



January 15, 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: Contingency Plan for Utility Construction Activities Associated with the 2013 GWETS Optimization Project; Nevada Environmental Response Trust Site, Henderson, Nevada

Dear Mr. Dong,

This contingency plan has been prepared in accordance with the Site Management Plan (SMP)¹ for the Nevada Environmental Response Trust (NERT) Site (the "Site") in Henderson, Nevada. This contingency plan outlines procedures and equipment that ENVIRON International Corporation (ENVIRON) would use if damage is caused to any remediation system component in a manner that causes the release of untreated groundwater during the utility construction phase of the execution of the approved 2013 GWETS Optimization Work Plan.² In accordance with the SMP, preparation of a contingency plan is required prior to starting any activity within 50 feet of any *on-site* component of the groundwater monitoring, extraction, and treatment systems. Although not explicitly required by the SMP, work conducted within 50 feet of *off-site* monitoring, extraction, and treatment systems will also be managed under this contingency plan.

Anticipated Activities

As part of the 2013 Groundwater Extraction and Treatment System (GWETS) Optimization Project, ENVIRON is proposing to activate nine existing, currently idle extraction wells located in the Interceptor Well Field (IWF) and Athens Road Well Field (AWF) and perform additional well testing to further characterize hydraulic properties of the major hydrogeologic units at the Site. As part of the activation activities at the AWF, limited excavation and trenching will be required for the installation of sub-grade vaults and utility lines at wells ART-7B and PC-150. The exact configuration of utility lines will be determined during the forthcoming design phase. The work will be completed with the assistance of personnel from Envirogen Technologies, Inc. (Envirogen), the GWETS Operator, as well as ENVIRON subcontractors. Utility construction activities are described in more detail within the 2013 GWETS Optimization Work Plan.

Precautions

Utility construction and excavation associated with the activation of ART-7B and PC-150 will take place within City of Henderson (COH) property and, therefore, are not covered by soil disturbance requirements listed in the SMP. Trenching activities will not intersect the water table, which is approximately 30 feet below ground surface (bgs) in the vicinity of the AWF.³ However, excavated soils generated during trenching will be stockpiled during construction and used to backfill trenched

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

² ENVIRON. 2013. 2013 GWETS Optimization Work Plan, Revision 1, Nevada Environmental Response Trust Site, Henderson, Nevada. November 22. Approved by NDEP on December 4, 2013.

³ ENVIRON. 2013. Annual Remedial Performance Report for Chromium and Perchlorate, July 2012-June 2013, Nevada Environmental Response Trust Site, Henderson, Nevada. August 30, 2013. NDEP approved October 10, 2013.

areas in compliance with applicable COH requirements. Construction work will be performed by licensed contractors and no work will begin until utility plans have been released by the COH, following plan approval. Utility construction activities will conform to the specifications for public works construction and off-site improvements in Clark County, Nevada. This includes taking precautions to protect the construction site and adjacent properties from storm water run-off or material removed through trenching.

ENVIRON personnel and subcontractors will also implement the following precautions and procedures during utility construction:

- 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 ENVIRON field staff, ENVIRON subcontractors, and Envirogen operators will be confirmed. Clear lines of communication will be established each day to ensure a swift and coordinated response to a release. Shift changes and well testing schedules will be identified during these daily meetings.
- When possible, any work on existing GWETS infrastructure (e.g., installation of new GWETS connections, etc.) will be performed by the GWETS Operator, Envirogen. When the assistance of subcontractors is necessary, Envirogen will be asked to review the planned work prior to commencement of construction.
- New connections at the GWETS wells at ART-7B and PC-150 will be made within the well vault such that in the event of a release during installation, water would be contained within the well vault.
- Envirogen will operate existing pumps and equipment associated with the GWETS, as necessary.
- 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., backhoes) are performed near exposed wells or other exposed GWETS infrastructure.
- Storm drain inlet protection will be put in place as a precautionary measure if storm drains are present in the immediate vicinity of the utility construction area.
- Work areas will be delineated as necessary to avoid unauthorized entry during utility construction.
- Any startup/shutdown activities associated with the GWETS (e.g., temporary shutdown of extraction wells for new well tie-in) will be conducted in accordance with Envirogen’s Operation and Maintenance (O&M) manuals and lockout/tagout (LOTO) procedures. Only Envirogen will be allowed to perform startup and shutdown of GWETS equipment.

Response Procedures and Equipment

- The primary response action for a release of untreated groundwater during utility construction will be to shut down and contain any uncontrolled flow. Envirogen personnel will have primary responsibility for shutting down GWETS components.
- A spill response kit will be readily available during construction activities and utilized in the event of a release of untreated groundwater. The precautionary measures described in this contingency plan are intended to minimize the volume of a potential release; therefore, it is anticipated that the spill response kit will adequately contain potential releases from construction activities.
- As defined in the SMP, if utility construction results in the release of untreated groundwater, 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 and the Trust with a written explanation for the shutdown.

- If utility construction 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.

Please contact John Pekala at (602) 734-7710 or Allan DeLorme at (510) 420-2565 if you have any comments or questions concerning this Plan.

Sincerely,



John M. Pekala, PG
Senior Manager
CEM #2347, expires 9/20/2014



Allan J. DeLorme, PE
Principal

cc: BMI Compliance Coordinator, NDEP, BCA, Las Vegas
Brian Giroux, McGinley and Associates, Reno
NDEP c/o McGinley and Associates, Reno

ec: James Dotchin, NDEP
Greg Lovato, NDEP
Stephen Tyahla, USEPA
Nevada Environmental Response Trust
Tanya O'Neill, Foley & Lardner LLP
Joe McGinley, McGinley and Associates
Jeff Gibson, AMPAC
Mark Paris, BMI
Lee Farris, Landwell
Ranjit Sahu, BMI
Joe Kelly, Montrose

Paul Sundberg, Montrose
Curt Richards, Olin
Davis Share, Olin
Chuck Elmendorf, Stauffer
Nick Pogoncheff, Stauffer
George Crouse, Syngenta
David Hadzinsky, TIMET
Richard Truax, GEI Consultants
Kirk Stowers, Broadbent & Associates
Victoria Tyson, Tyson Contracting
Enoe Marcum, WAPA