

April 30, 2020

TECHNICAL MEMORANDUM

To: Steve Clough

Nevada Environmental Response Trust

From: Chris Stubbs, Pejman Rasouli, Ramboll

John Pekala, CEM#2347, Expires 9/20/2020, Ramboll

Re: Phase 3 RI Modification No. 10

High-Frequency Sampling in Las Vegas Wash

Henderson, Nevada

Ramboll Project No. 1690016064-042

This Technical Memorandum presents Ramboll US Corporation's (Ramboll's) recommended Modification No. 10 to the scope of work for Phase 3 of the Remedial Investigation (RI) currently in progress at the Nevada Environmental Response Trust (NERT) Site (the "Site"), located in Henderson, Nevada. The purpose of this modification is to collect high frequency surface water samples from the Las Vegas Wash (the "Wash") in order to better characterize the temporal variation in mass loading of perchlorate in the Wash resulting from discharge of groundwater into surface water within Operable Unit 3 (OU-3). This was one of the recommended areas of additional investigation from the Downgradient Study Area Investigation (AECOM 2019).¹

Currently, monthly estimates of perchlorate mass loading in the Wash at nine transect locations are calculated based on monthly surface water sampling results and surface water flows measured at a series of stream gages operated by the United States Geological Survey (USGS). The sample locations, USGS stream gage locations, and preliminary unvalidated analytical results from February 2020 are shown in Figure 1. Samples are analyzed for perchlorate, chlorate, and total dissolved solids (TDS) at between one and six sampling points per transect. The current surface water sampling program is described in the Phase 2 RI Modifications No. 3, No. 10, and No. 14, all of which have been approved by the Nevada Division of Environmental Protection (NDEP).

Because the flow in the Wash varies significantly on a diurnal cycle, the current monthly sampling frequency does not capture the temporal variation in mass loading resulting from the variation in daily flow. As part of this Phase 3 RI Modification No. 10, high-frequency (i.e., hourly) sampling within Las Vegas Wash will be conducted to better characterize how surface water concentrations change in response to daily and seasonal flow variation. The results of this sampling will be used to evaluate the relationship between instantaneous mass loading at the sampling time and the average mass loading over daily and monthly time scales. This evaluation will allow us to develop a more accurate estimate of average mass loading, which is one of the key metrics that will be used in the upcoming feasibility study to evaluate the effectiveness of alternative remedies.

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¹ AECOM. 2019. Supplemental Surface Water Investigation Technical Memorandum; NERT Remedial Investigation – Downgradient Study Area; Nevada Environmental Response Trust Site; Henderson, Nevada. April.

Ramboll proposes conducting two separate sampling events with one event in the summer and one event in the winter. For each event, hourly sampling for 48 hours at six key locations within the Wash using portable automated sampler technology (available, for example, from Teledyne ISCO and YSI) is proposed. The automated samplers will collect samples hourly using a programable peristaltic pump and provide temporary sample storage. Samples will be retrieved from the automated samplers by Ramboll personnel once per day, and then shipped to a laboratory to be analyzed for perchlorate, chlorate, and TDS.

As shown on Figure 2, proposed sampling locations are co-located with USGS stream gage stations so that stream flow rates are known at each location. The same sampling locations will be used in both the summer and winter sampling events. Table 1 provides the proposed sampling locations and number of the samples at each transect. At Duck Creek (LVW 7.2), Pabco Road (LVW 6.05), and Northshore Road (LVW 0.55), only one sampling point at the center of the Wash is proposed because prior sampling has indicated the Wash is well-mixed at these locations. At Historic Lateral (LVW 5.3), Homestead (LVW 4.2) and Rainbow Gardens (LVW 3.5), three sampling points, equally spaced across the Wash (south bank, center, and north bank), are proposed because prior sampling indicates the Wash is less well-mixed at these locations. The specific sample locations will be finalized based on observations made during a field reconnaissance visit, health and safety requirements, and permissions for property access.

Please contact us should you have any questions regarding the recommended scope of Phase 3 RI Modification No. 10.

Attachments

- Table 1 High-Frequency Surface Water Sampling at Stream Gages in Las Vegas Wash
- Figure 1 Preliminary Las Vegas Wash Sampling Results February 2020
- Figure 2 Proposed High-Frequency Sampling Locations



Date:

Phase 3 RI Modification No. 10 High-Frequency Sampling in Las Vegas Wash

Nevada Environmental Response Trust (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, Inc., not individually, but solely in its representative capacity as the Nevada Environmental Response Trust Trustee Not Individually, but Solely Signature: as President of the 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 30/2020



Phase 3 RI Modification No. 10 High-Frequency Sampling in Las Vegas Wash

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

Responsible Certified Environmental Manager (CEM) for this project

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 provided 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.

John M. Pekala, PG

Principal

<u>April 30, 202</u>

Date

Certified Environmental Manager Ramboll US Corporation

CEM Certificate Number: 2347

CEM Expiration Date: September 20, 2020

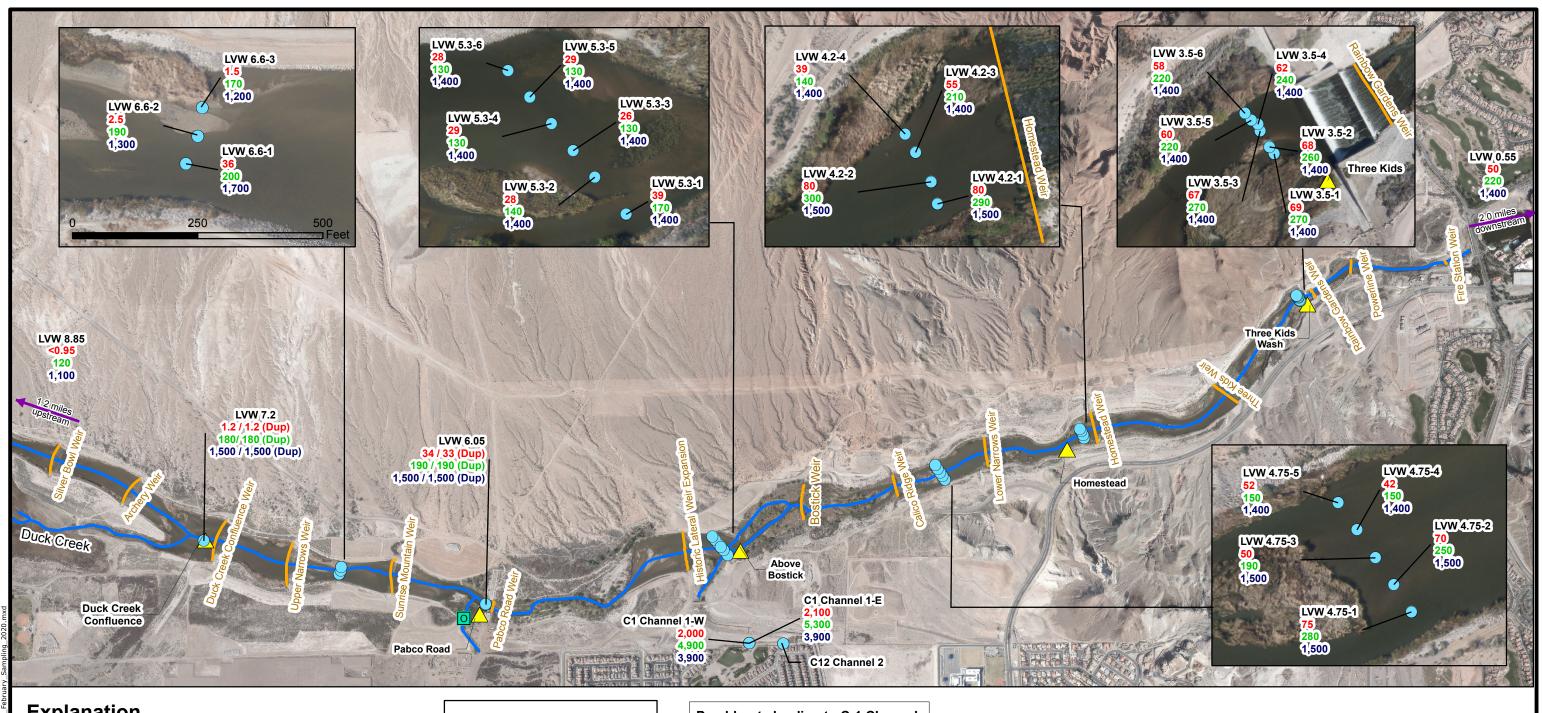
Table 1. High-Frequency Surface Water Sampling at Stream Gages in Las Vegas Wash

Phase 3 RI Modification No. 10

Nevada Environmental Response Trust Site; Henderson, Nevada

Transect Name	Transect ID	Number of Samples
Duck Creek	LVW 7.2	single sample transect
Pabco Road	LVW 6.05	single sample transect
Historic Lateral	LVW 5.3	3 sample transect
Homestead	LVW 4.2	3 sample transect
Rainbow Gardens	LVW 3.5	3 sample transect
Northshore Road	LVW 0.55	single sample transect

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Explanation

NERT Surface Water Sample

USGS Continuous Streamflow Location

NERT/AMPAC/TIMET/COH Outfall Location

— Weirs

Las Vegas Wash

LVW7.2 Sampling Location

ND<0.95 Perchlorate (µg/L)

77 Chlorate (µg/L)

1,300 TDS (mg/L)

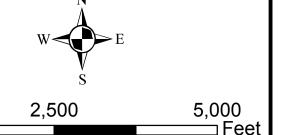
Perchlorate loading to C-1 Channel: 1.43 lb/day from C1 Channel 1-W

0.26 lb/day from C1 Channel 1-W

Notes:

Dup= Duplicate

ND= Not detected at or above laboratory reporting limit shown Samples were collected on 02-05-2020 and 02-06-2020 There was no flow at C12 Channel 2; no sample was collected





PRELIMINARY LAS VEGAS WASH SAMPLING RESULTS - February 2020

Nevada Environmental Response Trust Henderson, Nevada Figure 1

PROJECT: 1690011200



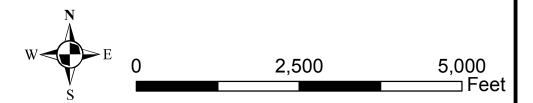
Explanation

NERT Surface Water Sample

NERT/AMPAC/TIMET/COH Outfall Location

— Weirs

Las Vegas Wash





PROPOSED HIGH-FREQUENCY SAMPLING LOCATIONS

Nevada Environmental Response Trust
Henderson, Nevada

Figure

2

PROJECT: 1690011200