

April 26, 2016

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 Report – 1st Quarter 2016**

Dear Compliance Coordinator:

The Nevada Environmental Response Trust (NERT or Trust) maintains Groundwater Discharge Permit #NEV2001515 (Permit), which covers the synthetically double-lined ponds GW-11 and AP-5 at the NERT site in Henderson, Nevada. During the 1st quarter 2016, no water was discharged directly to a receiving water body from either GW-11 or AP-5. Treated water from a groundwater extraction and treatment system (GWETS) at the NERT Site, which treats extracted groundwater for perchlorate, is discharged to Las Vegas Wash pursuant to NPDES Permit #NV0023060. The GWETS is operated by Envirogen Technologies Inc. (ETI).

AP-5

The Trust is in the process of decommissioning the AP-5 Pond. Activities related to decommissioning are overseen by the Nevada Division of Environmental Protection (NDEP), Bureau of Industrial Site Cleanup. In the interim, water is periodically added to keep the pond solids moist (Table 1b).

Leakage rate testing in the single leak detection sump serving the AP-5 Pond resumed during the 1st quarter 2016 following installation of a new pump. Standard operating procedures for leakage rate testing were provided to NDEP by the Trust in an attachment to a letter to NDEP dated July 24, 2015. NERT suspended access on the AP-5 Pond liner and berm due to potential safety concerns. Pond water level measurements, therefore, were not conducted during the 1st quarter 2016. Pond water level measurements resumed on April 4, 2016, following clearance to access the berm portion of the pond.

GW-11

Liquid was detected in three of four GW-11 corner leak detection wells during the 1st quarter 2016. The southeast corner well detected no leakage during the quarter. Currently, pumps do not reach the bottoms of the northwest and southwest detection wells. The Trust and ETI are evaluating alternatives to re-position the northwest and southwest pumps. The pump in the northeast detection well was re-positioned on March 31, 2016, approximately 20 feet lower than its former position. The northeast detection well now is believed to have a pump in position approximately at the bottom of the well.

Attachment 1 provides January, February, and March 2016 Discharge Monitoring Reports (DMRs). Attachment 2 provides pond monitoring tables with water balance and leak detection monitoring information. This DMR also

provides corrected data from transcription errors for the GW-11 pond water levels reported with the 2nd quarter 2015 DMR and for several GW-11 leak detection values reported with the 3rd quarter 2015 DMR.

Please contact me at (702) 966-8340 or kyle.hansen@tetratech.com for any questions regarding this report.

Sincerely,

Tetra Tech, Inc.



Kyle Hansen, CEM
Field Operations Manager/Geologist
CEM 2167, exp. 9/18/16
Overnight Mail

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

cc: Greg Lovato, Bureau of Corrective Actions, NDEP
James Dotchin, Bureau of Corrective Actions, NDEP
Weiquan Dong, Bureau of Corrective Actions, NDEP
Nikita Lingenfelter, Bureau of Water Pollution Control, 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, Ramboll Environ
John Pekala, Ramboll Environ
Derek Amidon, Tetra Tech, Inc.

**Discharge Permit NEV2001515 – 1st Quarter 2016 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.



Kyle S. Hansen
CEM 2167, expires 9-18-16

ATTACHMENT 1

Discharge Monitoring Reports

January 2016

February 2016

March 2016

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: Kyle Hansen

MONITORING PERIOD							
FROM:	16	01	01	TO:	16	01	31

NO DISCHARGE: X

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	See attached Tables 1a and b		MGD	-----	-----	-----		0	Monthly	Flow Meter
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Leak Detection Information	SAMPLE MEASUREMENT	See attached Tables 2a and b		gallons	-----	-----	-----		0	Bi-Monthly	Discrete-Field Measurement
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Pond Water Level	SAMPLE MEASUREMENT	See attached Tables 1a and b		feet	-----	-----	-----		0	Bi-Monthly	Discrete-Field Measurement
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Storage Volume	SAMPLE MEASUREMENT	See attached Tables 1a and b		gallons	-----	-----	-----		0	Bi-Monthly	Calculation
	PERMIT REQUIREMENT		GW-11: 76,100,000 AP-5: 1,817,000		-----	-----	-----				
Discharge to FBR	SAMPLE MEASUREMENT	See attached Tables 1a and b		gallons	-----	-----	-----		0	Bi-Monthly	Flow Meter
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Water Balance Information	SAMPLE MEASUREMENT	See attached Tables 1a and b		gallons	-----	-----	-----		0	Monthly	Calculation
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME / TITLE PRINCIPAL EXECUTIVE OFFICER
Kyle Hansen
 CEM 2167, exp 9-18-16
 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.

Kyle J. Hansen
 SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE: 702-966-8340
 DATE: 16 | 04 | 20
 AREA CODE NUMBER: 702
 YEAR MO DAY

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

(Reference all attachments here)

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
 PERMIT NUMBER

001
 DISCHARGE NUMBER

FACILITY: Nevada Environmental Response Trust
 LOCATION: Henderson, NV
 ATTN: Kyle Hansen

MONITORING PERIOD
 FROM: 16 | 02 | 01 TO: 16 | 02 | 29

NO DISCHARGE: X

NOTE: Read instructions before completing this form.

PARAMETER	X	QUANTITY OR LOADING			QUALITY OR CONCENTRATION				NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
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Leak Detection Information	SAMPLE MEASUREMENT	See attached Tables 2a and b		gallons	-----	-----	-----		0	Bi-Monthly	Discrete-Field Measurement
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Pond Water Level	SAMPLE MEASUREMENT	See attached Tables 1a and b		feet	-----	-----	-----		0	Bi-Monthly	Discrete-Field Measurement
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Storage Volume	SAMPLE MEASUREMENT	See attached Tables 1a and b		gallons	-----	-----	-----		0	Bi-Monthly	Calculation
	PERMIT REQUIREMENT		GW-11: 76,100,000 AP-5: 1,817,000		-----	-----	-----				
Discharge to FBR	SAMPLE MEASUREMENT	See attached Tables 1a and b		gallons	-----	-----	-----		0	Bi-Monthly	Flow Meter
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Water Balance Information	SAMPLE MEASUREMENT	See attached Tables 1a and b		gallons	-----	-----	-----		0	Monthly	Calculation
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME / TITLE PRINCIPAL EXECUTIVE OFFICER
Kyle Hansen
 CEM 2167, exp 9-18-16
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Kyle Hansen
 SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE: 702-966-8340
 DATE: 16 | 04 | 20
AREA CODE NUMBER YEAR MO DAY

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

(Reference all attachments here)

PERMITTEE NAME/ADDRESS:

NAME: Nevada Environmental Response Trust
 ADDRESS: c/o Envirogen Technologies
 510 Fourth Street
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NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

NEV2001515
 PERMIT NUMBER

001
 DISCHARGE NUMBER

FACILITY: Nevada Environmental Response Trust
 LOCATION: Henderson, NV
 ATTN: Kyle Hansen

MONITORING PERIOD

FROM: 16 | 03 | 01 TO: 16 | 03 | 31

NO DISCHARGE:

NOTE: Read instructions before completing this form.

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Leak Detection Information	SAMPLE MEASUREMENT	See attached Tables 2a and b		gallons	-----	-----	-----		0	Bi-Monthly	Discrete-Field Measurement
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Pond Water Level	SAMPLE MEASUREMENT	See attached Tables 1a and b		feet	-----	-----	-----		0	Bi-Monthly	Discrete-Field Measurement
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Storage Volume	SAMPLE MEASUREMENT	See attached Tables 1a and b		gallons	-----	-----	-----		0	Bi-Monthly	Calculation
	PERMIT REQUIREMENT	-----	GW-11: 76,100,000 AP-5: 1,817,000			-----	-----				
Discharge to FBR	SAMPLE MEASUREMENT	See attached Tables 1a and b		gallons	-----	-----	-----		0	Bi-Monthly	Flow Meter
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
Water Balance Information	SAMPLE MEASUREMENT	See attached Tables 1a and b		gallons	-----	-----	-----		0	Monthly	Calculation
	PERMIT REQUIREMENT	Monitor and Report			-----	-----	-----				
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

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Kyle Hansen
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SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE: 702-966-8340
 DATE: 16 | 04 | 20
 AREA CODE NUMBER: 702
 YEAR MO DAY

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

(Reference all attachments here)

ATTACHMENT 2

Pond Monitoring Results

1st Quarter 2016

Corrections to 2nd Quarter 2015 GW-11 Pond Water Level Data

Corrections to 3rd Quarter 2015 GW-11 Pond Leak Detection Data

Pond Monitoring Results

Table 1a – 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)
1/11/16	1.34	12.92	44,444	21.17 (01/01/16 - 01/16/16)	-0.2
1/25/16		12.90	44,332	18.91 (01/16/16 - 01/31/16)	
2/12/16	1.29	12.85	44,109	18.65 (02/01/16 - 02/14/16)	-0.6
2/23/16		12.71	43,551	19.91 (02/14/16 - 02/29/16)	
3/8/16	0.11 ¹	12.86	44,165	1.23 (03/01/16 - 03/16/16)	0.1
3/24/16		12.77	43,774	0.00 (03/16/16 - 03/31/16)	

MGD = million gallons per day
¹Due a boatman bug outbreak on GW-11, extraction well flows bypassed GW-11 and were directed to the fluidized bed reactors, beginning March 2, 2016.

Table 1b – AP-5 Pond Monitoring Information

Date	Flow Into Pond ¹ (MGD)	Pond Level ^{2, 3} (vertical depth in feet and inches)	Storage Volume (thousand gallons)	Discharge to FBRs (gallons)	Water Balance (million gallons)
01/2016	0.004	NA	NA	0	0.08
		NA	NA	0	
02/2016	0.003	NA	NA	0	0.02
		NA	NA	0	
03/2016	0.003	NA	NA	0	-0.03
		NA	NA	0	

¹The AP-5 pond is in the process of being decommissioned. There is no routine flow into or out of AP-5 except to keep the solids moist. The flow into AP-5 has been expressed as a rate, per the requirements of Table 1 of the permit.
²The depth includes pond solids and added water.
³No volume measurements were collected in Q1 2016. Volume measurement was suspended on October 27, 2015, due to safety concerns that perchlorate residuals could be present on the liner. Volume measurements resumed on April 4, 2016 and will be reported in the Q2 2016 DMR.

Table 2a – GW-11 Pond Leak Detection Monitoring

Dates ¹	Volume in Detection Wells (gallons)
01/13/16 – 01/15/16	NW – 0
“	NE – 0
“	SW – 0
“	SE – 0
01/26/16 – 01/28/16	NW – 26
“	NE – 0
“	SW – 399
“	SE – 0
02/10/16 – 02/12/16	NW – 0
“	NE – 0
“	SW – 997
“	SE – 0
02/23/16 – 02/25/16	NW – 45
“	NE – 0
“	SW – 0
“	SE – 0
03/10/16 – 03/12/16	NW – 0
“	NE – 0
“	SW – 0
“	SE – 0
03/24/16 – 03/26/16	NW – 29
“	NE – 211
“	SW – 0
“	SE – 0

¹Twice monthly pumping activities occurred over a 3-day period to evaluate the leakage rates in GW-11, in accordance with procedures specified in a letter to NDEP-BWPC, dated May 28, 2015. The procedure is comprised of the following: days 1 and 2 consist of pumping the well contents dry. Day 3 provides the monitoring day for the gallons per day recharge rate. The value reported here represents the cumulative volume pumped during all 3 days. During the reporting period, the leakage rate did not exceed 125 gallons/acre/day.

Table 2b – AP-5 Pond Leak Detection Monitoring

Date	Volume in Detection Well (gallons)
01/18/16 ¹	72
01/26/16 – 01/28/16	308
02/10/16 – 02/12/16	197
02/23/16 – 02/25/16	321
03/10/16 – 03/12/16	244
03/24/16 – 03/26/16	273

²NERT temporarily suspended leakage rate testing in AP-5, which was documented in a letter to NDEP-BWPC, dated July 24, 2015. Leakage rate testing resumed with new pump equipment on January 18, 2016. Twice monthly pumping activities occurred over a 3-day period to evaluate the leakage rates in AP-5, following the initial January 18, 2016, pumping event. The 3-day evaluation is consistent with the method used for the GW-11 Pond: days 1 and 2 consist of pumping the well contents dry. Day 3 provides the monitoring day for the gallons per day recharge rate. The value reported here represents the cumulative volume pumped during all 3 days. During the reporting period, the leakage rate did not exceed 125 gallons/acre/day.

Table 3a – Corrected Q2 2015 GW-11 Pond Level and Storage Volume

Date	Flow Into GW-11 (MGD)	Corrected Pond Water Level (vertical depth in feet)	Storage Volume (thousand gallons)	Discharge to FBRs (million gallons)	Water Balance (million gallons)
4/10/15	1.19	14.1	49,657	17.07 (04/1/15 - 04/15/15)	0.1
4/18/15		14.1	49,542	19.73 (04/15/15 - 04/30/15)	
5/15/15	1.27	13.9	48,627	19.28 (05/1/15 - 05/15/15)	-1.3
5/28/15		13.8	48,058	20.44 (05/15/15 - 05/30/15)	
6/11/15	1.18	13.7	47,888	18.95 (06/1/15 - 06/15/15)	-0.2
6/25/15		13.9	48,400	17.96 (06/15/15 - 06/30/15)	

Table 3b – Corrected Q3 2015 GW-11 Pond Leak Detection Monitoring

Dates	Volume in Detection Wells (gallons)
7/16/15 – 7/18/15	NW – 36
“	NE – 38
“	SW – 1556
“	SE – 89
7/29/15 – 7/31/15	NW – 4
“	NE – 0
“	SW – 1029
“	SE – 111
8/11/15 – 8/13/15	NW – 0
“	NE – 0
“	SW – 0
“	SE – 102
8/25/15 – 8/27/15	NW – 3
“	NE – 3
“	SW – 0

Dates	Volume in Detection Wells (gallons)
“	SE – 72 Corrected
9/10/15 – 9/12/15	NW – 0
“	NE – 0
“	SW – 182 Corrected
“	SE – 49
9/22/15 – 9/24/15	NW – 0
“	NE – 0
“	SW – 451 Corrected
“	SE – 104 Corrected