



November 14, 2014

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

RE: Report of Spill of Treated Groundwater from Gasket on Effluent Discharge Pipeline
NPDES Permit NV0023060
Incident No. 141112-03

Dear Compliance Coordinator:

The Nevada Environmental Response Trust ("NERT" or the "Trust") maintains a National Pollutant Discharge Elimination System (NPDES) Permit NV0023060 for discharge of treated water to the Las Vegas Wash as part of their on-going effort to capture and treat groundwater containing perchlorate and other contaminants of concern at the NERT site in Henderson, Nevada (the "Site"). Tetra Tech is submitting this letter on behalf of the Trust to provide written documentation of a spill from the treated groundwater effluent line at the Site that runs from the treatment plant to the discharge point at the wash.

On November 12, 2014 at approximately 2:00 AM PST, Envirogen Technologies Inc. (ETI), the operator of the groundwater extraction and treatment system (GWETS), received a call from Tronox security to notify them that a gasket on a fitting in the effluent line was leaking. The ETI operator immediately responded to the site and attempted to stop the leak by tightening bolts on the fitting. When this did not stop the leak, ETI stopped discharging treated water down the effluent pipe and directed the treated effluent to GW-11, a large storage pond at the Site. This diversion occurred at approximately 2:30 AM PST. ETI personnel were able to make the necessary repairs by approximately 9:00 AM PST; at which time, they stopped diverting the water and returned to discharging effluent to the wash. During the period of diversion, approximately 321,860 gallons of effluent were diverted to GW-11. There was no measurable increase in the pond level and the available storage remains at approximately 13.8 days. The pond is currently at 68% of the permitted capacity.

The incident was also reported via telephone at approximately 1:15 PM PST on November 12, 2014 to the NDEP Spill Notification Line (report taken by Mr. David Friedman and assigned Spill Incident No. 141112-03). The Bureau of Corrective Actions was notified through the Spill Notification Line, and also discussed the incident with Tetra Tech later in the afternoon of November 12, 2014.

Per Section II.A.3.b. of the NPDES permit, a written report shall be submitted within 5 days of the spill and include the following information.

i. Time and date of discharge

The leak was reported to ETI at approximately 2:00 AM PST on November 12, 2014. The exact time that the leak started is unknown.

ii. Exact location and estimated amount of discharge

The discharge occurred at the Site near a recently repaired wye from the pig launcher on the treated effluent line at the equalization area of the GWETS. The leak was likely flowing at up to 2 gpm for less than 12 hours. Therefore, the maximum volume of treated water released was less than 1,500 gallons,

but appeared to be about 1,000 gallons based on the amount of wet soil observed in the area. The release never reached any drainages or waterways.

iii. Flow path and any bodies of water which the discharge reached

The release was absorbed into the soil and never reached any drainages or waterways.

iv. The specific cause of the discharge

A gasket near the recently repaired wye was not seating properly and caused the leak.


v. The preventive and/or corrective actions taken

An ETI maintenance employee evaluated and repaired the gasket. ETI began discharging back to the Las Vegas Wash by 9:00 AM PST.

Please let me know if you have any questions. I can be reached at 720-931-9372 or via email at frank.johns@tetrattech.com.

Sincerely,

Tetra Tech, Inc.



Frank J Johns, II
Vice President and Principal Engineer

Copies: Regional Administrator, USEPA Region 9

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