

June 8, 2016

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

RE: Spill of un-treated water from Vertical Turbine pump at Lift Station 1 Incident No. 160603-01

Dear Compliance Coordinator:

The Nevada Environmental Response Trust ("NERT" or the "Trust") maintains a National Pollutant Discharge Elimination System (NPDES) Permit NV0023060 for the 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 NERT site in Henderson, Nevada (the "Site"). Envirogen Technologies, Inc. (Envirogen) is submitting this letter on behalf of the Trust to provide written documentation of a spill from the vertical turbine VT-100 pump packing stuffing box, at the north side of the wet well at Lift Station #1.

At 6:25 AM PDT on June 3rd, 2016, Envirogen personnel conducted normal routine inspection rounds at Lift Station #1 and the personnel documented in a logbook that the area was secure and no leaks were observed at the location. At approximately 8:45 AM PDT, Mr. Steve Clough of the Nevada Environmental Response Trust, was conducting his weekly inspections of the lift Stations and discovered a leak coming from the packing of the vertical turbine pump at Lift Station #1. By his estimation, approximately 0.25 gallons of untreated water ran off the concreate wet well cover. This style of a vertical turbine pump is designed with packing material to create a seal around the shaft. The seal must be lubricated which is accomplished by using the existing water that is being pumped. As this seal wears, it is possible for some slight leakage, which is what was seen on June 3.

The Pump was inspected on April 19th per the manufacturer's preventative maintenance (PM) schedule and no faults were found. The next PM inspection was scheduled to be performed later this month.

Immediately following the notification from Mr. Clough, Envirogen personnel rotated to a backup, alternate pump VT-101 to prevent further leakage to the ground until maintenance personnel could inspect and determine the corrective action. The pumps were switched at approximately 9:09 AM PDT.

Mr. Clough reported this incident via telephone at approximately 12:55 PM PDT on June 3rd, 2016, to the NDEP Spill Notification Line. This incident was assigned Spill Incident No. 160603-01. The NDEP Bureau of Industrial Site Cleanup was notified by email immediately following the call to the Spill Notification Line.

Please accept this as a written report required by Section II.A.3.b. of the NPDES permit.

i. <u>Time and date of discharge</u>

8:45 AM PDT on June 3rd, 2016.

ii. Exact location and estimated amount of discharge

- The Site is the Nevada Environmental Response Trust site, 510 South Fourth Street, Henderson, NV 89105. The Lift Station # 1 is located at 800 East "Athens Road Rd. Henderson NV 89011
- The amount of discharge is estimated to be approximately one quart (0.25 gallons) based on visual observation.

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

The untreated influent water that was discharged absorbed into the immediate ground next to the concrete wet well, but never reached any drainages or waterways.

iv. The specific cause of the discharge

The root cause of this incident was attributable to the following:

1. Worn packing or loose gland of the vertical turbine pump can cause seepage.

v. The preventive and/or corrective actions taken

In response to this spill and to minimize their reoccurrence, preventive measures that will be undertaken include:

- 1. Upon discovery of the issue, the alternate vertical turbine pump at Lift Station #1 was activated and the leaking pump shut down.
- 2. As a temporary measure, an HPDE plastic liner and sand bags have been placed along the North side of the concrete wet well pad as a containment mechanism to prevent dripping water being introduced to the local soil. ETI will evaluate and implement a permanent upgrade to the Lift Station containment structures within 30 days of this report.
- 3. The turbine pump VT-100 has been inspected and the packing has been replaced.

Please let me know if you have any questions. I can be reached at (619) 887-1385 or via email at twebster@envirogen.com.

Sincerely,

d S. Wetster

Todd S. Webster, Ph.D., P.E. Regional Vice President-West Envirogen Technologies, Inc.

Copies: Regional Administrator, USEPA Region 9

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