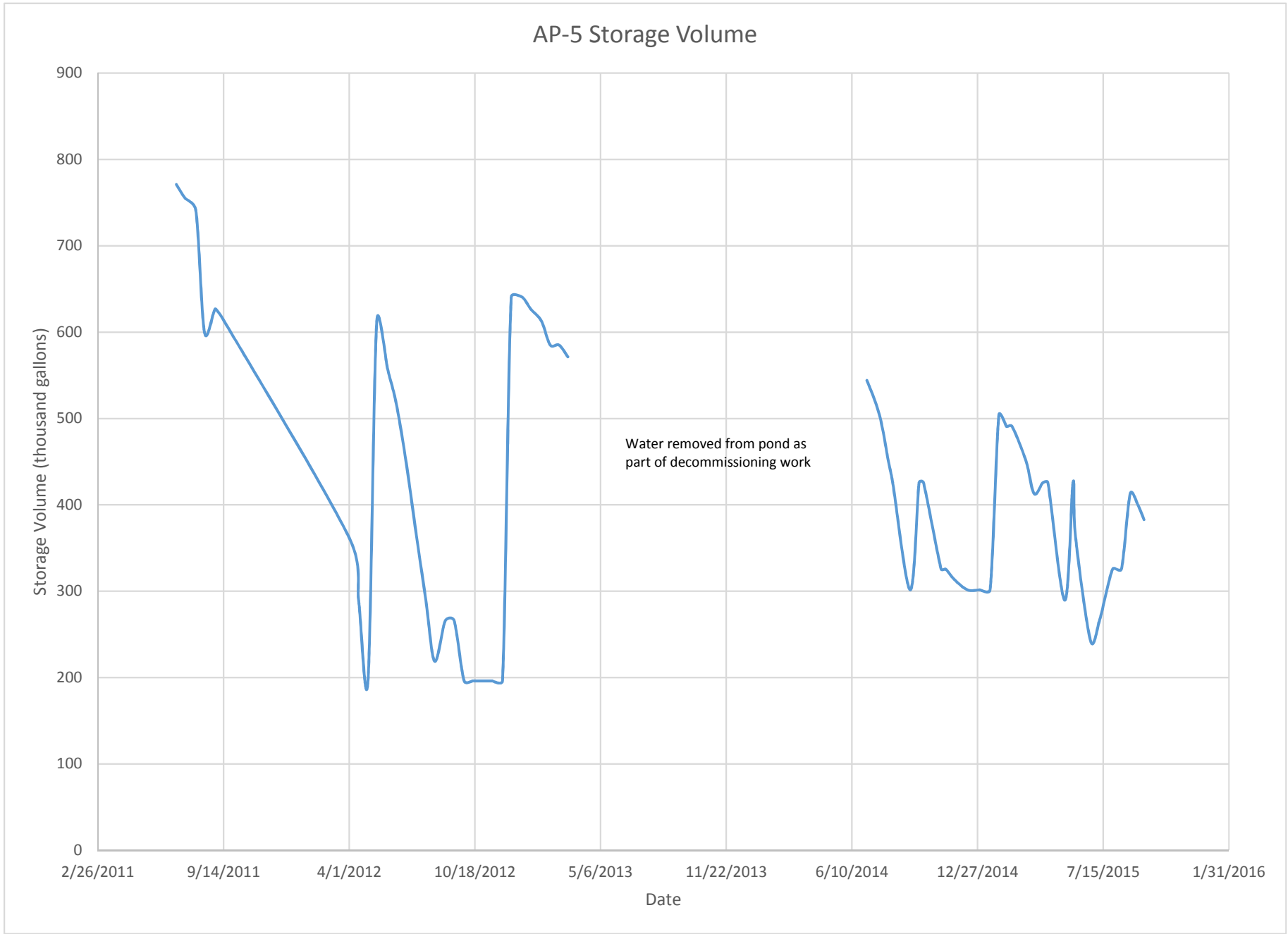

GW-11 Discharge to FBRs
Discharge to FBRs from GW-11 (million gallons)
24.5
19.5
14.5
9.5
4.5
-0.5
1/7/2011
7/26/2011
2/11/2012
8/29/2012
3/17/2013
10/3/2013
4/21/2014
11/7/2014
5/26/2015
12/12/2015
Date

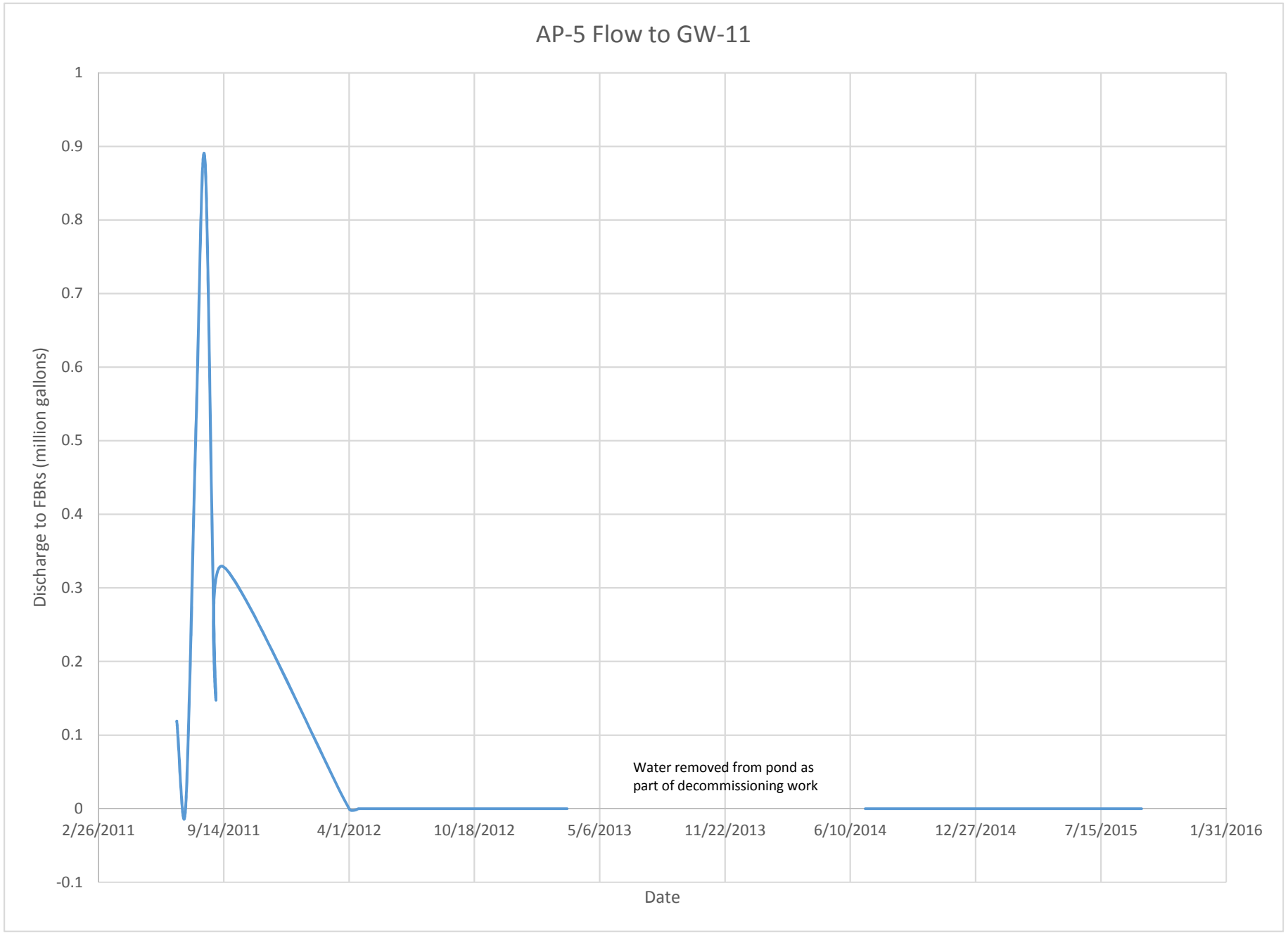

GW-11 Water Balance
15.0
13.0
11.0
9.0
7.0
5.0
3.0
1.0
-1.0
-3.0
-5.0
Water Balance (million gallons)
1/7/2011
7/26/2011
2/11/2012
8/29/2012
3/17/2013
10/3/2013
4/21/2014
11/7/2014
5/26/2015
12/12/2015
Date

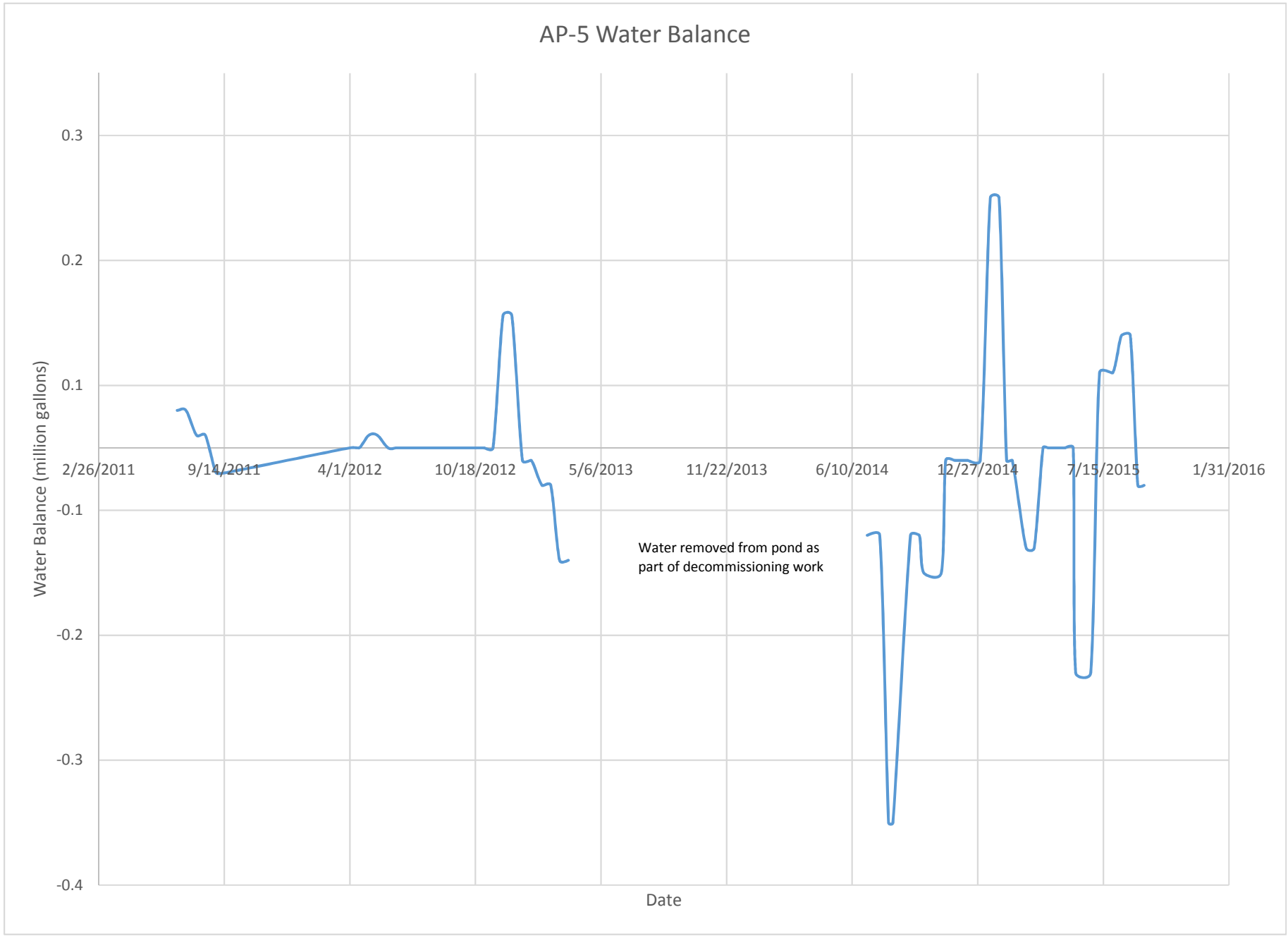

GW-11 Leak Detection
Water Volume in Detection Wells (gallons)
4990
3990
2990
1990
990
-10
1/1/2011
7/20/2011
2/5/2012
8/23/2012
3/11/2013
9/27/2013
4/15/2014
11/1/2014
5/20/2015
12/6/2015
Date
NW Well
NE Well
SW Well
SE Well

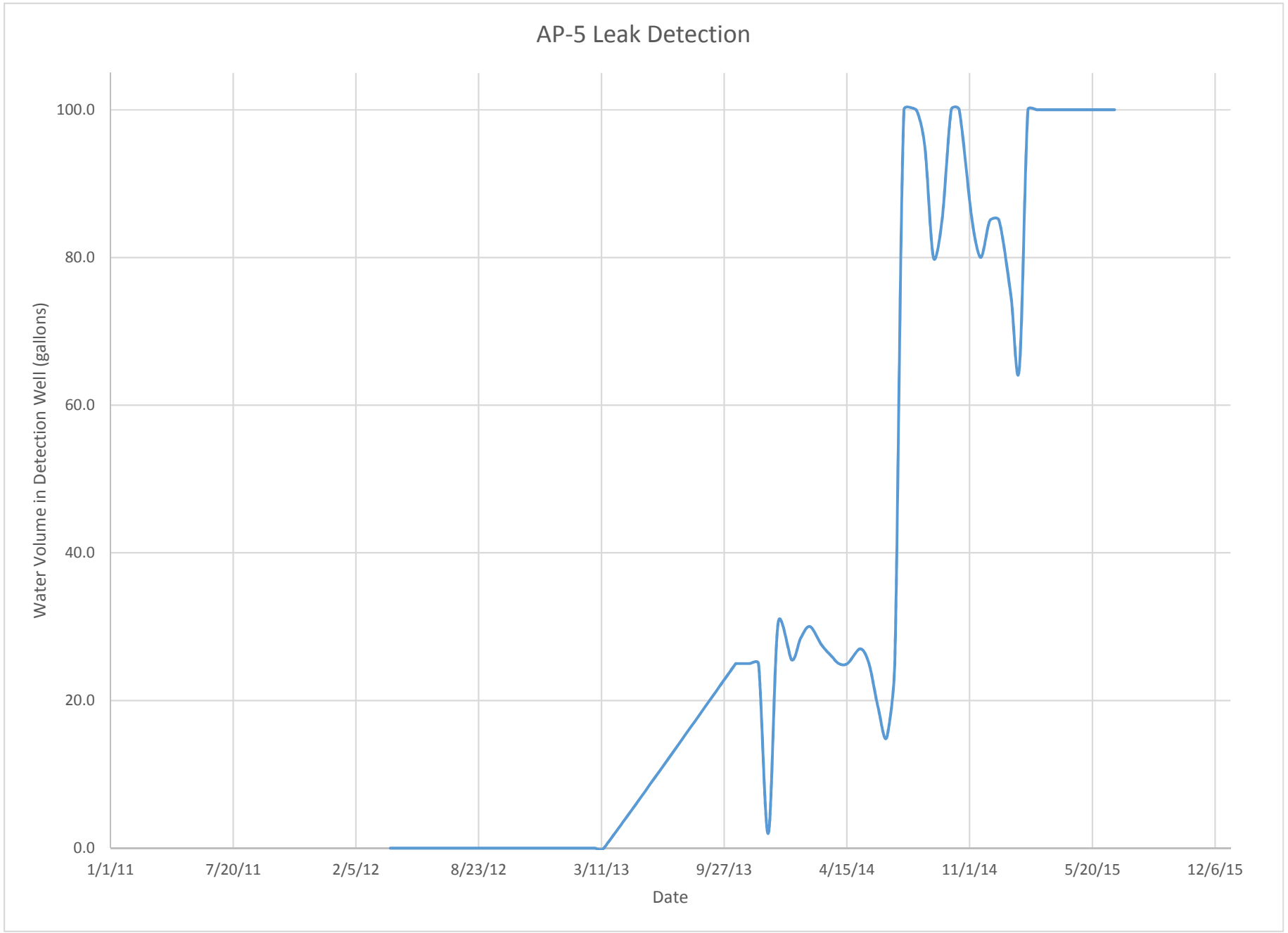

AP-5 Flow into Pond
Flow into AP-5 (MGD)
0.06
0.05
0.04
0.03
0.02
0.01
0
-0.01
2/26/2011
9/14/2011
4/1/2012
10/18/2012
5/6/2013
11/22/2013
6/10/2014
12/27/2014
7/15/2015
1/31/2016
Date
No influent as part of pond decommissioning work


AP-5 Pond Level
Pond Level (Vertical Depth in Feet)
7
6
5
4
3
2
1
0
2/26/2011
9/14/2011
4/1/2012
10/18/2012
5/6/2013
11/22/2013
6/10/2014
12/27/2014
7/15/2015
1/31/2016
Date
Water removed from pond as part of decommissioning work


AP-5 Storage Volume
Storage Volume (thousand gallons)
900
800
700
600
500
400
300
200
100
0
2/26/2011
9/14/2011
4/1/2012
10/18/2012
5/6/2013
11/22/2013
6/10/2014
12/27/2014
7/15/2015
1/31/2016
Date
Water removed from pond as part of decommissioning work


AP-5 Flow to GW-11
Discharge to FBRs (million gallons)
1
0.9
0.8
0.7
0.6
0.5
0.4
0.3
0.2
0.1
0
-0.1
2/26/2011
9/14/2011
4/1/2012
10/18/2012
5/6/2013
11/22/2013
6/10/2014
12/27/2014
7/15/2015
1/31/2016
Date
Water removed from pond as
part of decommissioning work


AP-5 Water Balance
Water Balance (million gallons)
0.3
0.2
0.1
-0.1
-0.2
-0.3
-0.4
2/26/2011
9/14/2011
4/1/2012
10/18/2012
5/6/2013
11/22/2013
6/10/2014
12/27/2014
7/15/2015
1/31/2016
Water removed from pond as part of decommissioning work
Date


AP-5 Leak Detection
Water Volume in Detection Well (gallons)
100.0
80.0
60.0
40.0
20.0
0.0
1/1/11
7/20/11
2/5/12
8/23/12
3/11/13
9/27/13
4/15/14
11/1/14
5/20/15
12/6/15
Date