

October 1, 2014

Mr. Weiquan Dong, PE  
Bureau of Corrective Actions, Special Projects Branch  
Nevada Division of Environmental Protection  
2030 E. Flamingo Rd., Suite 230  
Las Vegas, Nevada 89119

**Re: Site Management Plan (SMP) Annual Report, June 1<sup>st</sup> 2013 – May 31<sup>st</sup> 2014; Nevada Environmental Response Trust Site, Henderson, Nevada; NDEP Facility ID #H-000539**

Dear Mr. Dong:

On behalf of the Nevada Environmental Response Trust (the Trust), ENVIRON International Corporation (ENVIRON) has prepared this Site Management Plan (SMP) Annual Report for the period June 1, 2013 through May 31, 2014. This Annual Report has been prepared consistent with Section 3.4.2 of the SMP to summarize and evaluate the results of the inspection, maintenance, and monitoring activities and to document the continued adequacy of the implemented risk management measures at the Nevada Environmental Response Trust Site (the Site) in Henderson, Nevada. The SMP was initially submitted to NDEP in April 2012. On May 23, 2012 and May 30, 2012, errata were submitted to address NDEP's May 14, 2012 comments provided to ENVIRON via phone conversation and to incorporate the most recent NDEP worker Basic Comparison Levels (BCLs). The April 2012 SMP and two errata letters (ENVIRON, 2012a; hereafter referred to as the 2012 SMP) were approved by NDEP on June 1, 2012. Following an annual review of the 2012 SMP, ENVIRON prepared an updated Site Management Plan, Revision 1 dated October 2013 (ENVIRON, 2013b; hereafter referred to as the 2013 SMP). The 2013 SMP was approved by NDEP on November 7, 2013. For this annual reporting period, please note that the 2012 SMP was effective June 1, 2013 through November 6, 2013, and the 2013 SMP was effective from November 7, 2013 through the end of the reporting period (May 31, 2014).

As described in the 2013 SMP, this Annual Report provides the following:

- A summary of the results of the inspection, maintenance, and monitoring of the risk management measures that are implemented through the SMP;
- Documentation of compliance with the SMP including that appropriate notifications have been made and that appropriate protocols for subsurface activities have been implemented;
- Documentation of any instances of noncompliance with the SMP and the actions taken to remedy the issues; and
- Recording of any changes to each ECA boundary, based on work conducted during the previous year.

### **Inspection, Maintenance, and Monitoring Activities and Implemented Risk Management Measures**

An evaluation of the results of the inspection, maintenance, and monitoring activities and the adequacy of the risk management measures during the period of June 1, 2013 through May 31, 2014 is provided below.

- The Sites' land uses were confirmed to be consistent with those assumed in the SMP (i.e., industrial/commercial) in terms of exposure risk assumptions;
- There were no significant changes in land use or COPC toxicity parameters that warranted conducting additional risk analysis or additional mitigation;
- ECA E3 (Facilities at the Eastern End of the Beta Ditch) was removed from the ECA list following successful remediation in October 2013 (ENVIRON, 2014a);
- Groundwater has not been used for drinking water or any other purpose at the Site;
- The groundwater monitoring data evaluated in the Annual and Semi-Annual Remedial Performance Reports for Chromium and Perchlorate (ENVIRON, 2012b; ENVIRON, 2013a) indicated that there were no significant changes in Site environmental conditions that require modification of this SMP; and
- On behalf of the Trust, ENVIRON and Geotechnical & Environmental Services, Inc. (GES) inspected the Site as necessary and verified that risk management controls are being implemented at the Site.

### **SMP Compliance**

Upon approval of the 2013 SMP, all Site Occupants were provided a copy of the SMP and notified of the known environmental conditions at the Site and the requirements of the SMP. Each Site Occupant, excluding Tronox LLC (Tronox), certified that it would comply with the provisions in the 2013 SMP. The Certifications of Compliance (included as Requirement 1 of the 2013 SMP) for all Site Occupants, excluding Tronox, are included as Attachment A of this letter. The work conducted by Tronox, their contractors, or any other third party performing work for Tronox, was completed in compliance with the SMP, as certified by GES.

ENVIRON certifies that all Site disturbances were conducted in compliance with the SMP including the appropriate notifications and with the appropriate protocols for subsurface activities; except as noted below:

- A Utility Project to replace a septic tank was completed in April 2014. The Utility Project was performed substantively in compliance with the SMP; however, it was performed without an approved work plan or contingency plan for work within 50 feet of a groundwater extraction and treatment system (GWETS) component. The septic tank replacement activities resulted in a spill of untreated groundwater from a well pipeline on April 2, 2014 and a subsequent related spill occurred on April 4, 2014. The incident was reported by ENVIRON to the NDEP spill hotline within 24 hours of each event and in writing on April 8, 2014 to NDEP in the report "Report of Spill of Untreated Groundwater from Well Pipeline" (ENVIRON, 2014b). Excavated soils resulting from the spills were handled in accordance with the SMP.
- A Utility Project for the installation of the GW-11 pond intake structure was conducted between February and June 2014. A Work Plan for Management of Excavated Soil and Contingency Plan for Potential Releases of Untreated Groundwater was submitted to NDEP on February 19, 2014 and was approved by NDEP on February 20, 2014. All work was performed in accordance with Section 4.6 (Utility Projects) of the SMP. Field activities were completed on June 10, 2014 and the report was submitted on September 2, 2014, after the allotted 45 day reporting period.

## Summary

The evaluation of the results of the inspection, maintenance, and monitoring activities and the continued adequacy of the implemented risk management measures at the Site during the Annual Review period indicate that with the two exceptions described above, all site disturbances have been conducted in compliance with the SMP.

Sincerely,



Kimberly Kuwabara, MS  
Senior Manager  
Nevada CEM #2353, expires 3/20/2015



Allan J. DeLorme, PE  
Principal

## Attachment

cc: BMI Compliance Coordinator, NDEP, BCA, Las Vegas  
NDEP c/o Kirk Stowers, Broadbent and Associates, Inc.

ec: James Dotchin, NDEP  
Greg Lovato, NDEP  
Alison Fong, USEPA  
Katherine Baylor, USEPA  
Nevada Environmental Response Trust  
Tanya O'Neill, Foley & Lardner LLP  
Kirk Stowers, Broadbent & Associates, Inc.  
Kurt Fehling, The Fehling Group  
Jeff Gibson, AMPAC  
Mark Paris, BMI  
Lee Farris, Landwell

Ranjit Sahu, BMI  
Joe Kelly, Montrose  
Paul Sundberg, Montrose  
Curt Richards, Olin  
David Share, Olin  
Chuck Elmendorf, Stauffer  
Nick Pogoncheff, Stauffer  
George Crouse, Syngenta  
Richard Pfarrer, TIMET  
Enoe Marcum, WAPA

## Attachments

Attachment A            Certifications of Compliance with 2013 Site Management Plan

## References

ENVIRON International Corporation (ENVIRON), 2012a. Site Management Plan (SMP), Nevada Environmental Response Trust Site, Henderson, Nevada. Revised April 2012 with May 23 and May 30, 2012 Errata. NDEP approved June 1, 2012.

ENVIRON, 2012b. Annual Remedial Performance Report for Chromium and Perchlorate, July 2011-June 2012; Nevada Environmental Response Trust Site, Henderson, Nevada. August 31. ENVIRON submitted response to comments on June 10, 2013. NDEP approved July 2, 2013.

ENVIRON, 2013a. Semi-Annual Remedial Performance Report for Chromium and Perchlorate, July 2012-December 2012; Nevada Environmental Response Trust Site, Henderson, Nevada. March 1. ENVIRON submitted response to comments on June 10, 2013. NDEP approved July 2, 2013.

ENVIRON, 2013b. Site Management Plan, Revision 1, Nevada Environmental Response Trust Site, Henderson, Nevada. Revised September 30, 2013 with Revision 1 submitted October 31, 2013. NDEP approved November 7, 2013.

ENVIRON, 2014a. Excavation of Beta Ditch at NERT-TIMET Property Line, Nevada Environmental Response Trust Site, Henderson, Nevada. March 31. NDEP approved June 3, 2014.

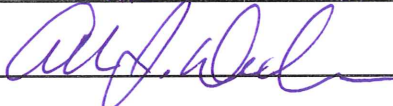
ENVIRON, 2014b. Report of Spill of Untreated Groundwater from Well Pipeline, NPDES Permit NV0023060, Groundwater Discharge Permit NEV2001515, Henderson, Nevada. April 8.

**Attachment A**  
**Certifications of Compliance with Site Management Plan**

**Certification of Compliance with Site Management Plan**

The undersigned ("Site Occupant") acknowledges receipt of a copy of the Site Management Plan dated October 2013 (the "SMP") prepared by ENVIRON International Corporation pertaining to the Nevada Environmental Response Trust Site located in Clark County, Nevada (the "Site"), which Site is more thoroughly described in the SMP. Site Occupant affirms that it is an owner, operator, tenant, lessee, project manager or other entity with responsibility for activities at the Site. Site Occupant specifically acknowledges having read and understood the provisions of the SMP. Site Occupant further acknowledges that it has the responsibility to ensure that the risk management measures and procedures described in the SMP are fully implemented in any applicable activity or operation. Site Occupant certifies that it will comply with all provisions of the SMP applicable to its occupancy of or work upon the Site. Site Occupant further certifies that it has provided or will provide a copy of the SMP to its contractors and any third parties that Site Occupant may invite to the Site and shall ensure said contractors' or invitees' compliance with the SMP.

An executed copy of this Certification of Compliance must be submitted to the Trust representative at the Site before any activity at the Site begins.

Company: ENVIRON INTERNATIONAL CORP.  
By:   
Printed Name: Allen DeLorme  
Title: Principal  
Date: 7/31/14

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Company: Geotechnical & Environmental Services  
By: Kyle S. Hansen  
Printed Name: Kyle S. Hansen  
Title: Project Geologist  
Date: 6-27-14



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Company: ENVIROGEN TECHNOLOGIES  
By: Wendy Prescott  
Printed Name: WENDY PRESCOTT  
Title: PLANT MANAGER  
Date: 6-30-14



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Company: Tetra Tech, Inc.

By: Derek Amidon

Printed Name: Derek Amidon

Title: Vice President

Date: May 28, 2014

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Company: Logistical Solutions, LLC  
By: Kristopher Everett  
Printed Name: Kristopher Everett  
Title: Project Manager  
Date: 6/25/14