



April 25, 2014

Compliance Coordinator
Nevada Division of Environmental Protection
Bureau of Water Pollution Control
901 South Stewart Street, Suite 4001
Carson City, Nevada 89701-5249

**Subject: Groundwater Discharge Permit NEV2001515 Discharge Monitoring Reports –
1st Quarter 2014**

Dear Compliance Coordinator:

The Nevada Environmental Response Trust (“NERT” or the “Trust”) maintains Groundwater Discharge Permit #NEV2001515 (the “Permit”), which covers the synthetically double-lined ponds GW-11 and AP-5 at the NERT site in Henderson, Nevada (the “NERT site”). During 1st quarter 2014, no water was discharged directly to a receiving water body from either GW-11 or AP-5. Treated water from the perchlorate treatment system at the NERT site is discharged to Las Vegas Wash pursuant to NPDES permit NV0023060. The groundwater extraction and treatment system at the NERT site is operated by Envirogen Technologies, Inc. (Envirogen).

Table 1 of the Permit indicates that monitoring of the leak detection systems in both GW-11 and AP-5 is required twice per month. The results of the 1st quarter 2014 leak detection monitoring are provided in Attachment 2. Due to a scheduling oversight, leak detection monitoring of AP-5 was only conducted once during the month of February 2014. Leak detection monitoring was performed twice per month in January and March 2014, as required.

The Trust is in the process of decommissioning the AP-5 pond. Activities related to the decommissioning are ongoing under the purview of NDEP Bureau of Corrective Actions. Please note that the AP-5 pond’s top liner has a tear at the top edge of the pond. The AP-5 pond is a synthetically double-lined pond. The split top liner has been sandbagged to prevent a strong breeze from lifting the edges and the top liner tear will be closely monitored. Liquid was detected during each of the five leak detection monitoring events conducted in 1st quarter (Attachment 2). The source of the liquid is unknown. The detected liquid was transferred to GW-11. There is no evidence that the underlying liner has been compromised.

ENVIRON notes that on March 27, 2014, the GW-11 pond began operating as an equalization basin for the treatment plant.

Attachment 1 includes the January, February, and March 2014 Discharge Monitoring Reports (DMRs). Attachment 2 includes the pond monitoring tables, which provide water balance and leak detection monitoring information.

Should you have any questions concerning this report, please contact John Pekala at (602) 734-7710 or jpekala@environcorp.com. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "John M. Pekala", with a long horizontal flourish extending to the right.

John M. Pekala, PG
Senior Manager
CEM 2347, exp. 9/20/14

Overnight Mail
Attachments

Attachment 1: Discharge Monitoring Reports
Attachment 2: Pond Monitoring Results

ec: Greg Lovato, Bureau of Corrective Actions, NDEP
James Dotchin, Bureau of Corrective Actions, NDEP
Weiquan Dong, Bureau of Corrective Actions, NDEP
Nevada Environmental Response Trust
Tanya O'Neill, Foley and Lardner LLP
Todd Webster, Envirogen Technologies, Inc.
Michael Delvecchio, Envirogen Technologies, Inc.
Allan J. DeLorme, ENVIRON International Corporation

Discharge Permit NEV2001515 – 1st Q 2014 DMR
CEM Certification

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
CEM 2347, expires 9-20-14

ATTACHMENT 1

Discharge Monitoring Reports



14-Jan DMR
NEV2001515.pdf

January 2014



14-Feb DMR
NEV2001515.pdf

February 2014



14-Mar DMR
NEV2001515.pdf

March 2014

PERMITTEE NAME/ADDRESS:

NAME: Nevada Environmental Response Trust
 ADDRESS: c/o Envirogen Technologies
 510 Fourth Street
 Henderson, NV 89015

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

NEV2001515	001
PERMIT NUMBER	DISCHARGE NUMBER

FACILITY: Nevada Environmental Response Trust
 LOCATION: Henderson, NV
 ATTN: John Pekala

MONITORING PERIOD

FROM 14 | 01 | 01 TO 14 | 01 | 31

NO DISCHARGE

NOTE: Read instructions before completing this form.

PARAMETER	SAMPLE MEASUREMENT / PERMIT REQUIREMENT	QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE	
		AVERAGE	MAXIMUM	UNITS	30 Day Ave (mg/l)	7 Day Ave (mg/l)	30 Day Ave (lb/day)	UNIT				
Flow Influent	SAMPLE MEASUREMENT	Please see attached Table 1			MGD	-----	-----	-----		0	Monthly	Flow Meter
	PERMIT REQUIREMENT	Monitor and Report				-----	-----	-----				
Leak Detection Information	SAMPLE MEASUREMENT	Please see attached Table 2a and 2b			gallons	-----	-----	-----		0	Bi-Monthly	Discrete -- Field Measurement
	PERMIT REQUIREMENT	Monitor and Report				-----	-----	-----				
Pond Water Level	SAMPLE MEASUREMENT	Please see attached Table 1			feet	-----	-----	-----		0	Bi-Monthly	Discrete -- Field Measurement
	PERMIT REQUIREMENT	Monitor and Report				-----	-----	-----				
Storage Volume	SAMPLE MEASUREMENT	Please see attached Table 1			gallons	-----	-----	-----		0	Bi-Monthly	Calculation
	PERMIT REQUIREMENT	-----	GW-11: 76,100,000 AP-5: 1,817,000			-----	-----	-----				
Discharge to FBR	SAMPLE MEASUREMENT	Please see attached Table 1			gallons	-----	-----	-----		0	Bi-Monthly	Flow Meter
	PERMIT REQUIREMENT	Monitor and Report				-----	-----	-----				
Water Balance Information	SAMPLE MEASUREMENT	Please see attached Table 1			gallons	-----	-----	-----		0	Monthly	Calculation
	PERMIT REQUIREMENT	Monitor and Report				-----	-----	-----				
	SAMPLE MEASUREMENT											
	PERMIT REQUIREMENT											

NAME / TITLE PRINCIPAL EXECUTIVE OFFICER

John M. Pekala

CEM 2347, exp 9-20-14

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY DIRECTION OR SUPERVISION IN ACCORDANCE WITH A SYSTEM DESIGNED TO ASSURE THAT QUALIFIED PERSONNEL PROPERLY GATHER AND EVALUATE THE INFORMATION SUBMITTED, BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION. THE INFORMATION SUBMITTED IS, TO THE BEST OF MY KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS.



SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE

602-734-7710

AREA CODE NUMBER

DATE

14 | 04 | 25

YEAR MO DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS
 Ponds GW-11 and AP-5

(Reference all attachments here)

Forms by WindowChem(707)864-0845;p/n11090;v5.01.4/1/96

PERMITTEE NAME/ADDRESS:

NAME: Nevada Environmental Response Trust
 ADDRESS: c/o Envirogen Technologies
 510 Fourth Street
 Henderson, NV 89015

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

NEV2001515	001
PERMIT NUMBER	DISCHARGE NUMBER

FACILITY: Nevada Environmental Response Trust
 LOCATION: Henderson, NV
 ATTN: John Pekala

MONITORING PERIOD

FROM 14 | 02 | 01 TO 14 | 02 | 28

NO DISCHARGE

NOTE: Read instructions before completing this form.

PARAMETER		QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
		AVERAGE	MAXIMUM	UNITS	30 Day Ave (mg/l)	7 Day Ave (mg/l)	30 Day Ave (lb/day)	UNIT			
Flow Influent	SAMPLE MEASUREMENT	Please see attached Table 1		MGD	-----	-----	-----		0	Monthly	Flow Meter
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Leak Detection Information	SAMPLE MEASUREMENT	Please see attached Table 2a and 2b		gallons	-----	-----	-----		0	Bi-Monthly	Discrete -- Field Measurement
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Pond Water Level	SAMPLE MEASUREMENT	Please see attached Table 1		feet	-----	-----	-----		0	Bi-Monthly	Discrete -- Field Measurement
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Storage Volume	SAMPLE MEASUREMENT	Please see attached Table 1		gallons	-----	-----	-----		0	Bi-Monthly	Calculation
	PERMIT REQUIREMENT	-----	GW-11: 76,100,000 AP-5: 1,817,000		-----	-----	-----				
Discharge to FBR	SAMPLE MEASUREMENT	Please see attached Table 1		gallons	-----	-----	-----		0	Bi-Monthly	Flow Meter
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Water Balance Information	SAMPLE MEASUREMENT	Please see attached Table 1		gallons	-----	-----	-----		0	Monthly	Calculation
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME / TITLE PRINCIPAL EXECUTIVE OFFICER

John M. Pekala

CEM 2347, exp 9-20-14

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY DIRECTION OR SUPERVISION IN ACCORDANCE WITH A SYSTEM DESIGNED TO ASSURE THAT QUALIFIED PERSONNEL PROPERLY GATHER AND EVALUATE THE INFORMATION SUBMITTED, BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION, THE INFORMATION SUBMITTED IS, TO THE BEST OF MY KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS.

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE

602-734-7710

AREA CODE NUMBER

DATE

14 | 04 | 25

YEAR MO DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS
 Ponds GW-11 and AP-5

(Reference all attachments here)

Forms by WindowChem(707)864-0845;p/n11090;v5.01;4/1/96

PERMITTEE NAME/ADDRESS:

NAME: Nevada Environmental Response Trust
 ADDRESS: c/o Envirogen Technologies
 510 Fourth Street
 Henderson, NV 89015

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

NEV2001515	001
PERMIT NUMBER	DISCHARGE NUMBER


FACILITY: Nevada Environmental Response Trust
 LOCATION: Henderson, NV
 ATTN: John Pekala

MONITORING PERIOD							
FROM	14	03	01	TO	14	03	31

NO DISCHARGE

NOTE: Read instructions before completing this form.

PARAMETER	SAMPLE MEASUREMENT / PERMIT REQUIREMENT	QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE	
		AVERAGE	MAXIMUM	UNITS	30 Day Ave (mg/l)	7 Day Ave (mg/l)	30 Day Ave (lb/dav)	UNIT				
Flow Influent	SAMPLE MEASUREMENT	Please see attached Table 1			MGD	-----	-----	-----		0	Monthly	Flow Meter
	PERMIT REQUIREMENT	Monitor and Report				-----	-----	-----				
Leak Detection Information	SAMPLE MEASUREMENT	Please see attached Table 2a and 2b			gallons	-----	-----	-----		0	Bi-Monthly	Discrete -- Field Measurement
	PERMIT REQUIREMENT	Monitor and Report				-----	-----	-----				
Pond Water Level	SAMPLE MEASUREMENT	Please see attached Table 1			feet	-----	-----	-----		0	Bi-Monthly	Discrete -- Field Measurement
	PERMIT REQUIREMENT	Monitor and Report				-----	-----	-----				
Storage Volume	SAMPLE MEASUREMENT	Please see attached Table 1			gallons	-----	-----	-----		0	Bi-Monthly	Calculation
	PERMIT REQUIREMENT	-----	GW-11: 76,100,000 AP-5: 1,817,000			-----	-----	-----				
Discharge to FBR	SAMPLE MEASUREMENT	Please see attached Table 1			gallons	-----	-----	-----		0	Bi-Monthly	Flow Meter
	PERMIT REQUIREMENT	Monitor and Report				-----	-----	-----				
Water Balance Information	SAMPLE MEASUREMENT	Please see attached Table 1			gallons	-----	-----	-----		0	Monthly	Calculation
	PERMIT REQUIREMENT	Monitor and Report				-----	-----	-----				
	SAMPLE MEASUREMENT											
	PERMIT REQUIREMENT											

NAME / TITLE PRINCIPAL EXECUTIVE OFFICER	<small>I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY DIRECTION OR SUPERVISION IN ACCORDANCE WITH A SYSTEM DESIGNED TO ASSURE THAT QUALIFIED PERSONNEL PROPERLY GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION, THE INFORMATION SUBMITTED IS, TO THE BEST OF MY KNOWLEDGE AND BELIEF, TRUE, ACCURATE, AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS.</small>	 SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	TELEPHONE	DATE
John M. Pekala CEM 2347, exp 9-20-14 TYPED OR PRINTED			602-734-7710	14 04 25

COMMENT AND EXPLANATION OF ANY VIOLATIONS
 Ponds GW-11 and AP-5
 (Reference all attachments here)

Forms by WindowChem(707)864-0845;p/n11090;v5.01;4/1/96

ATTACHMENT 2

Pond Monitoring Results



GW-11 Pond Volume Model Version 1.2 20`
GW-11 & AP-5 Pond Data_Q1 2014.pdf

GW-11 Pond Data



KMG Field Sheet thru
4-24-14 kpl.xls

GW-11 Water Balance



GW-11 & AP-5 Pond
Data_Q1 2014.pdf

AP-5 Pond Data



O&M Manual - OnM Manual for NEV
NEV2001515 - 11-9-12001516 - Sept 2006.

Operations and Maintenance Manuals

ATTACHMENT 2

Pond Monitoring Results

During the 3rd quarter 2013, ENVIRON reviewed the volume calculations for GW-11 to verify its storage volume. Table 1 of the Permit, "Holding Pond Limitations for AP-5 and GW-11," indicates that the maximum storage volume of GW-11 is 70,000,000 gallons; however, ENVIRON determined that the maximum storage volume is approximately 76,100,000 gallons. In a letter to NDEP on September 12, 2013, ENVIRON requested a minor modification of the Permit to reflect the revised GW-11 maximum storage volume. In a letter dated October 7, 2013, NDEP concurred with the maximum volume of 76,100,000 gallons at zero feet of freeboard and indicated that the maximum volume corresponds to an operating volume of 62,400,000 gallons at 3.0 feet of freeboard. A modification to the permit based on the revised GW-11 volume calculations will be addressed during the Permit renewal process in 2016.

Table 1 – GW-11 Pond Level and Storage Volume

Date	Flow Into GW-11 (MGD)	Pond Water Level (vertical depth in feet)	Storage Volume (thousand gallons)	Discharge to FBRs (million gallons)	Water Balance (million gallons)
1-1-14	0.030	13.48	46,836	1.52 (1/1/14 - 1/15/14)	-1.61
1-15-14		13.42	46,582	1.91 (1/15/14 - 1/31/14)	
2-1-14	0.029	13.11	45,230	1.70 (2/1/14 - 2/15/14)	-1.85
2-13-14		12.93	44,472	1.51 (2/15/14 - 2/28/14)	
3-1-14	0.248	12.67	43,384	1.46 (3/1/14 - 3/15/14)	-2.85
3-14-14		12.54	42,825	6.44 (3/15/14 - 3/31/14)	

Notes:

MGD = million gallons per day

Table 2a – GW-11 Pond Leak Detection Monitoring

Date	Volume in Detection Wells (gallons)
1-1-14	NW – Dry
“	NE – Dry
“	SW – Dry
“	SE – Dry
1-15-14	NW – Dry
“	NE – Dry
“	SW – Dry
“	SE – Dry
2-1-14	NW – Dry
“	NE – Dry
“	SW – Dry
“	SE – Dry
2-15-14	NW – Dry
“	NE – Dry
“	SW – Dry
“	SE – Dry
3-1-14	NW – Dry
“	NE – Dry
“	SW – Dry
“	SE – Dry
3-15-14	NW – Dry
“	NE – Dry
“	SW – Dry
“	SE – Dry

Table 2b – AP-5 Pond Leak Detection Monitoring

Date	Volume in Detection Well (gallons)
1-15-14	25.5
1-30-14	28.5
2-14-14	30
2-15-14 to 2-28-14	Not monitored
3-5-14	27.5
3-21-14	26