



October 19, 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: Report of Spill of Untreated Water from Lift Station Turbine Pump Seal Water Line at Lift Station 2
NPDES Permit NV0023060
Incident No. 161016-01

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 Lift Station Turbine Pump seal water line at Lift Station 2.

At 10:47 AM PDT on October 15th, 2016, while the Envirogen operator was conducting morning rounds to Lift Station 2, a leak of approximately 2.5 to 3 gpm was discovered coming from seal water line of the newly installed #1 Lift Station Turbine pump. The operator immediately shut down the #1 pump and started the #2 Lift Station Turbine pump. Envirogen immediately informed the Trust of the spill.

This pump had recently been installed as part of the Lift Station Upgrade program. The pump had been checked both at the factory, by startup/commissioning inspection upon installation at the Lift Station, and prior to its use.

Based upon available information, it is Envirogen's assumption that the pump most likely had a factory defect which could not have been determined prior to the failure.

The Trust reported this incident via telephone at approximately 8:38AM PDT on October 16th, 2016, to the NDEP Spill Notification Line. This incident was assigned Spill Incident No. 161016-01. The NDEP Bureau of Corrective Actions 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. Time and date of discharge

- 10:47 AM PDT on October 15th, 2016.

ii. Exact location and estimated amount of discharge

- The Site is the Nevada Environmental Response Trust Lift Station #2, 6542 Pabco Road, Henderson, NV 89011. The discharge occurred from the #1 Lift Station pump which is positioned on top of the wet well, and sprayed water onto the concrete cover of the wet well which

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subsequently flowed onto the adjacent soil. The concrete cover of the wet well also acts as a form of secondary containment and is approximately 27 feet by 27 feet in size. No water left the lift station; which is fully enclosed by a 6 foot wall.

- The amount of discharge is estimated to be less than 200 gallons based on visual observation.

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

- The untreated influent water that was discharged from the broken seal water line, flowed onto the concrete cover of the wet well and some then spilled onto the ground adjacent to the wet well. Water that spilled off the wet well to the adjacent ground was absorbed into the soil next to the concrete wet well within the Lift Station. No water reached any drainages or waterways and no water left the confines of the Lift Station. Based on visual observation, approximately 50 square feet was observed to be wet.

iv. The specific cause of the discharge

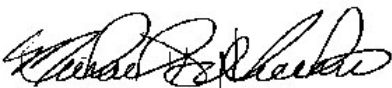
- The root cause of this incident was attributable to the following:
 1. ¼ inch compression fitting, as part of the pump, used for the discharge of pump seal water failed.
 2. The cause of the failure cannot be determined but the original tubing was tight and short in length. It is possible that the tubing was not completely seated in the fittings from the factory but this could not have been determined prior or subsequent to the failure.

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. Subsequent to the failure, all of the compression fittings and tubing for the pump seal water, which failed, were replaced and re-inspected. The replaced tubing was carefully placed to insure it was fully seated in the compression fittings.
 2. Pump was brought back online and the pump and seal water are functioning normally.
 3. ETI will be upgrading the concrete cover of the wet well with a concrete barrier/berm to prevent flow off the pad.

Please let me know if you have any questions. I can be reached at (908)963-0651 or via email at mdelvecchio@envirogen.com.

Sincerely,



Michael Del Vecchio
Director of Engineering and Project Management
Envirogen Technologies, Inc.

Copies: Regional Administrator, USEPA Region 9

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(electronic) Joe Maez, Bureau of Water Pollution Control, NDEP
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