

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 60601

Tel: (312)498-2800

December 8, 2016

Mr. Weiquan Dong, Ph.D.
Bureau of Industrial Site Cleanup
Nevada Division of Environmental Protection
2030 E. Flamingo Rd, Suite 230
Las Vegas NV 89119

RE: Corrective Action Plan – Lift Station 2
Nevada Environmental Response Trust
Henderson, Nevada

Dear Mr. Dong:

The Nevada Environmental Response Trust (NERT) is pleased to present this Corrective Action Plan for Lift Station 2 for Nevada Division of Environmental Protection (NDEP) review. This plan is being submitted as requested in your electronic mail dated October 25, 2016.

Background

On October 15, 2015 a spill at Lift Station 2 was discovered by Envirogen Technologies, Inc. (ETI) personnel at approximately 10:47 AM PST. Based on visual observations, NERT estimated that approximately 200 gallons of untreated groundwater was released to the containment pad and the ground surface. The spill was identified by ETI during their morning inspection of the lift stations and the leak was estimated at a rate of 2.5 to 3 gallons per minute. Based on ETI's observations and the current configuration of the containment pad, NERT estimates that approximately 38 gallons of water was retained on the pad, 24 gallons returned to the wet well via penetrations in the containment pad, and 138 gallons of water came in contact with soil on the north and west sides of the containment pad.

At the time the spill occurred, the Seep Well Field (SWF) was the only offsite well field operating. The Athens Road Well Field (AWF) was not operating at the time of the spill as infrastructure upgrades were being completed that prevented the operation of the vertical turbines at Lift Station 3. As such, the perchlorate concentration of the water spilled is 10 – 11 mg/L. These are the flow-based average concentrations reported in the September and October 2016 GWETS Monthly Reports.

Corrective Action Plan

As described above, soil north and west of the containment pad was impacted by the released groundwater. NERT has devised a plan to remove shallow soil located on the north side of the containment pad that was impacted by spilled groundwater. Based on the presence of electrical conduits along the western side of the containment pad, soil removal at this time is not practical as this would require shutting down both the AWF and SWF for a significant period of time. Given the sensitive nature of the buried infrastructure, hand excavation would be required and the power to the lift station would need to be shut off. When NERT ultimately decommissions Lift Station 2, a soil sampling program will be implemented to thoroughly characterize soil within the lift station.

Based on visual observations, NERT estimates that soil was impacted up to 3 feet from the northern edge of the containment pad. As such, NERT plans to remove and dispose of soil within an area of approximately 20 feet long by 3 feet wide, to a depth of 6 inches. The dimensions of the excavation area are based visual observations when the spill was discovered and the visible increase in grade north of the containment pad. This area is displayed in Photograph 1 displayed below.

Photograph 1
Extent of Excavation with Lift Station 2



Following removal of the surface soil, two soil samples will be collected from the base of the excavation and the excavation will be backfilled with soil or gravel. The location of the soil samples are shown in Photograph 1 above. Soil sampling will be completed in accordance with the procedures described in the Remedial Investigation/Feasibility Study Work Plan (Ramboll, 2014). These samples will be submitted to Test America for perchlorate analysis (Method 314.0). The analytical results will be used to document perchlorate concentrations in soil left in place. If the perchlorate concentrations exceed NDEP Basic Comparison Levels NERT will conduct additional removal activities when the lift station is decommissioned.

The excavated soil will be placed in a roll-off box or drums for disposal. Based on recent groundwater analysis the primarily contaminant likely impacting the soil is perchlorate. After the soil has been placed in the appropriate container, a composite sample will be collected following the procedures specified in the Site

Office of the Nevada Environmental Response Trust Trustee
December 8, 2016

Management Plan, Revision 1 for excavation control area soil. This sample will be analyzed for perchlorate and any other parameters requested by the disposal facility. Based on existing knowledge, NERT anticipates that this soil will be disposed as a non-hazardous waste.

Reporting

Following completion of the soil removal, NERT will prepare a letter documenting the removal activities implemented.

Closing

If you have any questions or concerns regarding this matter, feel to contact me at (702) 960-4309 or at steve.clough@nert-trust.com.

Office of the Nevada Environmental Response Trust



Stephen R. Clough, P.G., CEM
Remediation Director
CEM Certification Number: 2399, exp. 3/24/17

Cc (via NERT Sharefile Distribution):

Greg Lovato, Nevada Division of Environmental Protection
James Dotchin, NDEP Bureau of Industrial Site Cleanup
Carlton Parker, NDEP Bureau of Industrial Site Cleanup
Weiquan Dong, NDEP Bureau of Industrial Site Cleanup
Christa Smaling, NDEP Bureau of Industrial Site Cleanup
Micheline Fairbank, Nevada Attorney General's Office
Alison Fong, U.S. Environmental Protection Agency, Region 9
Jay Steinberg, as President of the Nevada Environmental Response Trust Trustee and not individually
Andrew Steinberg, as Vice President of the Nevada Environmental Response Trust Trustee and not individually
Tanya C. O'Neill, Foley and Lardner, LLP
Derek Amidon, Tetra Tech
Dan Pastor, Tetra Tech
Allan DeLorme, Ramboll Environ
John Pekala, Ramboll Environ

Cc (via NERT Stakeholder Sharefile Distribution):

Betty Kuo, Metropolitan Water District of Southern California
Brenda Pohlmann, City of Henderson
Carol Nagai, Metropolitan Water District of Southern California
David Johnson, Central Arizona Water Conservation District
Dave Johnson, LV Valley Water District
Eric Fordham, Geopentech
Jill Teraoka, Metropolitan Water District of Southern California
Kevin Fisher, LV Valley Water District
Marcia Scully, Metropolitan Water District of Southern California
Maria Lopez, Metropolitan Water District of Southern California
Mickey Chaudhuri, Metropolitan Water District of Southern California
Orestes Morfin, Central Arizona Water Conservation District

Office of the Nevada Environmental Response Trust Trustee
December 8, 2016

Peggy Roefer, Colorado River Commission
Scott Bryan, Central Arizona Project
Steven Anderson, LV Valley Water District
Sun Liang, Metropolitan Water District of Southern California
Ted Wolff, Manatt, Phelps & Phillips LLP
Todd Tietjen, Southern Nevada Water Authority
Kirk Stowers, Broadbent Inc.
Kurt Fehling, The Fehling Group