

OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE

Le Petomane XXVII, Inc., Not Individually, But Solely as the Nevada Environmental Response Trust Trustee

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October 8, 2019

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

RE: Treatability / Pilot Study Modification No. 9
Las Vegas Wash ZVI-Enhanced Bioremediation Treatability Study Work Plan
Nevada Environmental Response Trust
Henderson, Nevada

Dear Dr. Dong:

The Nevada Environmental Response Trust (NERT) is pleased to present Treatability / Pilot Study Modification No. 9 to modify the Las Vegas Wash ZVI-Enhanced Bioremediation Treatability Study (Study) Work Plan (formerly known as the Galleria Drive ZVI Bioremediation Treatability Study as discussed in more detail below) for Nevada Division of Environmental Protection (NDEP) review. The Galleria Drive ZVI Bioremediation Treatability Study Work Plan (the "Work Plan"), submitted by the Trust on September 27, 2017, was approved by NDEP on October 26, 2017. Phase I pre-design activities as part of the approved Work Plan were completed in June 2019. However, as you are aware, recent dialogue between the Trust and Basic Environmental Company (BEC) regarding future development and potential sale of BEC owned parcels along Galleria Drive have resulted in uncertainty with access and timing with respect to completion of Phase 2 implementation activities of the Study. Thus, the Trust directed Ramboll to evaluate nearby parcels to identify potential new locations to implement the treatability study, with minimal impact to the scope to be proposed in the forthcoming Work Plan Addendum while mitigating future access risks. The evaluation, which included dialogue led by the Trust with input from Tetra Tech and Arcadis, determined that "Transect 1A", as identified in the Las Vegas Wash Bioremediation Pilot Test Work Plan (the "LVW Work Plan") is the most suitable location and is the subject of this Treatability Study Modification. The Transect 1A area was characterized by Tetra Tech between March and July 2018 as part of the Phase 1 pre-design investigation activities identified in the LVW Work Plan. Subsequent to the investigation, the Trust revised the scope of the LVW Work Plan to exclude Transect 1A from Phase 2 of that pilot study. Acknowledging the above, Ramboll has reviewed all Transect 1A data and identified a small number of data gaps necessary to be filled in advance of design and implementation of the Phase 2 field test of ZVI technology, which based on its proximal location to the Las Vegas Wash shall now be referred to as the Las Vegas Wash ZVI-Enhanced Bioremediation Treatability Study. Upon identifying Transect 1A as the most suitable location, NERT directed Ramboll to prepare the attached scope of work to implement data gap characterization activities in the area of Transect 1A.

The purpose of this modification is to collect the necessary data to confirm Transect 1A is appropriate for the relocation of Phase 2 activities associated with the ZVI Study. All data obtained as a result of the proposed effort will be summarized in a subsequent Treatability / Pilot Study Modification, which will also serve to formally request relocation should the data obtained from this limited investigation return favorably.

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From a scheduling perspective, and in consideration of NDEP approval, the Trust anticipates completing all necessary permitting, access and planning activities within the four (4) weeks following agency approval and will mobilize to initiate field implementation of the modification activities as soon as practical thereafter. Project updates will be provided through submittal of on-going monthly progress reporting.

If you have any questions or concerns regarding this matter, feel to contact me at (702) 960-4301 or at brian.loffman@lepetomaneinc.com.

Office of the Nevada Environmental Response Trust



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