

***Sent Via Federal Express and Email***

Weiquan Dong, PE  
Bureau of Industrial Site Clean-up  
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**SMP-REQUIRED NOTIFICATIONS, CONTINGENCY PLAN, AND  
CONSTRUCTION MITIGATION MEASURES PLAN; GATE INSTALLATION;  
NEVADA ENVIRONMENTAL RESPONSE TRUST SITE; HENDERSON,  
NEVADA**

Dear Mr. Dong,

On behalf of the Nevada Environmental Response Trust (NERT or the Trust), Ramboll Environ US Corporation (Ramboll Environ) is pleased to present these notifications, Contingency Plan, and Construction Mitigation Measures Plan for the planned soil-disturbing field activities to be performed by S&B Christ Consulting, LLC (SBCC) and their construction contractor that will take place during installation of a new gate within existing fencing at the NERT site (the "site") in Henderson, Nevada. This document has been prepared in accordance with the Site Management Plan, Revision 2<sup>1</sup> (SMP). The Trust has been advised of and approves of this document. Approval of this document by the Nevada Division of Environmental Protection (NDEP) is required prior to initiating the soil-disturbing activities described herein.

This document addresses the following notifications and requirements of the SMP:

- Sections 3.1 and various subsections of Sections 4 and 5 require notification to NDEP and the Trust of activities where site workers could potentially come in contact with contaminated soil or groundwater and for soil-disturbing and other on-site activities.

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<sup>1</sup> Ramboll Environ. 2015. Site Management Plan, Revision 2, Nevada Environmental Response Trust Site, Henderson, Nevada. July 17. Approved by NDEP August 8, 2015.

- Section 4.3 requires submittal of a contingency plan to NDEP and the Trust for approval, describing actions to be taken if previously unknown contaminated soil is encountered.
- Section 4.4 requires submittal of a Construction Mitigation Measures Plan to NDEP and the Trust for approval, describing mitigation measures to be followed to address potential construction-related impacts during earthwork or construction activities.
- Section 4.7 of the SMP describes notifications and procedures to follow in the event of an emergency project related to an accidental spill or release.

### **Background Information**

Ramboll Environ has subcontracted with SBCC to perform general contracting for the removal of a portion of the existing fence and construction of a gate located along the western boundary of the Tronox-leasehold at the site.<sup>2</sup> Specifically, the fence is located adjacent to the west of Tronox's laboratory facilities, along the Tronox facility road located north of Avenue F and generally aligned with 5<sup>th</sup> Street. The proposed gate will be used to provide access between Tronox leasehold property and 4<sup>th</sup> Street, through non-Tronox-leased NERT property, so that large vehicles and construction equipment can access the northern portion of the Tronox-leasehold without having to drive through the Tronox main entrance gate and facility area.

### **Anticipated Activities**

The gate to be constructed is planned to consist of two 20 ft wide swing-gates, for a total opening of approximately 40 ft. Small quantities of soil will be excavated during gate construction to install shallow concrete footings for new fence posts. The excavation of soil for the concrete footings will not commence until this document has been approved by NDEP. The proposed gate construction activities will not be conducted within any excavation control area (ECA) or within 50 feet of any on-site groundwater extraction and treatment system (GWETS) component.

### **Previously Unknown Contaminated Soil Contingency Plan**

Per Section 4.3 of the SMP, in the event that any soil is encountered that is visibly stained, discolored, shiny, or oily, or that has a noticeable solvent- or hydrocarbon-like odor or if buried debris is encountered that appears to be a part of a significant disposal practice, SBCC or the construction contractor will stop work and notify Ramboll Environ. If the previously unknown contaminated soil appears to be greater than *de minimis* contamination (i.e., greater than one cubic yard), Ramboll Environ will then notify NDEP and the Trust within 24 hours and, if required, call the NDEP 24-Hour Spill Notification Line. As described in Section 4.3 of the SMP, Ramboll Environ will collect a sample(s) of the soil as needed to characterize the potentially impacted soil.

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<sup>2</sup> The removal of the existing fence is not a soil-disturbing activity subject to the requirements of the SMP; however, the construction of the gate is anticipated to disturb soil and is subject to the requirements of the SMP. This document pertains to the gate construction activities.

Sampling and further characterization and handling of the potentially impacted soil will be managed as described in Section 4.3 of the SMP. If a *de minimis* amount (i.e., less than one cubic yard) of previously unknown contaminated soil is discovered, only the Trust will be notified and additional investigation and/or remedial actions will be taken if required by the Trust, per Section 4.3 of the SMP.

### **Construction Impact Mitigation Measures**

As described in Section 4.4 of the SMP, measures must be implemented to mitigate the potential impacts of the following activities:

- Dust generation associated with soil excavation and loading activities, construction or transportation equipment traveling over on-site soil, and wind traversing soil stockpiles that potentially contain contaminants of potential concern;
- Tracking of soil off the site on the wheels or bodies of construction or transportation vehicles or equipment; and
- Transporting of sediments from the site in surface water run-off.

Under the direction of SBCC, the construction contractor will implement the following mitigation measures to control the potential impacts of these activities.

#### Dust Mitigation

Dust mitigation measures will be implemented during soil-disturbing activities at the project area to minimize dust generation in compliance with applicable Clark County Department of Air Quality (DAQ) regulations and the NERT Site-Wide Dust Control Work Plan. At a minimum, the following dust control measures will be implemented by the contractor:

- Limit vehicle speeds on unpaved or off-road areas to 5 miles per hour;
- Control excavation activities and the pace or speed of work;
- Minimize drop heights during excavation or loading activities; and
- Utilize water trucks (or water tanks/sprayers mounted on support trucks or trailers) to conduct wet suppression at areas where work activities have the potential to generate significant dust.

#### Track-Out Mitigation and Equipment Decontamination

Tracking of soils outside of the work area will be mitigated by equipment and vehicle decontamination. In general, dry decontamination methods will be used including brushing,

scraping, or vacuuming of equipment bodies, wheels or treads, and vehicle tires. Scrapings will be maintained within the work area.

Close attention will be paid to the effectiveness of dry decontamination methods, and if dry methods are not effective (for example: due to wet or muddy conditions), wet decontamination methods, including pressure washing or steam cleaning, will be employed. Any wet decontamination will be performed within the work area, and rinse water will be contained within these areas.

#### Surface Water Run-Off Mitigation

Since this construction project will not affect an area greater than one acre, a Notice of Intent (NOI) to NDEP for coverage under the Construction Storm Water General Permit NVR100000 will not be required.

#### **Emergency Projects**

In the event of an accidental spill or release that could qualify as an emergency project, Ramboll Environ will notify NDEP and the Trust and, if required, prepare an Emergency Project notification for approval by NDEP. Upon approval of the Emergency Project status by NDEP, a work plan for clean-up will be prepared and submitted in general accordance with Section 4.7 of the SMP.

#### **Request for Approval**

This notification, Contingency Plan, and Construction Mitigation Measures Plan provides information required by the SMP for implementation of the gate construction at the NERT site. Your review and approval of this document is requested and appreciated. Ramboll Environ will address any concerns you have regarding the information herein, so that NDEP approval of this document can be provided prior to initiation of soil-disturbing activities.

#### **Closure**

We would appreciate your prompt review and approval of this document. Please contact John Pekala at (602) 734-7710 or [jpekala@ramboll.com](mailto:jpekala@ramboll.com) if you have any comments or questions concerning this document.


Yours sincerely,



**John M. Pekala, PG**

Senior Manager

CEM #2347, expires 9/20/2016



**Allan J. DeLorme, PE**

Principal

cc: BMI Compliance Coordinator, NDEP, BISC, Las Vegas

ec: James Dotchin, NDEP  
Nevada Environmental Response Trust  
Tanya O'Neill, Foley and Lardner LLP