

March 9, 2021

TECHNICAL MEMORANDUM

To: Steve Clough

Nevada Environmental Response Trust

From: John Pekala, CEM#2347, Expires 9/20/2022, Ramboll

Greg Kinsall, Ramboll

Re: Phase 3 RI Modification No. 12

Nevada Environmental Response Trust Site

Henderson, Nevada

Ramboll Project No. 1690020169-023

This Technical Memorandum presents Ramboll's recommended Modification No. 12 to the scope of work for the Phase 3 Remedial Investigation (RI) currently in progress at the Nevada Environmental Response Trust (NERT) Site (the "Site") located in Henderson, Nevada.

Phase 3 RI Modification No. 8, Revision 1, dated March 19, 2020, proposed field work necessary to address data gaps within NERT Operable Unit 3 (OU-3) that need to be resolved prior to the completion of the OU-3 RI. Modification No. 8 was approved by the Nevada Division of Environmental Protection (NDEP) on March 20, 2020. The OU-3 investigation was amended in late 2020 by the addition of five new wells to be installed north of the Seep Well Field as part of Phase 3 RI Modification No. 11. Modification No. 11 was submitted to NDEP on October 21, 2020 and was approved by NDEP on October 28, 2020. The Modification Nos. 8/11 scope of work includes a comprehensive round of groundwater sampling to be conducted throughout OU-3. The purpose of Modification No. 12 is to add three additional existing wells to the Modification Nos. 8/11 comprehensive groundwater sampling program. These wells were not originally included in the comprehensive sampling event because they had been sampled as part of Phase 3 RI Modification No.7. However, since access to Bureau of Reclamation and Clark County land has taken longer to acquire than originally anticipated, adding these wells to the comprehensive sampling event is appropriate.

Proposed Scope of Work

A total of three existing shallow alluvium wells (PC-200, PC-201, and PC-202) are proposed to be added to the upcoming Modification Nos. 8/11 comprehensive groundwater sampling program. These wells were previously installed as part of Phase 3 RI Modification No. 7 and have not been sampled since May 2020. The proposed Modification No. 12 additional wells are highlighted on Figure 1. The incorporation of these three wells into the upcoming comprehensive sampling event specified in Modifications 8 and 11 will provide a more comprehensive evaluation of groundwater quality in the western portion of OU-3.

Consistent with the approved Phase 3 RI Modification No. 8, Revision 1, dated March 19, 2020, groundwater samples collected from the three additional wells will be analyzed for perchlorate, chlorate, chromium, and chloroform. To characterize general groundwater

chemistry, groundwater samples will also be tested for general chemistry parameters. ¹ Consistent with Modifications 8 and 11, field parameters including temperature, pH, dissolved oxygen (DO), oxygen reduction potential (ORP), turbidity, and electrical conductivity (EC) will also be measured during sampling.

Please contact us should you have any questions regarding the recommended scope of Phase 3 RI Modification No. 12.

Attachments

Figure 1 Updated Investigation Locations in OU-3

¹ General chemistry parameters include total dissolved solids (TDS) and major ions (calcium, magnesium, sodium, potassium, sulfate, iron, nitrate, chloride, and bicarbonate/carbonate/hydroxide alkalinity).

Ramboll

Phase 3 RI Modification No. 12 Recommended Additional Investigation in Operable Unit 3

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, Inc., not individually, but solely in its representative capacity as the	
nevada Enviro	nmental 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
Date:	3/9/21



Phase 3 RI Modification No. 12 **Recommended Additional Investigation in Operable Unit 3**

Nevada Environmental Response Trust Site (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

Date

March 9, 2021

Principal

Certified Environmental Manager Ramboll US Consulting, Inc. CEM Certificate Number: 2347

CEM Expiration Date: September 20, 2022



