

TECHNICAL MEMORANDUM

To: Nevada Environmental Response Trust

Cc: Nevada Division of Environmental Protection
United States Environmental Protection Agency

From: Dana Grady

Date: March 29, 2021

Subject: Las Vegas Wash Bioremediation Pilot Study Monthly Progress Report

At the direction of the Nevada Environmental Response Trust (NERT or Trust), Tetra Tech, Inc. (Tetra Tech) has prepared this memorandum which summarizes Tetra Tech's progress during February 2021 toward successfully implementing the Las Vegas Wash Bioremediation Pilot Study.

Task Progress Update: February 2021

Task M19 – Las Vegas Wash Pilot Study

- Current Status
 - Injections – The first injection event was completed in December 2020 and the pilot study is currently in the effectiveness monitoring phase. A summary of the injections was provided in the previous January 2021 monthly progress report. On-going effectiveness monitoring program and results are provided below. A layout map and construction details of all injection, monitoring, and extraction wells are provided as Figures 1 through 4 and Table 1.
 - Effectiveness Monitoring – Baseline groundwater sampling was completed in the fall of 2020 prior to the first injection event. Following the first injection event, the monitoring program described in the Work Plan Addendum was implemented to evaluate the effectiveness of in-situ bioremediation. As part of this monitoring program, groundwater sampling was conducted on a biweekly basis for the Zone 2 alluvium for the first two months post-injection and was followed by a monthly sampling program thereafter, which is ongoing. Groundwater sampling is being conducted monthly in the Upper Muddy Creek formation (UMCf), and/or UMCf-coarse grained (cg) for Zones 1, 2, and 3. The most recent monthly groundwater sampling event was conducted from February 8, 2021 through February 15, 2021.
 - Available groundwater analytical results from the baseline sampling event and effectiveness monitoring events performed in December 2020 and January 2021 (two biweekly sampling events and the first monthly sampling event following injections) are provided in Table 2. Groundwater analytical results from the second monthly groundwater

sampling event recently completed in February 2021 will be provided in future monthly progress reports as data become available. Results are summarized below.

- Zone 2 Alluvium:
 - Cross-gradient monitoring wells LVWPS-A2-MW04A/B and LVWPS-A2-MW05A/B, which are located approximately 17 feet from each end of the Zone 2 injection well transect, continue to observe perchlorate concentration decreases in groundwater samples, ranging from 32 to 99 percent reduction when compared to baseline concentrations.
 - Groundwater samples collected from the 14 monitoring wells located approximately 50 to 100 feet downgradient of the injection well transect exhibited an overall average percentage decrease in groundwater perchlorate concentrations (compared to baseline concentrations) of up to 60 percent during the first monthly post-injection sampling event. Of these 14 monitoring wells, groundwater samples collected from five monitoring wells have observed a greater than 90 percent reduction in perchlorate concentrations during the sampling events conducted approximately four and six weeks following injection activities compared to baseline.
 - Groundwater samples collected six weeks after injection activities from monitoring wells LVWPS-MW208B and LVWPS-MW223B, which are located approximately 200-250 feet downgradient of the injection well transect, exhibited perchlorate concentration decreases of greater than 90 percent when compared to baseline concentrations.
 - Chlorate results followed a similar pattern to perchlorate results for samples collected during sampling events at four and six weeks post-injection. Groundwater samples collected from three of the four cross-gradient monitoring wells showed decreases in chlorate concentrations of greater than 80 percent compared to baseline. Groundwater samples collected from 11 of the 18 monitoring wells located between 50 and 250 feet downgradient of the injection well transect exhibited reductions in chlorate concentration of greater than 70 percent. Of these 11 monitoring wells, groundwater samples collected from eight of these monitoring wells exhibited concentration decreases greater than 90 percent when compared to baseline.
 - Nitrate concentrations in groundwater were also evaluated because it is often a competing and preferred electron acceptor and carbon substrate consumer. Nitrate concentrations in groundwater samples collected from Zone 2 alluvium monitoring wells averaged 17 milligrams per liter (mg/L) during the baseline sampling event. Since injections, nitrate concentrations have reduced an average of 65 percent in groundwater samples collected from cross-gradient and downgradient monitoring wells. During the first monthly and second biweekly sampling events, groundwater samples collected from 18 cross-gradient or downgradient monitoring wells exhibited decreases in nitrate concentrations to less than 10 mg/L. Of these 18 monitoring wells, groundwater samples collected from seven monitoring wells exhibited nitrate concentrations less than 1 mg/L.
- Zone 1, 2, and 3 UMCf/UMCf-cg:
 - Zone 1 UMCf – Approximately one month following injections into Zone 1 UMCf, groundwater samples collected from three of the six monitoring wells located

approximately 25 feet downgradient of the injection well transect exhibited a greater than 90% reduction in perchlorate concentrations compared to baseline. Other notable groundwater perchlorate concentration decreases when compared to baseline include groundwater samples collected from one monitoring well located 100 feet downgradient of the injection well transect (LWPS-U1-MW09B) observed a 41 percent reduction in perchlorate concentrations. Lastly, reductions were also observed in two upgradient monitoring wells, namely LWPS-U1-MW06B and LWPS-U1-MW07. This was expected based on the low effective porosities observed and calculated during injection activities. Low effective porosity causes injectate solution to move farther from the injection points (both upgradient and downgradient) during injections, particularly when injecting under pressure. Nitrate and chlorate concentrations followed a similar pattern to perchlorate.

- Zone 2 UMCf – Approximately one month following injections into Zone 2 UMCf, groundwater samples collected from cross-gradient monitoring wells LWPS-U2-MW04 and LWPS-U2-MW05, which are screened in the UMCf and located approximately 12 feet from the injection well at either end of the Zone 2 injection well transect, indicate perchlorate concentration reductions of greater than 99 percent when compared to baseline. Additionally, groundwater samples collected from monitoring well LWPS-U2-MW17, which is located approximately 100 feet downgradient of the Zone 2 injection well transect, indicate a perchlorate reduction of approximately 60 percent when compared to baseline. Nitrate and chlorate concentrations followed a similar pattern to perchlorate.
- Zone 3 UMCf-cg – Approximately one month following injections into Zone 3 UMCf-cg, five of the ten monitoring wells located approximately 25 to 50 feet downgradient exhibited a greater than 97% reduction in perchlorate compared to baseline conditions. In addition, monitoring wells LWPS-U3-MW10A/B, which are approximately 100 feet downgradient of the Zone 3 injection well transect, both exhibited a greater than 99% reduction in perchlorate, chlorate, and nitrate concentrations compared to baseline conditions. These observations farther downgradient relative to observations in the UMCf in Zones 1 and 2 are likely related to the coarser-grained aquifer matrix in Zone 3 UMCf-cg and associated with faulting in the area.
- Surface water sampling was performed prior to injection activities on October 16, 2020 and October 29, 2020. Three surface water sampling events have since been performed in December 2020 (during injections) and January and February 2021 (after injections). It should be noted that although limited surface water sampling will be periodically conducted downgradient of the study area, reducing perchlorate concentrations in surface water is not an objective of this pilot study. Noteworthy results related to the pilot study will be summarized in future monthly progress reports as warranted.
- Dye Study – As part of injection activities, rhodamine WT and fluorescein tracer dyes were injection into the alluvium and UMCf/UMCf-cg, respectively. A summary of the sampling program and results from the December 2020 and January 2021 sampling events was presented to NDEP on March 4, 2020. An abbreviated summary is provided below. Available analytical results for dye samples collected during baseline activities, injection activities, and the December 2020 and January 2021 effectiveness monitoring events are provided Table 3. It should be noted that there were several cases where charcoal samplers showed low detections of dye, but the water samples did not show dye, indicating that either the dye peak already passed before the water

sample was collected, or the levels of dye in the water are so low that they are not detectable. Results from future sampling events will be evaluated to provide additional clarification of the likely scenario. Noteworthy results during this monitoring period are described below:

- Zone 2 Alluvium:
 - During injection activities, rhodamine tracer dye was measured in all four of the Zone 2 alluvium dose response wells. One month following injection activities, rhodamine tracer dye was still being detected in all four dose response wells.
 - As previously discussed, cross-gradient monitoring wells LVWPS-A2-MW04A/B and LVWPS-A2-MW05A/B (located approximately 17 feet from either end of the Zone 2 injection well transect) had detections of rhodamine dye with the field probe in all four of these wells during injections. Approximately six weeks following injections, rhodamine dye was detected in groundwater samples collected from monitoring well LVWPS-A2-MW05B. However, TOC concentrations (a surrogate for the carbon substrate injected) remain elevated above baseline concentrations in all four ROI wells. This is expected based on the ability of the emulsified vegetable oil to adsorb to the subsurface in the vicinity of the injection well transect, whereas the tracer dye continues to move downgradient.
 - As expected, the high groundwater flow velocity in the alluvium resulted in many downgradient wells observing the presence of dye during active injections or within a few days after injections were completed. Approximately one month after injection activities were completed, rhodamine dye was detected in Zone 2 alluvium groundwater samples collected from seven monitoring wells located 50 to 250 feet downgradient of the injection well transect. In addition, rhodamine dye was detected in charcoal samples collected from monitoring wells LVWPS-MW209 and LVWPS-MW210A/B, which are located approximately 625 and 850 feet downgradient, respectively.
- Zone 1, 2, and 3 UMCf/UMCf-cg:
 - Zone 1 UMCf – One month after injections were completed in Zone 1 UMCf, fluorescein tracer dye was no longer detected in groundwater samples collected 50 feet upgradient of the injection well transect at LVWPS-U1-MW06B and LVWPS-U1-MW07, indicating downgradient migration over time. Dye continued to be detected in both charcoal and groundwater samples collected from monitoring wells LVWPS-U1-MW08A/B (located 25 feet downgradient). Fluorescein was also detected in charcoal samples from alluvial wells located 100 to 150 feet downgradient of the Zone 1 UMCf injection well transect, likely indicating upflux from the UMCf into the alluvium in this vicinity.
 - Zone 2 UMCf – Approximately one month after injections, fluorescein was detected in charcoal and/or groundwater samples collected from both dose response wells (LVWPS-U2-DR01 and LVWPS-U2-DR02) and both cross-gradient monitoring wells located approximately 12 feet from the injection well transect. Rhodamine and low levels of fluorescein were detected in groundwater at LVWPS-U2-MW17, which is located 100 feet downgradient. The rhodamine detection is from the injections into the Zone 2 alluvium, which likely migrated into the downgradient UMCf well due to localized downward gradients present within Zone 2. Fluorescein was also detected in charcoal samples from alluvial wells located 100 to 200 feet downgradient of the Zone 2 UMCf injection well transect, likely indicating upflux from the UMCf into the alluvium in this vicinity.

- Zone 3 UMCf-cg – Approximately one month after injections were completed in the Zone 3 UMCf-cg, fluorescein was detected in either charcoal or groundwater samples collected from all dose response wells and four of the six monitoring wells located approximately 25 feet downgradient of the Zone 3 injection well transect. In addition, fluorescein tracer dye was detected in charcoal samples collected from monitoring wells LVWPS-U3-MW10A/B and LVWPS-MW12A/B, which are located approximately 100 and 150 feet downgradient, respectively.
- Access and Permitting
 - All access agreements and permits are now in place for all projected pilot study activities.
- Schedule and Progress Updates
 - The third monthly effectiveness monitoring event is scheduled for the week of March 8, 2021.
- Health and Safety
 - There were no safety incidents related to Task M19 during February 2021.
 - Safety measures continue to be implemented to minimize potential exposure to COVID-19, including the use of face coverings, gloves, and hand sanitizer, as well as protocols for monitoring temperatures, minimizing the number of people on site at one time, and evaluating tasks to increase physical distance between personnel.

CERTIFICATION

Las Vegas Wash Bioremediation Pilot Study Monthly Progress Report

Nevada Environmental Response Trust Site (Former Tronox LLC Site) Henderson, Nevada

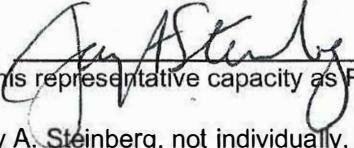
Nevada Environmental Response Trust (NERT) Representative Certification

I certify that this document and all attachments submitted to the Division were prepared at the request of, or under the direction or supervision of NERT. Based on my own involvement and/or my inquiry of the person or persons who manage the system(s) or those directly responsible for gathering the information or preparing the document, or the immediate supervisor of such person(s), the information submitted and provided herein is, to the best of my knowledge and belief, true, accurate, and complete in all material respects.

Office of the Nevada Environmental Response Trust

Le Petomane XXVII, not individually, but solely in its representative capacity as the Nevada Environmental Response Trust Trustee

Not Individually, but Solely
as President of the Trustee

Signature: , not individually,
but solely in his representative capacity as President of the Nevada Environmental Response Trust Trustee

Name: Jay A. Steinberg, not individually, but solely in his representative capacity as President of the Nevada Environmental Response Trust Trustee

Title: Solely as President and not individually

Company: Le Petomane XXVII, Inc., not individually, but solely in its representative capacity as the Nevada Environmental Response Trust Trustee

Date: 3/29/21

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 prepared 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. I hereby certify that all laboratory analytical data was generated by a laboratory certified by the NDEP for each constituent and media presented herein.

Description of Services Provided: Las Vegas Wash Bioremediation Pilot Study Monthly Progress Report, Nevada Environmental Response Trust Site, Henderson, Nevada.



Kyle Hansen, CEM
Field Operations Manager/Geologist
Tetra Tech, Inc.

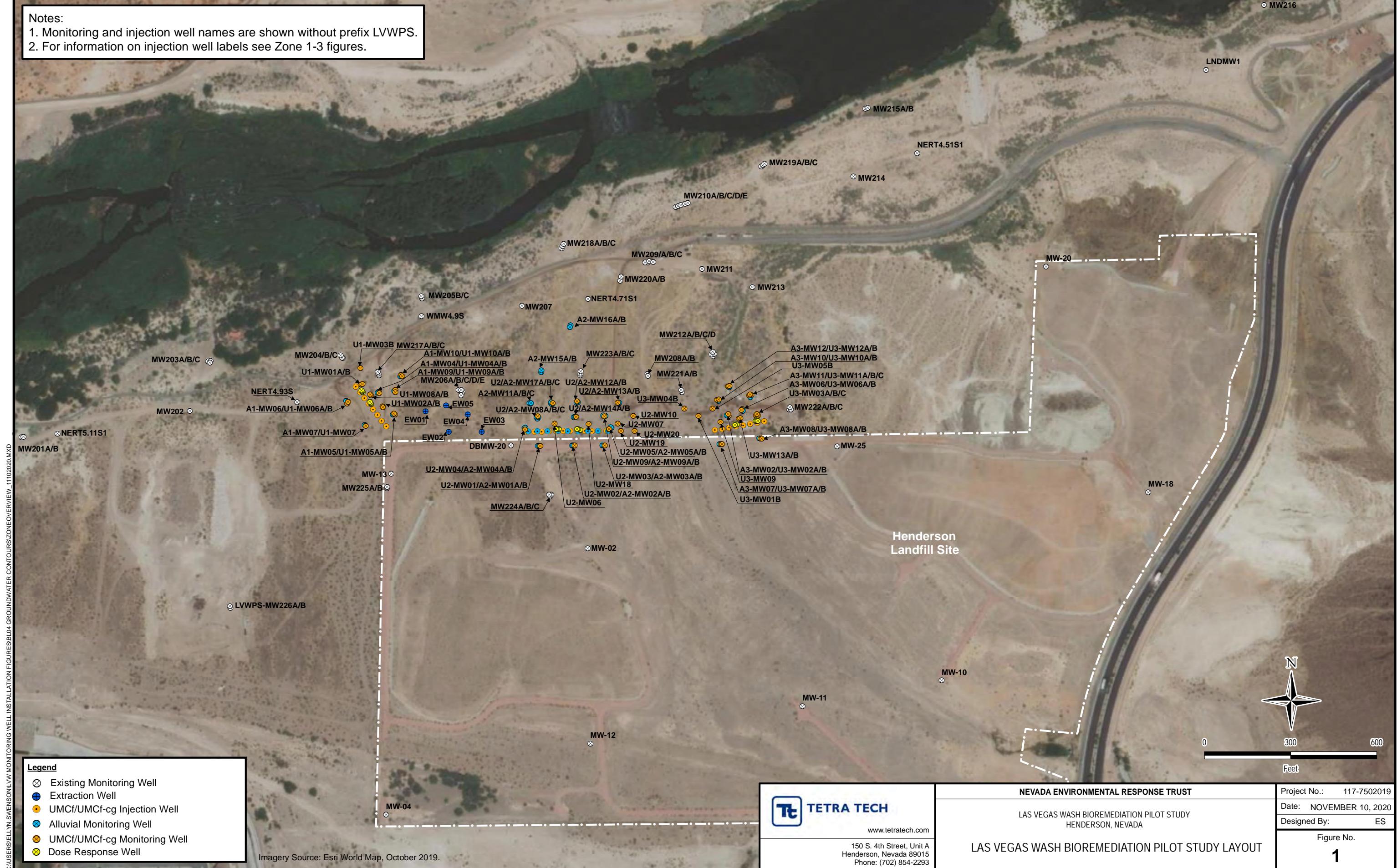
March 29, 2021

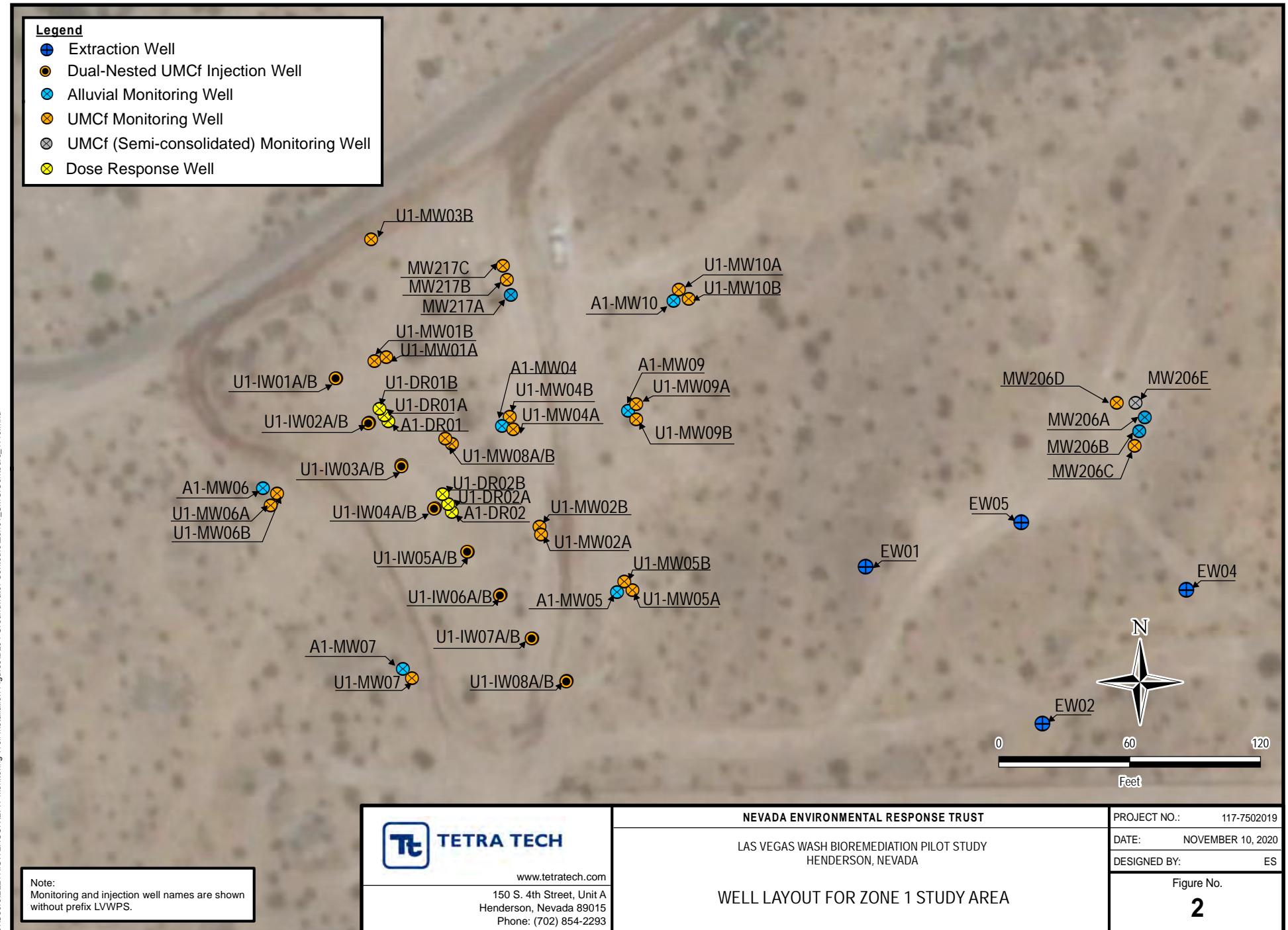
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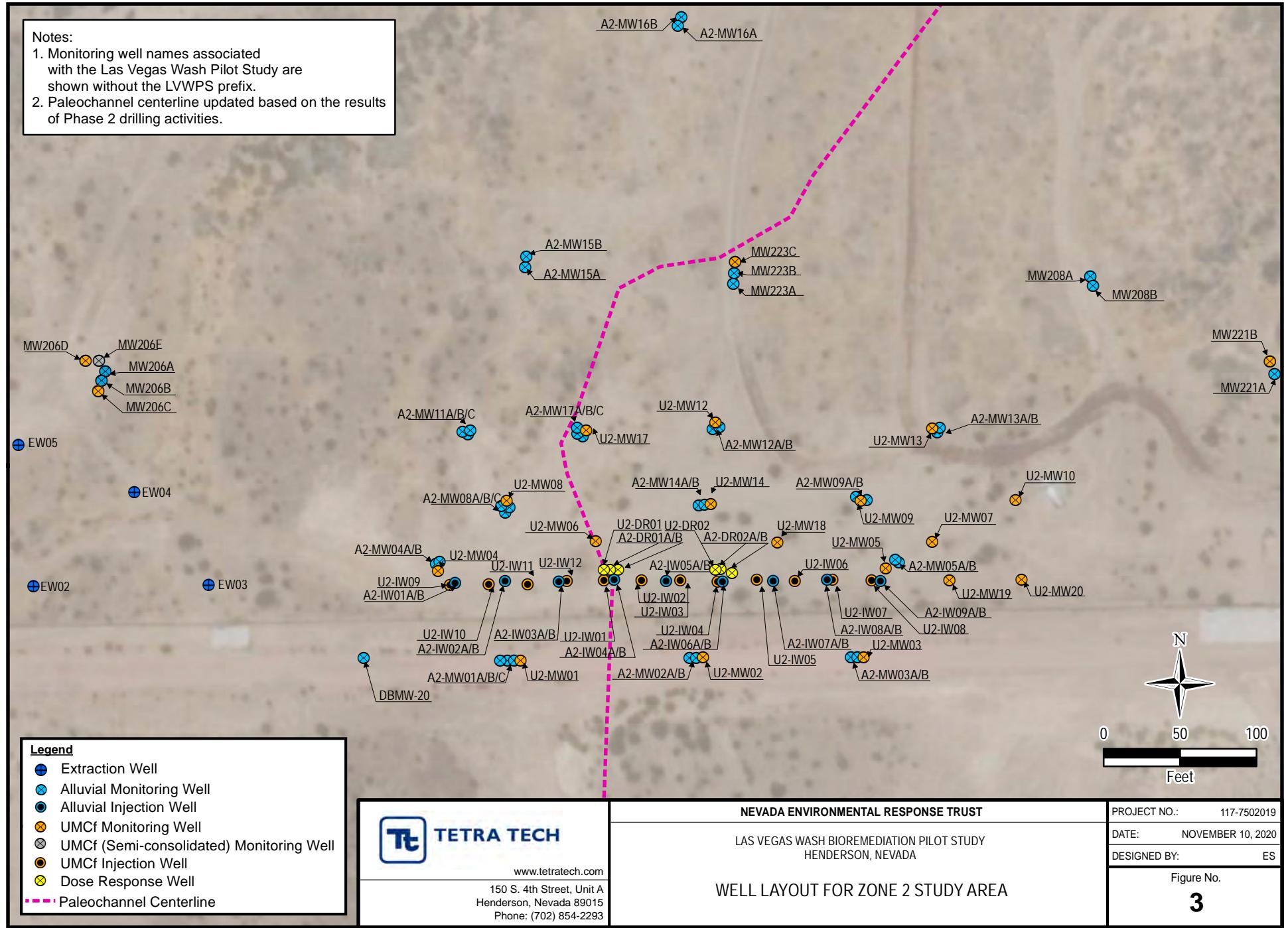
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Nevada CEM Expiration Date: September 18, 2022

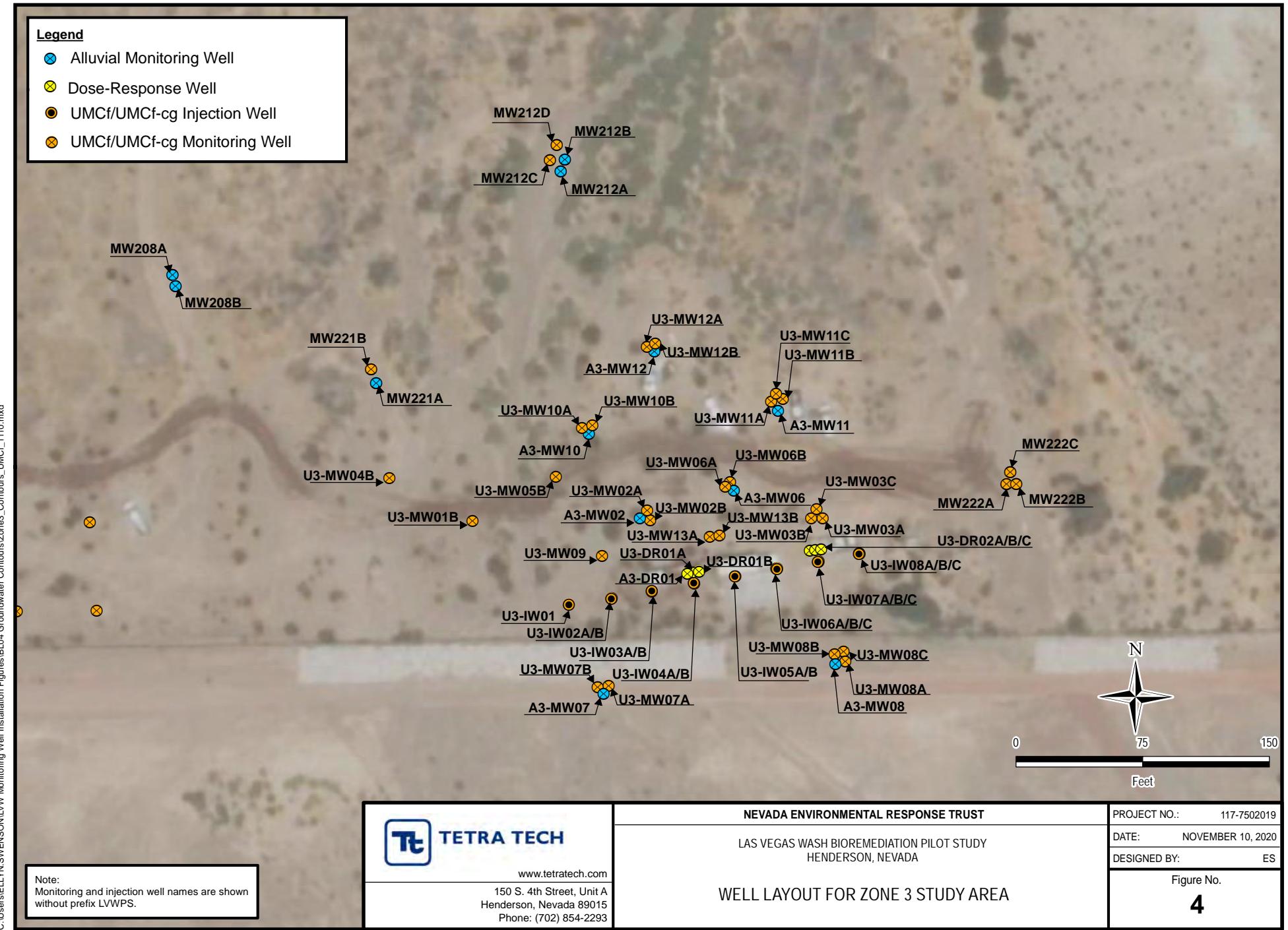
Figures

Notes:
 1. Monitoring and injection well names are shown without prefix LWWPS.
 2. For information on injection well labels see Zone 1-3 figures.









Tables

Table 1
Phase 2 Well Construction Details
Las Vegas Wash Bioremediation Pilot Study

Well ID	Screened Lithology	Northing	Easting	Ground Surface Elevation	Top of Casing Elevation	Depth to Water ¹	Construction Type	Construction Material	Slot Size	Filter Pack Gradation	Borehole Diameter	Borehole Total Depth	Well Diameter	Nominal Screen Length	Well Total Depth	Bottom of Screen	Top of Screen
				feet amsl	feet amsl	feet bTOC			inches	inches	feet bgs	inches	feet	feet bgs	feet bgs	feet bgs	feet bgs
LVWPS-EW03	Alluvium	26734886.94	838621.90	1523.14	1522.70	28.95	Single	Schedule 40 PVC with Stainless Steel Wire Wrap Screen	0.020	12-20	10	81.0	6	30	70.5	70	40.3
LVWPS-EW04	Alluvium	26734947.54	838573.33	1522.40	1521.92	28.20	Single	Schedule 40 PVC with Stainless Steel Wire Wrap Screen	0.020	12-20	10	47.0	6	20	46.5	46	26.3
LVWPS-EW05	Alluvium	26734978.54	838497.51	1529.76	1529.42	35.60	Single	Schedule 40 PVC with Stainless Steel Wire Wrap Screen	0.020	12-20	10	81.0	6	30	80.5	80	50.3

Notes

amsl - above mean sea level

bgs - below ground surface

bTOC - below top of casing

PVC - polyvinyl chloride

UMCf - Upper Muddy Creek formation

UMCf-cg - Upper Muddy Creek formation - coarse grained facies

UMCf/Horse Springs- Alternating layers of UMCf, semi-consolidated UMCf, and reworked Horse Springs formation.

UMCf (Semi-Cons) - Semi-consolidated Upper Muddy Creek formation

--- Not Applicable

1. Depth to water measurements collected in October 2020.

2. Well names including IW indicate an injection well. Well names including DR indicate a dose response well. Well names including MW indicate a monitoring well. Well names including EW indicate an extraction well.

