



December 4, 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: SMP-Required Notifications, Work Plan, Contingency Plan, and Construction Mitigation Measures Plan for GW-11 Pond Berm Roadway Improvement Project Nevada Environmental Response Trust Site, Henderson, Nevada

Dear Mr. Dong:

On behalf of the Nevada Environmental Response Trust (“NERT” or the “Trust”), ENVIRON International Corporation (ENVIRON) is pleased to present these notifications and Work Plan, Contingency Plan, and Construction Mitigation Measures Plan for the planned GW-11 Pond berm roadway improvements to be performed by Las Vegas Paving, Inc. (LVP) at the NERT site (the “site”) in Henderson, Nevada. This document has been prepared in accordance with the Site Management Plan, Revision 1 (SMP)¹. The Trust has been advised of and approves of this document. Approval of this document by the Nevada Division of Environmental Protection (NDEP) is required prior to initiating the work described herein.

This document addresses the following notifications and requirements of the SMP:

- Section 4.1 requires submittal of a work plan to NDEP and the Trust for approval when soil disturbing activities will be conducted within an excavation control area (ECA).
- Section 4.3 requires submittal of a contingency plan to NDEP and the Trust for approval, describing actions to be taken if previously unknown contaminated soil is encountered.
- Section 4.4 requires submittal of a Construction Mitigation Measures Plan to NDEP and the Trust for approval, describing mitigation measures to be followed to address potential construction-related impacts during earthwork or construction activities.
- Section 4.7 of the SMP describes notifications and procedures to follow in the event of an emergency project related to an accidental spill or release.
- Section 5.3 requires notification to and approval from NDEP and the Trust for work to be performed within 50 feet of any on-site Groundwater Extraction and Treatment System (GWETS) component.
- Section 5.3.5 requires submittal of a contingency plan to NDEP and the Trust for approval, describing actions to be taken in case of accidental release of untreated groundwater due to damage to any GWETS component.

Anticipated Activities

ENVIRON has retained subcontractor LVP to improve the GW-11 Pond berm roadway with a new three-inch thick layer of crushed limestone aggregate (“chat material”). These activities include limited grading of the existing driveable roadway area to ensure a relatively flat surface prior to

¹ ENVIRON. 2013. Site Management Plan, Revision 1, Nevada Environmental Response Trust Site, Henderson, Nevada. October. Approved by NDEP on November 7, 2013.

emplacement of the chat material, followed by emplacement and compaction of chat material in driveable areas using heavy equipment, as well as emplacement of chat material in non-driveable areas (e.g., pipeways and other areas of the berm roadway that are not accessible by vehicle) using manual methods.

Work within Excavation Control Areas (ECAs)

Per Section 4.1 of the SMP, submittal of this document provides the required notification to NDEP and the Trust of potential soil disturbing activities within ECAs. The work will take place within ECA D3, which includes the entire GW-11 Pond berm area. Soil disturbing activities will be limited to grading of the existing gravel roadway surface along the berm roadway in areas that are accessible by heavy equipment. ENVIRON does not anticipate that this grading will expose underlying soil beneath the existing gravel roadway.

Contingency Plan for Work within 50 feet of a GWETS Component

Per Sections 5.3 and 5.3.5 of the SMP, this document serves as a notification and Contingency Plan to NDEP and the Trust that construction activities will be conducted within 50 feet of certain GWETS components. The purpose of the Contingency Plan is to describe the actions to be taken in case of accidental release of untreated groundwater due to damage to any GWETS component. The GWETS components within 50 feet of the work area include the GW-11 Pond, GW-11 Pond intake structure, GWETS balance tanks and equalization equipment, associated water transmission pipelines and utilities, and monitoring wells M-79, M-98, M-99, M-134, M-135, M-136, and M-161.

Precautions

Construction personnel and subcontractors will implement the following precautions and procedures during implementation of the construction activities:

- Daily health and safety “tailgate” meetings will be held prior to the start of field work. In addition to discussions of health and safety hazards and preventions, the names and mobile phone numbers for all field staff and subcontractors will be confirmed. Clear lines of communication will be established each day to ensure a swift and coordinated response to a release.
- Envirogen Technologies, Inc. (ETI), which is the current operator of the GWETS system, will be advised of work that may impact their operations (i.e., work within 50 feet of any GWETS component).
- Protective barriers (e.g., barricades, traffic cones/pylons, caution tape, etc.) will be used as necessary when activities that involve the use of heavy equipment (i.e., trucks, graders, rollers) are performed near exposed wells or other exposed GWETS infrastructure.
- ENVIRON will be on site during grading activities to verify the location of GWETS components and to direct the subcontractor to prevent accidental damage to GWETS components. ENVIRON will consult with ETI as necessary to identify locations of GWETS components.
- Work areas will be delineated and monitored as necessary to avoid unauthorized entry during construction work.

Spill Response Procedures

- The primary response action for a release of untreated groundwater during construction activities will be to shut down and contain any uncontrolled flow. ETI will be notified immediately by phone or in person of the need to shut down components of the GWETS due to uncontrolled flow. ETI personnel will have primary responsibility for shutting down the corresponding GWETS components.
- A spill response kit will be readily available during construction activities and utilized in the event of a release of untreated groundwater.

- As described in the SMP, if construction activities result in the release of untreated groundwater, the construction contractor will immediately notify ENVIRON. ENVIRON will immediately notify Weiquan Dong of NDEP at (702) 486-2850, extension 252 and Andrew Steinberg of the Trust at (312) 498-2800 of the release and report on the status of the GWETS operation. If any GWETS components are shut down due to damage to the system(s) or to control the release of untreated groundwater, ENVIRON will provide NDEP, the Trust, and ETI with a written explanation for the shutdown.
- If the construction activity results in the release of untreated groundwater, the release will be reported to the NDEP 24-Hour Spill Notification Line, if required by NAC 445A.345 to 445A.348.

Construction Impact Mitigation Measures

As described in Section 4.4 of the SMP, measures must be implemented to mitigate the potential impacts of the following activities:

- Dust generation associated with grading activities, construction or transportation equipment traveling over on-site soil, and wind traversing soil stockpiles that potentially contain contaminants of potential concern;
- Tracking of soil off the site on the wheels or bodies of construction or transportation vehicles or equipment; and
- Transporting of sediments from the site in surface water run-off.

LVP will implement the following mitigation measures to control the potential impacts of these activities.

Dust Mitigation

Dust mitigation measures are designed to be in compliance with Sections 90-94 of the Clark County Air Quality Regulations, which are administered and enforced by the Clark County Department of Air Quality (DAQ). Because soil disturbing or construction activities will exceed 0.25 acres in overall area for this project, LVP must obtain a Dust Control Permit, which must include a Dust Mitigation Plan, from the DAQ, per Section 94 of the Clark County Air Quality Regulations. The Dust Control Permit, including the Dust Mitigation Plan, will be provided to the Trust and NDEP prior to field work commencement.

To ensure the overall effectiveness of dust control measures at the site, and to remain in compliance with Section 94 of the Clark County Air Quality Regulations, a contractor employee will be designated as the Dust Control Monitor and will be present for all potential dust generating activities. Dust control measures implemented by the contractor will include the following activities, at a minimum.

- Limit vehicle speeds on unpaved or off-road areas to 5 miles per hour;
- Control grading activities and the pace or speed of work;
- Minimize drop heights during loading activities; and
- Utilize water trucks (or water tanks/sprayers mounted on support trucks or trailers) to conduct wet suppression at areas where work activities have the potential to generate significant dust.

Dust Monitoring

During all work the construction contractor will monitor for potential dust producing conditions. If visible dust is being created, an ENVIRON field technician will perform work zone dust monitoring both upwind and downwind of active work areas (using a calibrated pDR-1000AN or equivalent). Differential dust monitoring results in excess of 100 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) will be reported to the contractor to ensure that dust control measures are being implemented correctly or

increased when necessary. The action level of $100 \mu\text{g}/\text{m}^3$ of dust has been used during past soil remediation, excavation, and backfilling activities at the site. This action level is designed to prevent fugitive dust emissions from the site, as required by the DAQ. The action level is also designed to be protective of human health based on known impacts to soil at the site. A Dust Control Permit from Clark County is required and all permit requirements will be followed. All field activities that have the potential to generate dust will include dust mitigation measures as described above, and will be conducted in conformance with the County's regulations for prevention of fugitive dust emissions from the site.

Track-Out Mitigation and Equipment Decontamination

Tracking of soils outside of the work area will be mitigated by equipment and vehicle decontamination. In general, dry decontamination methods will be used including brushing, scraping, or vacuuming of equipment bodies, wheels or treads, and vehicle tires. Scrapings will be maintained within the work area.

Close attention will be paid to the effectiveness of dry decontamination methods, and if dry methods are not effective (for example: due to wet or muddy conditions), wet decontamination methods, including pressure washing or steam cleaning will be employed. Any wet decontamination will be performed within the work area, and rinse water will be contained within these areas.

Surface Water Run-Off Mitigation

U.S. Environmental Protection Agency (EPA) regulations [40 CFR 122.26(b)(15)] require National Pollutant Discharge Elimination System (NPDES) storm water discharge permit coverage for discharges from construction activities that disturb one or more acres. Since the GW-11 Pond berm cover activities will affect an area greater than one acre, LVP will submit a Notice of Intent (NOI) to NDEP for coverage under the Construction Storm Water General Permit NVR100000. As a requirement of the Construction Storm Water General Permit, a Storm Water Pollution Prevention Plan (SWPPP) will be prepared and implemented during the berm cover project. The following best management practices (BMPs) are anticipated to be included in the SWPPP and implemented to control potential storm water, dust control water, and sediment run-off from the site. Additional control measures may be included in the SWPPP.

- Structural practices including silt fences, fiber rolls ("straw wattles"), earth dikes, or other erosion control measures, if applicable.
- Administrative practices including limiting dust control water spraying to the amount necessary for dust suppression.
- Placing of chat material stockpiles on plastic sheeting within a silt fence.
- If previously unknown contaminated soils are to be excavated, they will be loaded directly into a plastic lined roll-off bin and covered in plastic sheeting pending analytical testing. Characterization, management and disposal of previously unknown contaminated soil are described further in Section 4.3 of the SMP.
- Daily checks of weather forecast and communication of predicted rain events by the construction contractor.

Previously Unknown Contaminated Soil

Per Section 4.3 of the SMP, LVP will notify ENVIRON if any discolored, oily or odorous soil is encountered, and ENVIRON will call the NDEP 24-Hour Spill Notification Line. ENVIRON will notify the Trust and NDEP Bureau of Corrective Actions (BCA) within 24 hours, as required. If odorous soil is encountered, an ENVIRON field representative will field screen the affected soil with a photoionization detector (PID) and will collect sample(s) of any discolored or oily soil as needed to characterize the potentially impacted soil, as described in Section 4.3 of the SMP. Sampling and

further characterization and handling of the potentially impacted soil will be managed as described in Section 4.3 of the SMP.

Emergency Projects

In the event of an accidental spill or release that could qualify as an emergency project, ENVIRON will prepare an Emergency Project notification for approval by NDEP. Upon approval of the Emergency Project status by NDEP, a work plan for clean-up will be prepared and submitted in general accordance with Section 4.7 of the SMP.

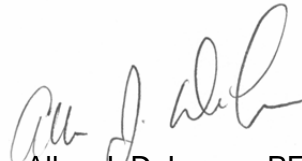
Request for Approval

This Work Plan, Contingency Plan, and Construction Mitigation Measures Plan provides information required by the SMP for implementation of the GW-11 Pond berm roadway improvement project at the NERT site. The Trust desires to complete this project by the end of December 2014. Your prompt review and approval of this work plan is requested and appreciated. Please contact John Pekala at (602) 734-7710 or jpekala@environcorp.com with any comments or questions on this document. ENVIRON will rapidly address any concerns you have regarding the information herein, so that NDEP approval of this document can be provided as soon as possible.

Sincerely,



John M. Pekala, PG
Senior Manager
CEM #2347, expires 9/20/2016



Allan J. DeLorme, PE
Principal

cc: BMI Compliance Coordinator, NDEP, BCA, Las Vegas

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