

Hazardous Waste Management Plan Nevada Environmental Response Trust Site Henderson, NV NVR 000 091 819

PREPARED FOR

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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 prepared 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.

Description of Services Provided:

This Hazardous Waste Management Plan (HWMP) has been prepared to address the proper management of solid wastes characterized as hazardous waste generated at the Nevada Environmental Response Trust facility at 510 S. Fourth Street, Henderson, Nevada. This plan addresses management of hazardous waste to comply with State of Nevada laws and regulations, which incorporate by reference many of the federal requirements under the Resource Conservation and Recovery Act (RCRA).



Kyle Hansen, CEM
Field Operations Manager/Geologist
Tetra Tech, Inc.

January 6, 2017

Date

PLAN REVISIONS

Tetra Tech, Inc., on behalf of the Nevada Environmental Response Trust (NERT), will review this plan periodically and amend as necessary, as follows:

The RCRA Contingency Plan (Section 2.0) will be revised whenever:

- Applicable regulations are revised
- The plan fails in an emergency
- The Site or work activities change in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or in a way that changes the response necessary in an emergency
- The list of emergency coordinators changes
- The list of emergency equipment changes

In addition, this Waste Management Plan will be updated if, in the future, NERT's generator status changes or waste characteristics change from those addressed in this plan.

ABBREVIATIONS AND ACRONYMS

| | |
|------|---|
| ANSI | American National Standards Institute |
| ASD | Accumulation start date |
| CAA | Container accumulation area |
| CFR | Code of Federal Regulations |
| DOT | U.S. Department of Transportation |
| EC | Emergency Coordinator |
| EPA | U.S. Environmental Protection Agency |
| ETI | Envirogen Technologies Incorporated |
| FOL | Field Operation Leader |
| HWMP | Hazardous Waste Management Plan |
| LQG | Large quantity generator |
| NAC | Nevada Administrative Code |
| NDEP | Nevada Division of Environmental Protection |
| NERT | Nevada Environmental Response and Trust |
| RCRA | Resource Conservation and Recovery Act |
| RQ | Reportable quantity |
| SAA | Satellite accumulation area |
| SDS | Safety data sheets |
| SSO | Site Safety Officers |

1.0 INTRODUCTION AND PURPOSE

This Hazardous Waste Management Plan (HWMP) has been prepared to address the proper management of solid wastes characterized as hazardous waste generated by investigation and remediation activities at the NERT facility at 510 S. Fourth Street, Henderson, Nevada (herein after referred to as the “Site”). During activities planned as part of investigation and remediation activities, more than 1,000 kilograms (kg) of hazardous waste may be generated at the Site within a single month. As a result, NERT has registered the Site with the Nevada Division of Environmental Protection (NDEP) as a Nevada large quantity generator (LQG). The NDEP has assigned EPA ID Number NVR 000 091 819 to the Site.

This plan addresses management of hazardous waste, universal waste, and used oil to comply with State of Nevada laws and regulations for LQGs, which incorporate by reference federal requirements under the Resource Conservation and Recovery Act (RCRA), with additions related to container labeling, documentation of weekly inspections, and submission of manifests back to the state.

The entirety of the Site is owned by NERT. A portion of the property owned by NERT is leased to Tronox LLC (Tronox), which uses it for ongoing chemical manufacturing operations (referred to herein as the “Tronox Leasehold”). While most, if not all, of the hazardous waste generated within the footprint of the NERT property will be generated at the Tronox Leasehold, Tronox is itself a large quantity generator (LQG) of hazardous waste. Tronox maintains its own hazardous waste identification number and plan for managing hazardous waste generated as a result of its own operations. As a result, the Tronox Leasehold is not considered part of the Site. This HWMP does not apply in any way to Tronox’s operations and applies solely to the investigation and remediation activities being performed at the Site by Tetra Tech, on behalf of NERT. All hazardous waste generated from such investigation and remediation activities will be manifested to a disposal facility using the NERT’s hazardous waste identification number for the Site.

Any and all solid wastes generated as a result of investigation and remediation activities at the Site and determined to be hazardous waste will be managed in accordance with this HWMP. Waste determination procedures and findings are discussed in more detail in Section 5.0.

This plan incorporates the following plans required of LQGs:

- RCRA Contingency Plan (Section 2.0), as required by *Nevada Administrative Code (NAC) 444.8632*, incorporating Title 40 *Code of Federal Regulations (40 CFR) 262.34(a)(4)* and 265 Subpart D by reference;
- Hazardous Waste Training Plan, including job descriptions (Section 3.0), as required by NAC 444.8632, incorporating 40 CFR 262.34(a)(4) and 265.16 by reference; and
- Waste Minimization Plan (Section 4.0), as required by NAC 444.8632, incorporating 40 CFR 262.27 by reference.

This document also addresses waste characterization (Section 5.0), waste management (Section 6.0), waste documentation and transportation (Section 7.0), and recordkeeping (Section 8.0).

2.0 RCRA CONTINGENCY PLAN

This RCRA contingency plan contains the elements required by NAC 444.8632, 40 CFR 262.34(a)(4), and 40 CFR Part 265 Subpart D, to allow Site personnel to effectively handle and report emergencies that could affect hazardous waste at the Site.

Copies of this RCRA contingency plan, including all revisions to this plan, will be or have been:

- Maintained at the Site; and
- Submitted to the St. Rose Dominican Hospital, City of Henderson Police Department, City of Henderson Fire Department, City of Henderson Office of Emergency Management, Las Vegas Metropolitan Police Department, and Clark County Fire Department.

Copies of letters submitting the plan and acknowledgements from the response agencies are included as Appendix A.

Tetra Tech, on behalf of NERT, will review and immediately amend this contingency plan, if necessary, whenever:

- Applicable regulations are revised;
- The plan fails in an emergency;
- The Site changes (in its design, construction, operation, maintenance, or other circumstances) in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or in a way that changes the response necessary in an emergency;
- The list of emergency coordinators (ECs) changes; or
- The list of emergency equipment changes.

2.1 EMERGENCY COORDINATORS

The EC will be on the premises or on-call to coordinate all emergency response measures. In the event that the primary EC is not available to respond to an emergency in a short period of time, the primary EC will designate authority to the designated alternate EC. Both the EC and the designated alternate EC are thoroughly familiar with all aspects of the Site's contingency plan, all operations and activities at the Site, the location and characteristics of waste handled, the location of all records at the Site, and the Site layout, and have the authority to commit the resources needed to carry out this plan.

The primary and alternate ECs will be familiar with:

- All aspects of this RCRA contingency plan;
- Operations and activities at the Site;
- Location and hazardous properties of the wastes handled at the Site;
- Location of hazardous waste records;
- Layout of the Site;
- Agreements made with state or local authorities; and
- Outside emergency response contractors who can assist in the event of an emergency.

Tetra Tech, on behalf of NERT, will train employees in proper waste handling and emergency procedures relevant to their job responsibilities (Section 3.0).

ECs at the NERT Site are:

PRIMARY EC

Steve Clough
Trust Environmental Contact
Office: (702) 960-4309
Home/Cell: (702) 686-9611
Home Address: 825 Plockton Ave.
Henderson, Nevada 89012

ALTERNATE EC

Kyle Hansen
Trust Environmental Contact
Office: (702) 966-8340
Home/Cell: (801) 949-6663
Home Address: 1700 Estrella Street
Las Vegas, Nevada 89117

2.2 OUTSIDE EMERGENCY RESPONDER ARRANGEMENTS

This section refers to arrangements with response agencies, including their contact information and resources. Section 2.3, which follows, describes agency or contractor responses to fires and explosions, medical emergencies, and spills. This contingency plan has been submitted to St. Rose Dominican Hospital, City of Henderson Police Department, City of Henderson Fire Department, and City of Henderson Office of Emergency Management, Las Vegas Metropolitan Police Department, and Clark County Fire Department.

Procedures for Site personnel are contained in the remaining sections of this contingency plan. Table 1 provides a list of emergency contacts and their associated telephone numbers. This table is posted where it is readily available to Site personnel (for example, job site trailer, field office, or other central and visible location) and in the less-than-90-day container accumulation area (CAA). A copy of the emergency contact list and routes to the nearest hospital and clinic will be kept in all Site vehicles.

2.2.1 Fires and Explosions

Different response procedures are in place depending upon if the incident occurs on the Tronox Leasehold portion of the Site or on other portions of the Site. In the event that a fire or explosion occurs off of the Tronox Leasehold, 9-1-1 will be notified first. If an incident occurs on the Tronox Leasehold, Tronox security will be notified first, who will then call 9-1-1. The Emergency Coordinator, as designated in this plan will be notified as soon as possible of any fire or explosion.

In the event of fire or explosion, it is anticipated that the Fire Department will function as the lead agency until the emergency situation is resolved. The Henderson Fire Department consists of nine stations and has been divided into two battalions, with approximately 60 personnel per shift. The City of Henderson Fire Department has the ability to respond to emergencies with two Truck Companies. Daily staffing of the Engine Companies consists of one Captain, one Engineer, one Firefighter and one Firefighter/Paramedic. The Technical Rescue Team on each shift provides expertise on swift water, confined space, high angle, trench rescues, vehicle and heavy machinery extrication.

A HazMat Team formed by City of Henderson Fire Department in 2014 provides response, detection and decontamination capabilities for incidents involving hazardous materials. If hazardous waste is involved in the fire or explosion situation, the fire department shall be notified of the hazards presented by the waste. However, this team is not a primary response contractor for non-emergencies.

Table 1 Emergency Contacts

| Agency | Telephone |
|--|---|
| EMERGENCY (Police, Fire, and Ambulance) | 9-1-1 |
| Tronox Security/EMT (Emergency) | (702) 651-2200 via cell |
| St. Rose Dominican Hospital, Henderson, NV | (702) 564-2622 |
| Poison Control Center | (800) 222-1222 |
| City of Henderson Police Department (Non-emergency) | (702) 267-5000 |
| Las Vegas Metropolitan Police Department (Non-emergency) | (702) 828-3111 or 311 |
| Fire Departments (Non-emergency) | Henderson: (702) 267-2222 Clark County: (702) 455-7311 |
| Public Utility Clearance – Nevada One Call | 8-1-1 usanorth811.org |
| Henderson Public Utilities (emergency numbers) | Call 9-1-1 first NV Energy Electric – (702) 402-2900 Natural Gas – (877) 860-6020 Water – (702) 267-5900 |
| Site Contacts | |
| Steve Clough (Emergency Coordinator) | Office: (702) 960-4309 Home/Cell: (702) 686-9611 |
| Kyle Hansen (Alternate Emergency Coordinator) | Office: (702) 966-8340 Home/Cell: (801) 949-6663 |
| Andrew Steinberg (NERT Coordinator) | (312) 498-2800 |
| Tronox Contact – John Holstrom (Non-emergency) Alternates: Shift Supervisor (plant permits/assistance) Gilbert Buco, Project Engineering | (702) 465-6703 (702) 592-3759 (702) 651-2353 |
| Contractors | |
| Envirogen Technologies Inc. (ETI) Wendy Prescott | Cell: (702) 371-9307 |
| Spill Notification | |
| NDEP 24-hour Spill Hotline | (888) 331-6337 |
| National Response Center (oil/chemical spills) | (800) 424-8802 |

2.2.2 Spill Response and Clean Up

Should there be a spill or release of hazardous waste, the EC will be notified and evaluate whether the Site's trained personnel can safely and effectively clean up the spill. Based on the nature of the currently generated waste (for example, contaminated demolition and closure debris), NERT anticipates that any release will be addressed by Site personnel. In addition to Tetra Tech contractors active at the Site, NERT has a master service agreement in place with Tetra Tech that would allow mobilization of emergency responders to address larger spills. Based on the volume of material released, NERT also will notify state and federal spill response hotlines, as necessary. The NERT Coordinator will be notified as soon as possible of any reportable quantity release.

2.2.3 Ambulance Services

The City of Henderson provides complete emergency medical services (EMS), from first response to hospital transport. The City of Henderson Fire Department currently has seven transport-capable Paramedic Rescue units servicing the city 24 hours a day, each staffed with Firefighter/Paramedics. Nine Fire Engines, two Truck Companies, and one Heavy Rescue are equipped and staffed to provide first-response services from nine fire stations throughout the city. Each of the nine fire stations has an engine company staffed with Firefighter/Paramedics who provide advanced life support first response. The Truck Companies are also staffed with Firefighter/Paramedics and the Heavy Rescue is staffed with EMT-trained personnel. All emergency response units are equipped with defibrillators. All front-line Paramedic Rescue units are equipped with 12-lead EKG monitors.

2.2.4 Tronox Response Team

In the event of an emergency on the Tronox Leasehold portion of the Site, Tronox security will be notified first, who will then call 9-1-1. Tronox security may also be notified for support during emergencies on the Site proper. In addition, the evacuation alarm (Section 2.7) is administered by Tronox security.

2.3 GENERAL EMERGENCY PROCEDURES

This section describes the general procedures for responding to an emergency and the follow-up procedures after an emergency. These procedures will apply to all emergencies, but additional actions specific to spills, fires, and explosions are included in Sections 2.4 through 2.6. Evacuation procedures are in Section 2.7.

If an emergency cannot be handled using resources available at the Site, personnel will evacuate to a safe place of refuge and the appropriate emergency response agencies will be notified. It has been determined that the majority of potential emergency situations would be better supported by outside emergency responders. These agencies are located within a reasonable distance from the area of Site operations, which ensures adequate emergency response time.

In the event that Site personnel cannot control the incident through offensive and defensive measures, the EC will enact the following emergency notification procedures to secure additional assistance:

- If evacuated to a location on the Tronox Leasehold portion of the property, contact Tronox security first, who will then call 9-1-1.
- Otherwise, call 9-1-1 or other emergency contacts (Table 1) to report the emergency and provide the following information:
 - Location of emergency
 - Type of emergency
 - Number of injured personnel

- Brief description of what occurred.
- Stay on the phone and follow the instructions given by the operator. The operator will then notify and dispatch the proper emergency response agencies.

When there is an imminent or actual emergency situation, the EC will immediately:

- Notify personnel of the nature of the emergency and initiate evacuation, as necessary, using cellular telephones; and
- Notify appropriate state or local agencies with designated response roles, if their help is needed.

When there is an emergency, the EC will immediately identify the character, exact source, amount, and areal extent of any released materials, if any.

Concurrently, the EC will assess possible hazards to human health and the environment (considering direct, indirect, immediate, and long-term effects) that may result from the emergency.

If the EC determines that the emergency could threaten human health or the environment, the EC will report the findings to the necessary agencies (Table 1) as follows:

- If the EC's assessment indicates that evacuation of local areas (for example, neighboring businesses, etc.) may be advisable, the EC will immediately notify appropriate local authorities. The EC will be available to help appropriate officials decide whether local areas should be evacuated; and
- The EC will immediately notify the NDEP (using their 24-hour toll free number: 888-331-6337) and the National Response Center (using their 24-hour toll free number: 800-424-8802).

The EC's assessment report will include:

- Name and telephone number of reporter;
- Name and address of the Site;
- Time and type of incident (for example, release, fire);
- Name and quantity of material(s) involved, to the extent known;
- The extent of injuries, if any; and
- The possible hazards to human health or the environment outside the Site.

2.3.1 Actions During the Emergency

During an emergency, the EC will take all reasonable measures necessary to prevent the emergency from causing a release of other hazardous waste or hazardous chemicals (if any) at the Site. If the Site stops operations in response to the emergency, the EC will monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate. The EC will also stop processes and operations, collect and contain released waste, and remove or isolate containers.

In the event of an emergency alarm at the Site, as indicated by a notification using cellular telephones or the activation of the Tronox alarm (Section 2.7), the primary response action is for personnel to safely halt operations and move to the designated evacuation area at the direction of the EC (location should be upwind and not involved in the emergency) and to remain there until the all-clear signal is given by the EC or outside agency emergency responder personnel (for example, the fire department).

When the alarm sounds, all motor vehicle movement in the affected area will cease and vehicles on roads will clear the right-of-way in and around the affected area and remain parked until emergency vehicles

have passed or the EC has directed them to move. The EC will direct personnel to stay clear of the affected areas of the Site and if required, direct other Site personnel (outside the affected area) to the evacuation area.

The EC will provide insipient emergency prevention activities such as:

- Initial (for example, non-structural) fire-fighting support (using fire extinguishers) and prevention
- Initial spill control and containment measures that can be performed by qualified personnel with appropriate training (for example, the ECs)
- Evacuation of personnel from emergency situations and notification of Site and emergency personnel if emergency occurs
- Initial medical support (or direction to qualified first aid/CPR qualified persons at the Site) for injury/illness requiring only first aid-level support

Any response beyond the above initial or incipient actions will be performed by outside responders (for example, fire department, ambulance services, or spill response contractor, as appropriate).

2.3.2 Actions Immediately After Emergency

Immediately after an emergency, the EC will provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the Site. At the present time, solid materials resulting from spill cleanup activities will be placed into the waste container from which the material was spilled, if the container is not damaged.

If the container is damaged, the cleanup materials will be put temporarily in container with a lid until a new container is brought to replace any damaged or leaking container. If any liquid waste is generated, the liquids will be placed into a DOT-approved container compatible with the type of waste, then sampled and analyzed to determine appropriate characterization and disposal requirements.

The EC will ensure that, in the affected area(s) of the Site:

- No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and
- Emergency equipment listed in the contingency plan (Table 2) is cleaned of adhering waste, re-stocked, and fit for its intended use before operations resume.

Table 2 Emergency Equipment

| Equipment | Capabilities | Location |
|---|---|--|
| Envirogen Technologies Incorporated (ETI) Laboratory | | |
| Spill kit | Spill response equipment includes: 5 lbs. granular sorbent material for acids, 5 lbs. granular sorbent materials for caustics, broom | <ul style="list-style-type: none"> Cupboard in laboratory |
| Fire extinguisher | Tri-class ABC extinguisher | <ul style="list-style-type: none"> Inside laboratory |
| Shower | Standard shower | <ul style="list-style-type: none"> In bathroom next to the laboratory |
| AP-5 Pond Area | | |
| Fire extinguishers | Tri-class (ABC) | <ul style="list-style-type: none"> Adjacent to the less-than-90-day CAA Adjacent to the decontamination area at west side of AP-5 Pond Project job trailer west of AP-5 Pond Each piece of heavy equipment Each company vehicle Next to each generator |
| Spill kits | Heavy-duty 45-gallon plastic container labeled "spill kit," containing a supply of granular sorbent material, sorbent pads, and sorbent booms | <ul style="list-style-type: none"> Adjacent to the less-than-90-day CAA Project job trailer west of AP-5 Pond |
| Dry cleanup equipment | Broom and shovel | <ul style="list-style-type: none"> Project job trailer west of AP-5 Pond |
| First aid kits | Industrial kit with blood borne pathogen kit for first aid and CPR needs based on American National Standards Institute (ANSI) standards | <ul style="list-style-type: none"> Project job trailer west of AP-5 Pond Adjacent to the less-than-90-day CAA Adjacent to the decontamination area at west side of AP-5 Pond |
| Eye wash stations | 16-gallon capacity designed for a 15-minute flush | <ul style="list-style-type: none"> Adjacent to the less-than-90-day CAA Adjacent to the decontamination area at west side of AP-5 Pond Project job trailer west of AP-5 Pond |
| Eye wash bottles | Portable, 1-quart bottles | <ul style="list-style-type: none"> Adjacent to the less-than-90-day CAA Project job trailer west of AP-5 Pond |
| Decontamination equipment | Decontamination tubs, soapy water, clean water, scrub brushes, wipes, and fire hose | <ul style="list-style-type: none"> West side of AP-5 Pond |

Within 15 days after an incident, the EC will submit a written report on the incident to NDEP. The report will include:

- Name, address, telephone number, and EPA ID number of the Site;
- Date, time, and type of incident (for example, fire, explosion);
- Name and quantity of material(s) involved;
- The extent of injuries, if any;
- An assessment of actual or potential hazards to human health or the environment, where this is applicable;
- Estimated quantity and disposition of recovered material that resulted from the incident;
- Cause of incident; and
- Description of corrective action taken to prevent reoccurrence of the incident.

The contingency plan also will be reviewed and revised, as necessary, after any incident.

2.4 SPILL AND RELEASE PROCEDURES

Both hazardous waste (for example, contaminated concrete debris) and hazardous materials (for example, diesel fuel or asbestos-containing debris) may be spilled or released at the Site.

In the event of a spill:

- The observer of the spill will:
 - Notify the EC immediately and keep others out of the area.
 - Direct traffic away from the spill area.
 - If it can be safely stopped, the source of the release may be addressed (for example, closing a container).
 - If the situation has the potential to result in a fire, explosion, or exposure or if there is an uncontrolled release (an imminent or actual emergency situation), **call 9-1-1 or Tronox security (702-651-2200)**, depending on the location of the release (Section 2.3).
 - Proceed to a safe location.
- Upon notification, the EC will:
 - Evaluate the spill and sound the alarm if not already done.
 - Identify the character, exact source, amount, and areal extent of any released materials.
 - Observe personnel for any signs of overexposure.
 - If necessary, notify others in the area and proceed to move away from the area to an upwind evacuation area following the evacuation plan (Section 2.7).
 - If the situation has the potential to result in a fire, explosion, or exposure or if there is an uncontrolled release, **call 9-1-1 or Tronox security (702-651-2200)**, if a notification has not already been made.
- If the release can be addressed by the Site response team (EC and trained hazardous waste personnel) in a safe manner, with the available personal protective equipment and response equipment (Table 2), the services of the response contractor may not be required. Tetra Tech personnel will use the spill kit to contain/absorb and remove spilled materials.
- For larger spills or releases that cannot be addressed by the response personnel, the EC will:
 - Inform the Site Safety Officers (SSOs) of all consultants and contractors hired by NERT.

- Notify the appropriate local, state, and federal agencies, if necessary based on the volume of material released
- After the spill has been cleaned up, the EC will:
 - Sound the all-clear.
 - Direct waste disposal for any cleanup wastes.
 - Conduct required follow-up reporting and documentation.
 - Evaluate and implement corrective actions.
 - As necessary, revise the contingency plan.

Spills in excess of Reportable Quantities must be reported to NDEP.

The reportable quantity for hazardous waste is based on the Federal EPA guidelines established under Title III List of Lists (40 CFR 302). Reportable quantities for wastes that have been or are likely to be generated at the NERT Site include:

- Ignitable waste (D001): More than 100 pounds
- Reactive waste (D003): More than 100 pounds
- Characteristic chromium waste (D007): More than 10 pounds of waste.

The reportable quantity for petroleum products such as gasoline, diesel, and hydraulic fluid is 25 gallons or 3 cubic yards of contaminated material, or the presence on or in groundwater.

A spill of any quantity that affects a water way, or water of the State, must be reported, regardless of the quantity, according to NDEP spill reporting hotline guidance at http://ndep.nv.gov/bca/spil_rpt.htm.

Spills must be reported to the NDEP as soon as possible, but no later than the end of the first working day of the release.

2.5 FIRE PROCEDURES

Site personnel are responsible for fire protection in all of their work areas at all times during the duration of this field effort (24 hours per day/seven days per week). Approved fire-fighting equipment and extinguishers in adequate quantities for their work activities must be provided. Fire extinguishers will be kept in close proximity to field activities and their location will be discussed during the daily tailgate safety meeting. **Note that a fire extinguisher cannot put out a perchlorate fire and evacuation will be mandatory for such an event.**

Fire extinguishers will be inspected annually by a contracted professional fire suppression equipment service company and inspected monthly by the EC or the EC's staff to ensure:

- Sufficient charge
- No physical damage
- Tamper indicators are in place
- Up-to-date inspection tag

In the event of a fire:

- The observer of the fire or explosion will:
 - Notify the EC immediately and keep others out of the area.
 - Direct traffic away from the incident.

- **Call 9-1-1 or Tronox security (702-651-2200)**, depending on the location of the release
- Proceed to a safe location.
- Upon notification, the EC will:
 - Evaluate the fire area and sound the alarm if not already done.
 - If necessary, notify others in the area and proceed to move away from the area to an upwind evacuation area following the evacuation plan (Section 2.7).
 - If a notification has not already been made, **call 9-1-1 or Tronox security (702-651-2200)**.
- If the fire can be addressed by the response team (EC and trained hazardous waste personnel) in a safe manner, with available personal protective equipment and response equipment (Table 2), subcontractor personnel will use the fire extinguishers.
 - A fire that cannot be readily extinguished with one 10-pound fire extinguisher will be considered major and may require evacuation of project and/or Site personnel to safe areas.
 - In no case will workers attempt to fight any fire that cannot be reasonably extinguished within 30 seconds to 1 minute.
 - Workers attempting to extinguish the fire will stand 10 feet away from the fire, aim the nozzle at the base of the fire, and sweep from side to side.
 - Other staff should remain far enough away from the spray to avoid being splashed with the extinguishing agent.
- For fires that cannot be extinguished by Site response personnel (an imminent or actual emergency situation), the EC will:
 - Initiate evacuation procedures (Section 2.7).
 - After calling 9-1-1, describe to the fire dispatcher:
 - Location of the fire, number of injured persons and nature of injuries, if known;
 - Substance(s), chemical(s), or materials involved in the fire;
 - Size of the fire and available fuel (estimate);
 - Extent of fire;
 - Rate that the fire is expanding (estimate);
 - Time the fire started; and
 - Any other pertinent information (for example, are there injuries).
 - Assist firefighters and/or police by notifying them of the location of any flammable or explosive material stored on the premises.
- For all fires, the EC will:
 - Inform NERT subcontractor SSOs.
 - Notify the appropriate local, state, and federal agencies, if necessary based on the volume of material released
- After the fire has been extinguished, the EC will:
 - Sound the all-clear, as allowed by fire or police personnel.
 - Direct waste disposal for any cleanup wastes
 - Conduct required follow-up reporting and documentation.
 - Evaluate and implement corrective actions.
 - As necessary, revise the contingency plan.

2.6 EXPLOSION PROCEDURES

Because of the nature of the materials being manufactured at the Tronox lease property and the materials contaminating soil and construction and demolition debris, explosion is a risk at the Site.

An explosion is considered an imminent or actual emergency situation (Section 2.3). In the event of an explosion, **personnel will immediately initiate evacuation procedures** (Section 2.7). From a safe location, personnel will **call 9-1-1 or Tronox security (702-651-2200), and notify the EC immediately.**

In the event of an explosion:

- Upon notification, the EC will:
 - Sound the alarm if not already done.
 - Initiate evacuation procedures (Section 2.7).
 - If a notification has not already been made, **call 9-1-1 or Tronox security (702-651-2200).**
 - Describe to the fire dispatcher or Tronox security:
 - Location of the explosion, number of injured persons and nature of injuries, if known;
 - Substance(s), chemical(s), or materials involved in the explosion;
 - If a fire results, the size of the fire and available fuel (estimate);
 - Extent of fire;
 - Rate that the fire is expanding (estimate);
 - Time the fire started and the time the fire was extinguished; and
 - Any other pertinent information (for example, are there injuries or damage to structures, equipment, or waste containers from the explosion).
 - Assist firefighters and/or police by notifying them of the location of any flammable or explosive material stored on the premises.
 - Inform the Tetra Tech SSO, a Tetra Tech office, and a Site representative immediately.
 - Notify the Trust and appropriate local, state, and federal agencies, if necessary based on the volume of material released.
- After the fire or police personnel have cleared the scene, the EC will:
 - Sound the all-clear, as allowed by fire or police personnel.
 - Direct waste disposal for any cleanup wastes.
 - Conduct required follow-up reporting and documentation.
 - Evaluate and implement corrective actions.
 - As necessary, revise the contingency plan.

2.7 SITE EVACUATION PLAN

An evacuation will be initiated when recommended hazard controls are insufficient to protect the health, safety or welfare of workers. Specific examples of conditions that may initiate an evacuation include, but are not limited to the following: severe weather conditions; fire or explosion; monitoring instrumentation readings which indicate levels of contamination are greater than instituted action levels; Tronox Site emergency alarm; and evidence of personnel overexposure to potential contaminants.

An evacuation will be triggered by any of the following methods, alone or in combination:

- A verbal announcement to all surrounding personnel (“Begin evacuation!”).
- An announcement using cellular telephones to begin evacuation procedures (“Begin evacuation!”).
- The sounding of the Tronox alarm (Figure 1).
- The sounding of an air horn, following the same pattern as the Tronox alarm.

Figure 1 Tronox Alarm System

| | |
|-------------------|--|
| Test 1-1 | ** * * * * Test and all clear (may be sounded at any time) |
| Stage 1 3-3 | *** ** * * * * ALERT! Locate a Tronox employee with a radio for information. No evacuation at this time. |
| Stage 2 Rapid | ***** Conduct emergency shutdown of anything that could produce a spark or flame and evacuate to in-plant meeting points. |
| Stage 3 Steady | _____ Do not delay. Evacuate to out-of-plant meeting points per instructions or wind direction |

In the event of an emergency requiring evacuation, personnel will immediately stop activities and report to the designated place of refuge unless doing so would pose additional risks. When evacuation to the place of refuge is not possible, personnel will proceed to a designated alternate location and remain until further notification from their Field Operation Leader (FOL), the SSO, or the EC.

Evacuation procedures will be discussed during the daily tailgate safety meeting prior to the initiation of project tasks. Evacuation routes will be determined on a daily basis, based on prevailing winds for that day, and discussed during the daily health-and-safety (H&S) tailgate meeting that begins each day’s work. Evacuation routes from the Site and places of refuge are dependent upon the location at which work is being performed and the circumstances under which an evacuation is required. Additionally, meteorological conditions (that is, wind speed and direction) may dictate evacuation routes. Evacuation should always take place in an upwind direction from the incident. Windsocks are located at several locations at the Site. An additional windsock shall be placed near the work area for quick identification of wind direction.

During an evacuation, personnel will remain at the refuge location until directed otherwise by the Tetra Tech FOL or the Incident Commander of the Emergency Response Team. When possible, the place of refuge will also serve as the telephone communications point for that area. The FOL, SSO, or EC will perform a head count at this location to account for and confirm the location of Site personnel. Emergency response personnel will be immediately notified of any unaccounted personnel. The SSO will document the names of personnel at the Site (on a daily basis) in the Health and Safety Logbook or the daily tailgate safety meeting form. This information will be utilized to perform the head count in the event of an emergency.

During an evacuation, decontamination procedures will be performed only if doing so does not further jeopardize the welfare of Site workers. However, it is unlikely that an evacuation would occur which would require workers to evacuate the Site without first performing decontamination procedures.

The NERT Coordinator shall be contacted immediately in the event of a fatal or serious injury, an unpermitted environmental release, or any environmental, health or safety incident that is likely to generate significant publicity or an adverse situation for the Trust.

3.0 HAZARDOUS WASTE TRAINING

NAC 444.8632 and 40 CFR 262.34(a)(4) and 265.16 require that personnel involved in managing hazardous waste, preparing hazardous waste for transportation to the disposal facility, and implementing the RCRA Contingency Plan receive initial and annual training to perform their hazardous waste duties.

NERT understands that the owner or operator of a facility with hazardous waste operations must provide a program of classroom instruction and/or on-the-job training for Site personnel, which will be provided by Tetra Tech. This plan establishes how Site personnel will be instructed to safely perform their duties associated with hazardous waste management, and in a manner that ensures NERT's compliance with the hazardous waste regulations applicable to the positions in which personnel acting on behalf of NERT are employed, and the duties they are assigned.

For each position related to hazardous waste management tasks at the Site:

- Personnel will be named and have a written job title and job description.
- The training type and frequency of training will be documented.
- The Site will maintain training records until closure of the Site. Training records for former employees will be kept for at least 3 years from the date the employee last worked at the Site.

This hazardous waste training plan will be updated when personnel names, job titles, or functions and duties of assigned personnel change, or if regulations are updated.

3.1 TRAINING REQUIREMENTS

Training will familiarize hazardous waste personnel (Appendix B) with implementation of the RCRA contingency plan (Section 2.0), including Site-specific emergency equipment and systems, and emergency procedures such as: 1) communication and alarm systems; 2) responses to fires or explosions; and 3) shutdown of operations. This training will also include information about hazardous waste determination, management of hazardous waste onsite, weekly inspection procedures, and manifesting of waste. This training is required for all relevant personnel initially and then annually thereafter.

All project personnel must complete 40 hours of introductory hazardous waste operations (HAZWOPER) training prior to performing work at the Site. Project personnel who have had introductory training more than 12 months prior to work at the Site must have completed 8 hours of refresher training within the past 12 months before being cleared for work at the Site. In addition, 8-hour supervisory training in accordance with 29 CFR 1910.120(e)(4) will be required for subcontractor supervisory personnel. Additionally, all personnel with 40 hours of initial HAZWOPER training are also required to have a minimum of 3 days of field experience under the direct supervision of an experienced supervisor. Table 3 summarizes training frequencies.

Table 3 Training Frequency

| Training | Hazardous Waste Team | All Other Site Supervisors | All Other Site Personnel |
|--|----------------------|----------------------------|--------------------------|
| Hazardous Waste Management | Annual | n/a | n/a |
| Hazardous Waste Operations (HAZWOPER) 40-Hour Initial Training | One-time | One-time | One-time |
| HAZWOPER 8-hour Refresher | Annual | Annual | Annual |
| HAZWOPER 8-hour Supervisor | Annual | Annual | n/a |
| Basic First Aid | Biennial | Biennial | Biennial |
| Cardiopulmonary Resuscitation (CPR) | Biennial | Biennial | Biennial |
| Tronox Site Training | Semiannual | Semiannual | Semiannual |
| Perchlorate Hazard Communication | One-time | One-time | One-time |

3.2 JOB DESCRIPTION

Following is the job description for members of the hazardous waste management team. All members of the team, which includes the EC and alternate ECs, will receive the same hazardous waste training. Personnel holding these positions are identified by name in Appendix B.

3.2.1 Duties and Responsibilities

Members of the hazardous waste management team have the responsibility for implementation of this HWMP, including the contingency plan and this training plan. Additional duties include:

- Reviewing and signing waste profiles, manifests, and land disposal restrictions forms;
- Tracking manifests returned from the designated disposal facility and preparing exception reports, as needed;
- Maintaining all records required for LQGs;
- Ensuring that waste is being managed correctly at the Site;
- Ensuring that waste accumulation areas are inspected thoroughly weekly and that any deficiencies are addressed in a timely fashion;
- Verifying proper containers and packaging requirements for hazardous waste;
- Marking and labeling of the hazardous waste containers while at the Site; and
- Maintaining the waste tracking log sheet and coordinating disposal of the containers with waste transportation and disposal vendors.

3.2.2 Training Requirements

The following material will be included in both initial and refresher training. Initial training will be within 6 months of employment, and workers will be under the direct supervision of a trained employee until initial training is conducted. Refresher training will be conducted annually.

Training is designed to meet the federal and state requirements for hazardous waste and is designed for Site personnel who are responsible for ensuring compliance with state and federal hazardous waste regulations. Upon completion, personnel will know how to properly identify, store, ship, and dispose of hazardous waste.

An outline of a typical RCRA training course is included as Appendix C. Hazardous waste management topics include:

- Regulatory structure, key terms, and definitions
- Waste identification: what is a hazardous waste and what is excluded from the definition of solid waste or of hazardous waste
- How to properly accumulate and manage hazardous waste
- Preparing the U.S. EPA Hazardous Waste Manifest
- Hazardous waste recordkeeping, reporting, and the training standard
- General packaging and labeling requirements

3.3 DOCUMENTATION

NERT and its subcontractors will ensure that all personnel included in this hazardous waste training plan document their training. An example of the training log is included as Appendix D. Documentation of HAZWOPER training and refreshers is maintained as part of the Site's H&S program.

4.0 WASTE MINIMIZATION

RCRA sets national policy that emphasizes the importance of reducing or preventing the generation of hazardous waste. It also contains provisions to promote implementation of waste minimization programs at hazardous waste management facilities. Under those provisions, hazardous waste generators must certify that they have a waste minimization program in place to reduce the volume or quantity and toxicity of their waste to the degree they determine to be economically practicable.

Because of the nature of waste generation at the Site, generation of hazardous waste will be for a finite period during investigation and remediation activities at the Site. Given the nature of the hazardous waste that is expected to be generated, health and safety requirements suggest that hazardous wastes be handled as little as possible and that hazardous wastes be removed from the Site as quickly as possible.

However, to minimize the volume or toxicity of waste generated at this Site, the following is being implemented:

- NERT and its subcontractors have a training program in place to familiarize personnel with proper waste management and has designated several individuals as Site points of contact to assist other Site personnel in the proper management of waste, should it be generated.
- Wastes that are recyclable (such as scrap metal) will be recycled rather than disposed, to minimize regulatory burden and the quantity of regulated hazardous waste generated.
- Small spills that occur will be promptly cleaned up and contained so as not to spread contaminants to other areas or other materials.
- Contaminated material (if generated) will not be placed with clean material.

5.0 WASTE CHARACTERIZATION

To properly manage waste at the Site and to ensure proper transport and disposal, all solid waste must be characterized to determine if it is hazardous waste.

Waste characterization will be based on one or a combination of the following criteria:

- Laboratory analysis of a representative sample of the waste for those contaminants reasonably expected to be present; and
- Generator knowledge about the process or waste (for example, SDSs).

Each hazardous waste must be characterized to identify applicable treatment standards and underlying hazardous constituents per 40 CFR Parts 261 and 262.

Before demolition of a building at the Site, waste characterization sampling will be conducted to classify waste materials. The following types of debris are anticipated to be generated by building demolition activities:

- Steel debris from the demolition of tanks
- Processed concrete debris
- Cut-up steel debris
- Materials removed from the trench drains
- Demolished piping along with the contents of that piping
- Material contained in electrolytic cells
- Materials used to construct electrolytic cells.
- Surface and subsurface soil.
- Sump, purge, and decontamination water.

The hazardous waste streams that may be generated during the AP-5 Pond equipment removal and pond transfer activities are:

- Used disposable personal protective equipment.
- Porous material that cannot be 100 percent visually inspected to verify/certify that no perchlorate residue is present.

Appendix E describes the waste streams generated at the Site to date, including the generating process, an estimate of the volume generated, and the waste characterization method to be used for each.

Additional sampling and analysis may be performed in the future (frequency to be determined) to ascertain whether the waste continues to be regulated under NDEP and federal regulations. Future sampling and analysis will be of representative samples of the waste generated.

6.0 WASTE MANAGEMENT AT THE SITE

When hazardous waste is generated at the Site, it will be managed properly in accordance with all applicable Nevada hazardous waste regulatory requirements and in consideration of the environmental and safety hazards the waste presents. Included in management are the requirements for specific marking and labeling of containers, container selection and use, storage and accumulation requirements, routine inspections, and recordkeeping. Hazardous waste generated at the Site is managed only in containers. Some hazardous C&D waste may be placed directly into truck trailers as it is removed from demolition areas, without being managed in a less-than-90-day container accumulation area (CAA).

6.1 GENERATOR WASTE TRACKING LOG

NERT will maintain an updated waste tracking log. A blank Waste Tracking Log is included as Appendix F. The log, at a minimum, will document the following:

- Container Identification Number
- Accumulation Start Date (ASD) for waste in each new container (date the waste is first placed into the roll off or container)
- Date by which waste must be shipped to the disposal facility (less than 90 days from ASD)
- Manifest number
- Manifest date (date the waste is picked up)
- Final copy of manifest received date
- Final weight of waste per manifest (weight determined at treatment/disposal facility).

6.2 GENERATOR IDENTIFICATION NUMBER

NDEP has assigned EPA ID Number NVR 000 091 819 to the Site.

6.3 HAZARDOUS WASTE CONTAINER SELECTION AND USE

The container selection and management requirements for hazardous waste are summarized below.

Containers will be selected based on condition and classification. They will be:

- Inspected prior to use to ensure they are in good condition (inspect upon receipt). Containers that are not in good condition (leaky, rusted, severely dented, or lids or bungs damaged) will not be used.
- Evaluated prior to use to determine if the container is compatible with the waste (for example, are the containers acceptable for concrete debris, Class 9 hazardous waste solids, and “sift proof”). Incompatible containers or containers delivered which contain other wastes will not be used.
- DOT approved (for example, United Nations [UN] specified roll-off boxes).
- No unwashed container will be accepted for use.

While at the Site, containers will be managed to meet all LQG requirements. They will be:

- Closed at all times, except when waste is being added or removed. Waste containers holding solids will have snug-fitting lids or tarps.
- Opened, handled, or stored in a manner that does not cause the container to rupture or leak, or the content to be released to the environment.
- Positioned so that labels and markings are clearly visible.
- Stored so that the container can be inspected from all sides (for example, 30 inches from the building).
- Marked with an ASD when the first waste is put in the container.
- Labeled with the words “Hazardous Waste” and relevant waste codes (Appendix E).
- If ignitable or reactive, managed more than 50 feet from the property boundary.

6.4 LESS-THAN-90-DAY CAA

Because the quantities of hazardous waste will exceed 55 gallons, less-than-90-day CAAs will be set up that conform to the hazardous waste requirements summarized below.

- The waste must be placed in approved containers (except bulk concrete waste which will be directly loaded into trucks that immediately leave the Site).
- Each CAA must be inspected not less than once per calendar week while in use to ensure containers are in good condition. A weekly hazardous waste accumulation area inspection log is included as Appendix G to this plan. Copies of these inspections and corrective action for deficiencies found during inspections will be maintained in the hazardous waste file records at the main office.
- A procedure is in place to document and ensure that wastes remain in CAAs for less than 90 days. A hazardous waste tracking log is included as Appendix F. All containers will also be marked with an ASD.
- Each CAA will only be used for storage of hazardous or other regulated waste (for example, universal waste or used oil) and not for storing non-hazardous waste materials, chemicals, or equipment. Good housekeeping practices must be followed.
- A copy of the emergency spill response procedures will be posted at each CAA and appropriate spill response material will be located in an immediately accessible location (Section 2.0).
- A two-way communication or cellular telephone will be available to the operator when working in a CAA for emergency communication purposes. Any staff involved in management of hazardous waste must carry a cellular phone at all times.

6.5 SATELLITE ACCUMULATION AREA (SAA)

In areas where small amounts of hazardous waste are being regularly generated, waste may be managed in SAA containers. Waste must be under the control of the generator and at the point of generation. The amount of hazardous waste in the SAA must not exceed 55 gallons.

When quantities exceed 55 gallons, the container must be moved to a less-than-90-day CAA. The CAA will be chosen based on proximity, available space, and the potential presence of incompatible waste. When it arrives at a CAA, the container from the SAA must be marked with the ASD (the day the container is moved to the CAA). The 90-day accumulation clock begins with the ASD.

The SAA must conform to the hazardous waste requirements summarized below.

- Closed at all times, except when waste is being added or removed. Waste containers holding solids will have snug-fitting lids or tarps.
- Opened, handled, or stored in a manner that does not cause the container to rupture or leak, or the content to be released to the environment.
- Positioned so that labels and markings are clearly visible.
- Stored so that the container can be inspected from all sides (for example, 30 inches from the building).
- Labeled with the words “Hazardous Waste” and relevant waste codes (Appendix E).
- If ignitable or reactive, managed more than 50 feet from the property boundary.

6.6 UNIVERSAL WASTE MANAGEMENT REQUIREMENTS

Universal wastes include used fluorescent or high-intensity (HID) lamps, used mercury-containing devices (for example, switches), and used lead-acid or nickel-cadmium batteries. Universal waste must be sent for recycling within 1 year of the ASD.

Containers holding universal waste will be:

- Closed at all times, except when waste is being added or removed. For containers without lids (for example, lamp ship-back boxes), “closed” consists of taped or Velcro closure.
- Opened, handled, or stored in a manner that does not cause the container to rupture or leak, or the content to be released to the environment.
- Positioned so that labels and markings are clearly visible.
- Stored so that the container can be inspected from all sides (e.g., 30 inches from the building).
- Marked with an ASD when the item is put in the container.
- Labeled with the words “Used Lamps,” “Used Mercury-Containing Devices,” or “Used Batteries,” as appropriate.

If a lamp is broken, people should leave the room, and the room should be ventilated the room for 5-10 minutes by opening a window or door to the outdoor environment. Materials needed to clean up the broken lamp include stiff paper or cardboard; sticky tape; damp paper towels or disposable wet wipes (for hard surfaces); and a glass jar with a metal lid or a sealable plastic bag.

Vacuuuming is not recommended unless broken glass remains after all other cleanup steps have been taken, as it could spread mercury-containing powder or mercury vapor. Fragments should be scooped up using stiff paper or cardboard. Duct tape can be used to pick up any remaining small glass fragments and powder. All materials, including the broken lamp and the used tape should be put in a glass jar, plastic bag, or some other sealable container. The broken lamps should then be managed following the same procedures outlined above.

Lead acid batteries should be stored in containers so that terminals do not contact each other. The terminals should be covered with clear, non-conducting tape.

6.7 USED OIL MANAGEMENT REQUIREMENTS

Used oil may be generated during maintenance of vehicles, compressors, process pumps or hydraulic equipment. In order to be exempt from hazardous waste management requirements or other levels of regulatory scrutiny, it should be collected for recycling by a used oil transporter with an EPA ID number.

Alternatively, it may be transported to a recognized collection center (for example, an oil retailer or a community recycling center).

Containers holding used oil will be:

- Closed at all times, except when waste is being added or removed.
- Opened, handled, or stored in a manner that does not cause the container to rupture or leak, or the content to be released to the environment.
- In good condition (no dents or visible rust). Stored so that the container can be inspected from all sides (e.g., 30 inches from the building).
- Labeled with the words "Used Oil."

If used oil is spilled, it will be cleaned up immediately using oil absorbent material (Table 2). Used oily absorbent material will be containerized, and the container will be labeled "used oil absorbent." Used oily absorbent can be disposed of as nonhazardous refuse if the container does not hold any free liquids. If the container does hold free liquid, it should be sent for recycling as used oil.

7.0 WASTE SHIPMENTS

7.1 DISPOSAL FACILITY SELECTION

Disposal facilities selected for receiving hazardous waste will:

- Be in physical compliance with applicable state laws;
- Not be releasing any hazardous wastes, hazardous constituents, or hazardous substances;
- Meet minimum technology requirements;
- Have a corrective action program to address releases and environmentally significant releases at non-receiving units at the facility; and
- Demonstrate a properly designed system, and must presently operate (and historically have operated) in a manner that controls the types of materials accepted for disposal.

A list of hazardous waste disposal facilities approved by NERT is included as Appendix H.

7.2 HAZARDOUS WASTE DOCUMENTATION

A properly trained (Section 3.0) and designated Site representative will review and sign waste profile sheets, LDR forms, and manifests. A disposal facility-approved and generator-signed waste profile sheet (along with supporting waste characterization documentation such as sample results) will result in the disposal facility issuing a permit (authorization) for that waste to be shipped to the disposal facility. Every load of hazardous waste leaving the Site will also be accompanied by a properly filled out and signed manifest with an LDR form attached.

Waste documentation will include the following, as applicable:

- Waste profile sheets (forms supplied by disposal facility) with supporting waste information (such as laboratory analysis) attached.
- Manifests for hazardous waste shipments.
- LDR notification/certifications (forms supplied by disposal facility).
- A copy of the disposal facility issued permit or acceptance letter to accept wastes as profiled.
- Copies of the weekly inspection and waste tracking log.

7.3 TRANSPORTATION

All RCRA-regulated hazardous wastes are considered to be Department of Transportation (DOT) Hazardous Materials and must be shipped in accordance with applicable DOT requirements. Hazardous material transported on U.S. land, water, or air must be properly classified, described, packaged, marked, and labeled for shipment as required by applicable DOT regulations. A DOT-trained person will review 49 CFR 172.101 to verify the packaging, shipping description, marking, and labeling, and manifest prior to shipment.

7.4 REPORTABLE QUANTITY DETERMINATION

Hazardous waste is subject to federal and state spill or release reporting requirements according to the following:

The reportable quantity for hazardous waste is based on the Federal EPA guidelines established under Title III List of Lists (40 CFR 302). Reportable quantities (RQ) for wastes that have been generated at the NERT Site include:

- Ignitable waste (D001): More than 100 pounds
- Reactive waste (D003): More than 100 pounds
- Characteristic chromium waste (D007): More than 10 pounds of waste.

A spill of any quantity that affects a water way within the State of Nevada must be reported, regardless of the quantity. The RQ applies to each shipment of hazardous waste and must be included with the proper shipping description on the manifest.

7.5 PACKAGING

Once a hazardous waste is characterized, it will be packaged, labeled, marked and/or placarded, as necessary, and in accordance with applicable regulations.

7.6 UNIFORM HAZARDOUS WASTE MANIFEST

For each bulk container of hazardous waste, the container will be transported to the disposal facility containing the following information on the manifest (EPA Form 8700-22):

- Shipping Description (including technical or group names (49 CFR 172.101))
- Total Quantity: The total quantity of waste must appear either before or after the above information along with the unit of measure (e.g., P for pounds).
- Reportable Quantity: If a RQ of a hazardous material or substance applies, then an “RQ” must appear either before or after the shipping description.
- Other required information:
- EPA identification numbers for: 1) Generator; 2) Transporter(s); and 3) Disposal Facility.
- 24-hour emergency response telephone number supplied by the disposal facility. This number must be:
 - Monitored at all times the hazardous material is in transportation, including storage incidental to transportation;
 - Monitored by a person who is knowledgeable of the hazardous material being shipped and has comprehensive emergency response and incident mitigation information for that material, or has immediate access to a person who possesses such knowledge and information;
 - Listed conspicuously on the manifest (e.g., “Emergency Contact _____”).
- Signatures of generator (Shipper’s Certification) and first transporter signature.
- Disposal facility name and address.
- Profile number assigned by the disposal facility.

The facility’s copy of the signed manifest will be detached and retained at the facility after both the facility and first transporter have signed. The remaining copies of the manifest (including original front page) will be given to the transporter along with the LDR certification (first disposal only), and the disposal facility permit. One copy of the manifest returned from the disposal facility will be sent to NDEP.

7.7 PLACARDING

Most hazardous waste generated by the NERT Site will be contained in bulk rolloff containers. Because the waste containers will have 1,001 or more pounds of Class 9 hazardous waste inside, placards are required. Placards will be affixed on each side and each end (all four sides) of the vehicle.

NERT will confirm use of placards for hazardous waste transportation (49 CFR 172.506). Appropriate placards will be determined by DOT-trained personnel. For most wastes, placards will be supplied by the transporters in advance, based on the waste profile. The Site will have extra placards on-hand, in the event the transporter arrives without placards.

8.0 RECORDKEEPING AND REPORTING FOR HAZARDOUS WASTE GENERATORS

The following sections contain the recordkeeping and reporting requirements for hazardous waste generators.

8.1 MANIFESTS AND BILLS OF LADING

The Site will maintain all hazardous waste manifests for the duration of the project. After the completion of the project, manifests will be maintained for at least 3 years after the last shipment of hazardous waste. For individual shipments, the copy of the manifest offered by the transporter will be maintained at the Site until the counter-signed manifest is received from the designated facility. After the counter-signed manifest is received, all earlier copies of that manifest can be discarded. At minimum, hard copies of all manifests will be maintained at the NERT office trailer and electronic copies on the Tetra Tech computer network.

The Site will also maintain for any bills of lading for used oil or other regulated wastes (for example, polychlorinated biphenyl (PCB) wastes) and receipts for shipments of universal waste for the duration of the project.

8.2 EXCEPTION REPORTING

If the counter-signed manifest is not received from the designated facility within 35 days of the date the waste was collected by the transporter, the Site will document all attempts to locate the waste during this time, including efforts to contact the transporter and/or the owner or operator of the receiving facility. If the original manifest is not received by day 45, an exception report will be filed with NDEP. All calls or other efforts undertaken to locate shipments will be documented in a log and will be included along with the exception report and a copy of the manifest with a cover letter.

8.3 DISCREPANCY REPORTING

Discrepancies due to differences between the quantities (for example, a weight difference of > 10% or different number of containers) of hazardous waste designated on the manifest or shipping papers and the quantity of hazardous waste a facility actually receives will be rectified within 15 days after the disposal facility receives the waste.

8.4 BIENNIAL HAZARDOUS WASTE REPORTING

As a LQG of hazardous waste, the Site is required to complete and submit the Biennial Report to NDEP, documenting the volumes of hazardous waste generated during odd-numbered years. The forms will be submitted by March 1 of each odd-numbered year. Copies of all biennial reports will be maintained at the Site for the duration of the project. After the completion of the project, copies of Biennial Reports will be maintained for at least 3 years after the last shipment of hazardous waste.

8.5 TRAINING RECORDS

Hazardous waste training records on current personnel will be kept until closure of the Site. Training records on former employees will be kept for at least 3 years from the date the employee last worked at the Site. At minimum, hard copies of all training logs will be maintained at the NERT office trailer and electronic copies on the Tetra Tech computer network.

8.6 INSPECTION LOGS

Weekly inspection logs for less-than-90-day CAAs will be kept until closure of the Site. During the month, the working copy of each inspection log will be maintained at the CAA. At the conclusion of each month, the hard copy will be filed at the NERT office trailer. At minimum, hard copies of all inspection logs will be maintained at the NERT office trailer and electronic copies on the Tetra Tech computer network.

8.7 RECORDKEEPING

Hard copies or electronic copies available to personnel onsite will be maintained as outlined below. The following hazardous waste records will be retained by the Site:

- Hazardous waste Biennial Reports
- RCRA Site Identification form
- Waste characterization records (e.g., profiles, analytical documentation, generator knowledge)
- Hazardous waste manifests
- Spill reports
- Training records on emergency preparedness
- Weekly inspection logs for hazardous waste accumulation areas
- Waste tracking logs
- Exception reports
- Site inspection reports, logs, and schedule
- Written contingency plan (Section 2.0 of this HWMP).

Appendix A

Emergency Response Coordination

Letters

OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE

Le Petomane XXVII, Inc., Not Individually, But Solely as the Nevada Environmental Response Trust Trustee

35 East Wacker Drive - Suite 1550

Chicago, Illinois 60601

Tel: (312)498-2800

January 6, 2017

City of Henderson Office of Emergency Management and Fire Department
Henderson City Hall
P.O. Box 95050
Henderson, NV 89009

Subject: RCRA Contingency Plan Update
Nevada Environmental Response Trust (NERT) Site
510 S. Fourth Street
Henderson, Nevada

Dear Sir or Madam:

As part of our requirements as a large quantity generator of hazardous waste, your organization received a copy of a hazardous waste Contingency Plan for the above referenced Site on June 1, 2016, to support emergency services for the Site, should the need arise. This letter provides an updated description of operations associated with generation of hazardous waste and a list of the emergency response equipment available for those operations. No other changes were made to the contingency plan. The Nevada Environmental Response Trust (NERT or Trust) intends to continue conducting operations in a safe and environmentally compliant manner and hopes that your services will never be required for our Site. However, in the event of an emergency, you may be called upon to respond.

The process that previously generated hazardous waste at the site (demolition of a building where materials were contaminated with chromium and perchlorate) has concluded. All waste associated with that process was shipped off site in accordance with applicable regulations. Current operations generating hazardous waste consist only of waste residue from paint and lubricant aerosol cans, which are properly containerized, and certain perchlorate-contaminated abandoned equipment removed from the AP-5 Pond area to prepare the AP-5 Pond for closure. The waste is properly containerized and managed in a less-than-90-day container accumulation area and will be shipped off site for disposal. The location of this area, an updated list of emergency response equipment, and where emergency response equipment is located are shown in the enclosures to this letter.

Please contact me at (702) 960-4309 if I can provide additional information or a tour of our operations.

Sincerely,

Office of the Nevada Environmental Response Trust



Stephen R. Clough, P.G., CEM
Emergency Coordinator

CEM Certification Number: 2399, exp. 3/24/17

Enclosures (2)

OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE

Le Petomane XXVII, Inc., Not Individually, But Solely as the Nevada Environmental Response Trust Trustee

35 East Wacker Drive - Suite 1550

Chicago, Illinois 60601

Tel: (312)498-2800

January 6, 2017

St. Rose Dominican Hospital
3001 St Rose Pkwy
Henderson, NV 89052

Subject: RCRA Contingency Plan Update
Nevada Environmental Response Trust (NERT) Site
510 S. Fourth Street
Henderson, Nevada

Dear Sir or Madam:

As part of our requirements as a large quantity generator of hazardous waste, your organization received a copy of a hazardous waste Contingency Plan for the above referenced Site on June 1, 2016, to support emergency services for the Site, should the need arise. This letter provides an updated description of operations associated with generation of hazardous waste and a list of the emergency response equipment available for those operations. No other changes were made to the contingency plan. The Nevada Environmental Response Trust (NERT or Trust) intends to continue conducting operations in a safe and environmentally compliant manner and hopes that your services will never be required for our Site. However, in the event of an emergency, you may be called upon to respond.

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Sincerely,

Office of the Nevada Environmental Response Trust



Stephen R. Clough, P.G., CEM
Emergency Coordinator

CEM Certification Number: 2399, exp. 3/24/17

Enclosures (2)

OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE

Le Petomane XXVII, Inc., Not Individually, But Solely as the Nevada Environmental Response Trust Trustee
35 East Wacker Drive - Suite 1550
Chicago, Illinois 60601
Tel: (312)498-2800

January 6, 2017

City of Henderson Police Department
P.O. Box 95050
Henderson, NV 89009

Subject: RCRA Contingency Plan Update
Nevada Environmental Response Trust (NERT) Site
510 S. Fourth Street
Henderson, Nevada

Dear Sir or Madam:

As part of our requirements as a large quantity generator of hazardous waste, your organization received a copy of a hazardous waste Contingency Plan for the above referenced Site on June 1, 2016, to support emergency services for the Site, should the need arise. This letter provides an updated description of operations associated with generation of hazardous waste and a list of the emergency response equipment available for those operations. No other changes were made to the contingency plan. The Nevada Environmental Response Trust (NERT or Trust) intends to continue conducting operations in a safe and environmentally compliant manner and hopes that your services will never be required for our Site. However, in the event of an emergency, you may be called upon to respond.

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Sincerely,

Office of the Nevada Environmental Response Trust



Stephen R. Clough, P.G., CEM
Emergency Coordinator
CEM Certification Number: 2399, exp. 3/24/17

Enclosures (2)

OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE

Le Petomane XXVII, Inc., Not Individually, But Solely as the Nevada Environmental Response Trust Trustee

35 East Wacker Drive - Suite 1550

Chicago, Illinois 60601

Tel: (312)498-2800

January 6, 2017

Las Vegas Metropolitan Police Department
400 S. Martin L. King Boulevard
Las Vegas, NV 89106

Subject: RCRA Contingency Plan Update
Nevada Environmental Response Trust (NERT) Site
510 S. Fourth Street
Henderson, Nevada

Dear Sir or Madam:

As part of our requirements as a large quantity generator of hazardous waste, your organization received a copy of a hazardous waste Contingency Plan for the above referenced Site on June 1, 2016, to support emergency services for the Site, should the need arise. This letter provides an updated description of operations associated with generation of hazardous waste and a list of the emergency response equipment available for those operations. No other changes were made to the contingency plan. The Nevada Environmental Response Trust (NERT or Trust) intends to continue conducting operations in a safe and environmentally compliant manner and hopes that your services will never be required for our Site. However, in the event of an emergency, you may be called upon to respond.

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Sincerely,

Office of the Nevada Environmental Response Trust



Stephen R. Clough, P.G., CEM
Emergency Coordinator

CEM Certification Number: 2399, exp. 3/24/17

Enclosures (2)

OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE

Le Petomane XXVII, Inc., Not Individually, But Solely as the Nevada Environmental Response Trust Trustee

35 East Wacker Drive - Suite 1550

Chicago, Illinois 60601

Tel: (312)498-2800

January 6, 2017

Clark County Fire Department
575 E. Flamingo Rd.
Las Vegas, NV 89119

Subject: RCRA Contingency Plan Update
Nevada Environmental Response Trust (NERT) Site
510 S. Fourth Street
Henderson, Nevada

Dear Sir or Madam:

As part of our requirements as a large quantity generator of hazardous waste, your organization received a copy of a hazardous waste Contingency Plan for the above referenced Site on June 1, 2016, to support emergency services for the Site, should the need arise. This letter provides an updated description of operations associated with generation of hazardous waste and a list of the emergency response equipment available for those operations. No other changes were made to the contingency plan. The Nevada Environmental Response Trust (NERT or Trust) intends to continue conducting operations in a safe and environmentally compliant manner and hopes that your services will never be required for our Site. However, in the event of an emergency, you may be called upon to respond.

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Sincerely,

Office of the Nevada Environmental Response Trust



Stephen R. Clough, P.G., CEM
Emergency Coordinator

CEM Certification Number: 2399, exp. 3/24/17

Enclosures (2)

\\ECSS134F01\BOU-G\ISAR\CP\R\2\NERT\MXD\JASON_WORKING_FILES\K05-AP-5_POND_REMOVAL\CONTINGENCY_PLAN_MGMT_AREAS.MXD



LEGEND



www.tetrattech.com

1489 West Warm Springs Road, Suite 110
 Henderson, Nevada 89014
 Phone: (702) 966-8340

NEVADA ENVIRONMENTAL RESPONSE TRUST

CONTINGENCY PLAN EQUIPMENT MANAGEMENT AREAS

Project No.: 114-520225

Date: JANUARY 05, 2017

Designed By: CG

Figure No.

1

Nevada Environmental Trust Site – Contingency Plan Emergency Equipment

| Equipment | Capabilities | Location |
|---|---|--|
| Envirogen Technologies Incorporated (ETI) Laboratory | | |
| Spill kit | Spill response equipment includes: 5 lbs. granular sorbent material for acids, 5 lbs. granular sorbent materials for caustics, broom | <ul style="list-style-type: none"> Cupboard in laboratory |
| Fire extinguisher | Tri-class ABC extinguisher | <ul style="list-style-type: none"> Inside laboratory |
| Shower | Standard shower | <ul style="list-style-type: none"> In bathroom next to the laboratory |
| AP-5 Pond Area | | |
| Fire extinguishers | Tri-class (ABC) | <ul style="list-style-type: none"> Adjacent to the less-than-90-day CAA Adjacent to the decontamination area at west side of AP-5 Pond Project job trailer west of AP-5 Pond Each piece of heavy equipment Each company vehicle Next to each generator |
| Spill kits | Heavy-duty 45-gallon plastic container labeled “spill kit,” containing a supply of granular sorbent material, sorbent pads, and sorbent booms | <ul style="list-style-type: none"> Adjacent to the less-than-90-day CAA Project job trailer west of AP-5 Pond |
| Dry cleanup equipment | Broom and shovel | <ul style="list-style-type: none"> Project job trailer west of AP-5 Pond |
| First aid kits | Industrial kit with blood borne pathogen kit for first aid and CPR needs based on American National Standards Institute (ANSI) standards | <ul style="list-style-type: none"> Project job trailer west of AP-5 Pond Adjacent to the less-than-90-day CAA Adjacent to the decontamination area at west side of AP-5 Pond |
| Eye wash stations | 16-gallon capacity designed for a 15-minute flush | <ul style="list-style-type: none"> Adjacent to the less-than-90-day CAA Adjacent to the decontamination area at west side of AP-5 Pond Project job trailer west of AP-5 Pond |
| Eye wash bottles | Portable, 1-quart bottles | <ul style="list-style-type: none"> Adjacent to the less-than-90-day CAA Project job trailer west of AP-5 Pond |
| Decontamination equipment | Decontamination tubs, soapy water, clean water, scrub brushes, wipes, and fire hose | <ul style="list-style-type: none"> West side of AP-5 Pond |

Appendix B

Hazardous Waste Personnel

| Name | Job Title | Job Description |
|--|--|--|
| Steve Clough | Primary Emergency Coordinator, Hazardous Waste Management Team | <ul style="list-style-type: none"> - Understands all duties and responsibilities outlined in this Hazardous Waste Management Plan; - Reviewing and signing waste profiles, manifests, and land disposal restrictions forms; - Tracking manifests returned from the designated disposal facility and preparing exception reports, as needed; |
| Kyle Hansen | Alternate Emergency Coordinator, Hazardous Waste Management Team | <ul style="list-style-type: none"> - Understands all duties and responsibilities outlined in this Hazardous Waste Management Plan. |
| James Walker and Willow Green | Field Operations Leads, Hazardous Waste Management Team | <ul style="list-style-type: none"> - Verifying proper containers and packaging requirements for hazardous waste; - Marking and labeling of the hazardous waste containers while at the Site; and - Maintaining the waste tracking log sheet and coordinating disposal of the containers with waste transportation and disposal vendors. |
| Shanti Montgomery and Michael O'Hare | Field Operations Leads, Hazardous Waste Management Team | <ul style="list-style-type: none"> - Verifying proper containers and packaging requirements for hazardous waste; - Marking and labeling of the hazardous waste containers while at the site; and - Maintaining the waste tracking log sheet and coordinating disposal of the containers with waste transportation and disposal vendors. |

Appendix C Training Outline

Nevada Environmental Response Trust RCRA Training

- 1) Introduction to RCRA (40 CFR 260-268, NAC 444)
 - a) Definition of a solid waste
 - b) Exclusions
 - c) Definition of a hazardous waste
 - i) Listed wastes (F, P, U, K)
 - ii) Characteristic wastes (D)
 - d) Universal wastes
- 2) Waste Characterization Process
 - a) Review exclusions
 - b) Generator/Process knowledge
 - c) Sampling and Analysis
 - i) SW-846 and totals vs. TCLP
 - ii) Representative sampling
 - iii) Disposal facility requirements and profiles
- 3) Generator Requirements
 - a) EPA ID Number
 - b) Generator categories and quantities
 - i) Large quantity generator (LQG) definition
 - ii) Small quantity generator (SQG) definition
 - iii) Conditionally exempt small quantity generator (CESQG) definition
 - c) LQG accumulation areas and inspection requirements
 - i) 90-day accumulation and accumulation start dates
 - ii) Container management, marking, and labeling
 - iii) Container condition
 - iv) Weekly inspection criteria and documentation
 - v) Emergency response equipment
 - d) Satellite Accumulation Areas
 - i) 55-gallon limit
 - ii) Container management, marking, and labeling
 - iii) Point of generation issues

- 4) Contingency Plan
 - a) Role of the Emergency Coordinators
 - b) Arrangements with emergency providers (e.g., fire department and haz mat team).
 - c) Emergency equipment contents and location
 - d) General emergency procedures
 - e) Procedures for fire, spills, and explosions
 - f) Evacuation plan
- 5) Transportation and Disposal
 - a) RCRA waste requirements and correlation to DOT regulations
 - b) Use of labels and use of placards
 - c) Shipping description
 - d) Manifesting requirements
 - i) Manifest contents
 - ii) Land Disposal Restrictions (LDR) forms
 - iii) Exception reporting
- 6) Recordkeeping
 - a) Manifests
 - b) Inspection logs
 - c) Waste analyses
 - d) Discrepancy Report
 - e) Biennial Reports

Appendix D Training Log

TETRA TECH, INC.
EHS TRAINING COURSE SIGN-IN SHEET

| | | | |
|--|---|---------------------------------|--|
| <input checked="" type="checkbox"/> Name of Course: RCRA Generator Training | <input checked="" type="checkbox"/> Location: Various – conference | Course Duration: 2 hours | <input checked="" type="checkbox"/> Date: 5-26-16 |
|--|---|---------------------------------|--|

| | |
|---|--|
| Topics Covered (list or attach agenda): | 3. RCRA generator standards |
| 1. Waste Management Plan (site) including contingency plan | 4. What is a RCRA hazardous waste and what is excluded |
| 2. RCRA waste characterization process (solid waste characteristic and listed criteria) | 5. |

| | | |
|--|--|-------------|
| <input checked="" type="checkbox"/> Instructors: Instructor signature authorizes Electronic-signature on | 1. (Print Name) Jennifer Peters, Environmental Manager, TetEC | (Sign Name) |
| | 2. (Print Name) | (Sign Name) |
| | 3. (Print Name) | (Sign Name) |

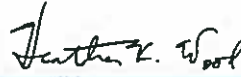
ATTENDEES

| *Employee Number | Print Name | Sign Name | Job Title | Location to mail certificate | Grade (Filled out by instructor only) | |
|------------------|------------------|-----------|----------------|------------------------------|---------------------------------------|----------|
| | | | | | Grade | Initials |
| 1. | Eric J Snow | | SUPERINTENDENT | ERIC.SNOW@TETRA-TECH.COM | | |
| 2. | Shirley Zien | | OPERATOR | | | |
| 3. | Kenneth Varnado | | LABOR | | | |
| 4. | Kyle Quinn | | EHS | | | |
| 5. | Kyle Hansen | | Field Op. Mgr | Kyle.hansen@tetra-tech.com | | |
| 6. | Olivia Carnerale | | Labor | | | |
| 7. | Julia Tobierre | | Laborer | | | |
| 8. | | | | | | |
| 9. | | | | | | |
| 10. | | | | | | |
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| 16. | | | | | | |


ANNUAL AND INITIAL HAZARDOUS WASTE TRAINING

Year: 2017


Training Conducted By: Heather Wood




Digitally signed by Heather Wood
DN: cn=Heather Wood, o, ou=Tetra Tech EM
Inc., email=heather.wood@gmail.com, c=US
Date: 2017.01.06 15:30:00 -0700

| Name | Signature Certifying Training | Date of Hazardous Waste Training |
|----------------|--|----------------------------------|
| STEPHEN CLOUGH |  | 1/6/2017 |
| | | |
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TETRA TECH EC, INC.
EHS TRAINING COURSE SIGN-IN SHEET

| | | | |
|--|--|--|---|
| <input checked="" type="checkbox"/> Name of Course: RCRA Generator Training | <input checked="" type="checkbox"/> Location: NERT Facility | Course Duration: 2 hours | <input checked="" type="checkbox"/> Date: 6-1-16 |
| Topics Covered (list or attach agenda): | | 3. RCRA generator standards | |
| 1. Waste Management Plan (site) including contingency plan review | | 4. What is a RCRA hazardous waste and what is excluded (including definitions) | |
| 2. RCRA waste characterization process (solid waste characteristic and listed criteria) | | 5. | |
| <input checked="" type="checkbox"/> Instructors: Instructor signature authorizes Electronic-signature on | 1. (Print Name) Jennifer Peters, Environmental Manager, TtEC | (Sign Name) |  |
| | 2. (Print Name) | (Sign Name) | |
| | 3. (Print Name) | (Sign Name) | |

ATTENDEES

| *Employee Number | Print Name | Sign Name | Job Title | Location to mail certificate | Grade (Filled out by instructor only) | |
|------------------|----------------|--|-----------------|--|---------------------------------------|----------|
| | | | | | Grade | Initials |
| 1. 01 | STEPHEN CLOUGH |  | REMEDIATION DIR | 510 S. 4TH STREET HENDERSON, NV 89115 | | |
| 2. | | | | | | |
| 3. | | | | | | |
| 4. | | | | | | |
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| 16. | | | | | | |

TETRA TECH, INC.
EHS TRAINING COURSE SIGN-IN SHEET



| | | | |
|---|---|---|---|
| <input checked="" type="checkbox"/> Name of Course: DOT function-specific training course with EPA required topics for containers of hazardous waste | <input checked="" type="checkbox"/> Location: NERT Facility via teleconference | Course Duration: 1 hour | <input checked="" type="checkbox"/> Date: 6-8-16 <i>6/13/16</i> |
| Topics Covered (list or attach agenda): | | 3. Manifesting Requirements - facilitation of signatures and filling in remaining information | |
| 1. Course materials included in the attachments to this sheet | | 4. Placarding bulk containers and placarding requirements | |
| 2. Labeling and marking bulk and non-bulk containers of hazardous waste and TSCA waste including DOT label and EPA labels | | 5. Attaching LDR to first shipment of each waste. | |
| <input checked="" type="checkbox"/> Instructors: Instructor signature authorizes Electronic-signature on | 1. (Print Name) Jennifer Peters, Environmental Manager, Tetra Tech | (Sign Name) | <i>J Peters</i> |
| | 2. (Print Name) | (Sign Name) | |
| | 3. (Print Name) | (Sign Name) | |

ATTENDEES

| *Employee Number | Print Name | Sign Name | Job Title | Grade (Filled out by instructor only) | |
|------------------|---------------|--------------------|------------------------|---------------------------------------|----------|
| | | | | Grade | Initials |
| 1. 503149 | ERIC J. SNOW | <i>[Signature]</i> | PROJECT SUPERINTENDENT | | |
| 2. 502435 | RICHARD QUINN | <i>[Signature]</i> | SITE EHS | | |
| 3. | LARRY DUDUS | <i>[Signature]</i> | TIMOTHY ROSS | | |
| 4. | Josh Drellick | <i>[Signature]</i> | Project Manager | | |
| 5. | | | | | |
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| 15. | | | | | |
| 16. | | | | | |

Year: 2016

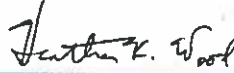
Training Conducted By: Heather Wood

| Name | Signature Certifying Training | Date of Hazardous Waste Training |
|---------------|--|----------------------------------|
| Josh Drellack |  | 1/6/16 |
| LARRY DODG |  | 6-16-16 |
| | | |
| | | |
| | | |
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ANNUAL AND INITIAL HAZARDOUS WASTE TRAINING

Year: 2016

Training Conducted By: Heather Wood



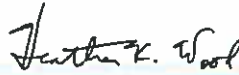
Digitally signed by Heather Wood
DN: cn=Heather Wood, o=Tetra Tech EM
Inc., email=heather.wood@gmail.com, c=US
Date: 2016.07.15 10:41:32 -06'00'

| Name | Signature Certifying Training | Date of Hazardous Waste Training |
|--------------|--|----------------------------------|
| James Walker |  | 7/14/16 |
| Winnon Green |  | 7/14/16 |
| | | |
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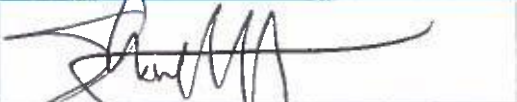
ANNUAL AND INITIAL HAZARDOUS WASTE TRAINING

Year: 2016

Training Conducted By: Heather Wood




Digitally signed by Heather Wood
DN: cn=Heather Wood, o=Tetra Tech EM
Inc, email=heather.wood@gmail.com, c=US
Date: 2016.11.01 17:48:45 -0700

| Name | Signature Certifying Training | Date of Hazardous Waste Training |
|-------------------|--|----------------------------------|
| Shanti Montgomery |  | 11/1/2016 |
| | | |
| | | |
| | | |
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| | | |
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| | | |
| | | |



TETRA TECH EC, INC.
EHS TRAINING COURSE SIGN-IN SHEET

| | | | |
|--|--|---------------------------------|---|
| <input checked="" type="checkbox"/> Name of Course: RCRA Generator Training | <input checked="" type="checkbox"/> Location: NERT Facility | Course Duration: 20 Min. | <input checked="" type="checkbox"/> Date: 11-17-16 |
|--|--|---------------------------------|---|

| | |
|---|--|
| Topics Covered (list or attach agenda): Hazardous Waste Management Plan, NERT Project, Updated October 26, 2016 | 3.RCRA generator standards |
| 1. Waste Management Plan (site) including contingency plan review | 4. What is a RCRA hazardous waste and what is excluded (including definitions) |
| 2. RCRA waste characterization process (solid waste characteristic and listed criteria) | 5. CAA and SAA Accumulation Areas |

| | | |
|--|------------------------------------|--|
| <input checked="" type="checkbox"/> Instructors: Instructor signature authorizes Electronic-signature on | 1. (Print Name) Jennifer Peters | (Sign Name) <u></u> |
| | 2. (Print Name) | (Sign Name) |
| | 3. (Print Name) | (Sign Name) |

ATTENDEES

| *Employee Number | Print Name | Sign Name | Job Title | Location to mail certificate | Grade (Filled out by instructor only) | |
|------------------|----------------|--|----------------------|--|---------------------------------------|----------|
| | | | | | Grade | Initials |
| 1. | Michael O'Hare |  | Asst Project Manager | 510 South 4 th St Henderson NV 89015 | | |
| 2. | | | | | | |
| 3. | | | | | | |
| 4. | | | | | | |
| 5. | | | | | | |
| 6. | | | | | | |
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| 13. | | | | | | |
| 14. | | | | | | |
| 15. | | | | | | |
| 16. | | | | | | |

Failure to provide all necessary information will hold up training certificate distribution.

TRAINING CERTIFICATION

This certifies that

Shanti Montgomery

Has successfully completed the following training:

DOT & IATA EMPLOYEE TRAINING PROGRAM
DOT/HM-126F HAZMAT TRAINING 49 CFR 172, SUBPART H

Date(s) December 20, 2016

Instruct *Jennifer Peters*

Location On-Line Course

Jennifer Peters
Environmental Manager, TtEC



Appendix E Hazardous Wastes Generated

| Stream # | Short Waste Desc | Waste Category | Waste Code | Waste Description | Waste Characterization Basis | Sample ID(s) and Report Number(s) | Destination Facility |
|----------|---|------------------|------------|---|---|--|--|
| D05-01 | Construction debris | Nonhazardous | n/a | Nonhazardous construction and demolition debris and trash: plastic, metal, fiberglass, wood, painted wood (not lead-based paint per HAZMAT Survey), and bird droppings. | Pre-Demolition Hazardous Materials Inspection Unit 1 Chlorinator Building and Cell Basement (Tetra Tech 2016) report confirmed via XRF analyses that painted wood and non-wood materials in this waste stream do not contain lead-based paint (Section 4.2.1 of the report) as defined by EPA. | No sampling required. Product and process knowledge that materials are inert debris and HAZMAT Survey for lead-based paint are sufficient. | Republic Services - Apex Landfill, Las Vegas, NV |
| D05-02 | Concrete debris | Nonhazardous | n/a | Concrete debris generated from demolition of West End Unit 1 Chlorinator Building, floors 2, 3, and 4 | Three composite samples were collected on July 26, 2016 and analyzed for TCLP VOCs, TCLP SVOCs, TCLP RCRA 8 metals, total PCBs (including Aroclor 1268), perchlorate, and chlorate. All VOCs, SVOCs, and PCBs were non-detect. For RCRA metals there were hits in all three samples for barium and chromium; however, all results were below RCRA regulatory levels. Sample data also reported very low levels of chlorate and perchlorate. | Sample ID(s): 2nd Floor Concrete; 3rd Floor Concrete; and 4th Floor Concrete. Data report(s): J153750-1 | Service Rock Products - Henderson, Nevada |
| D05-03 | Scrap metal, including painted metal with LBP | Nonhazardous | n/a | Scrap metal (steel, etc.) from building – structural and equipment or component metal, including painted metal with lead-based paint | <i>Pre-Demolition Hazardous Materials Inspection Unit 1 Chlorinator Building and Cell Basement</i> (Tetra Tech 2016) report confirms in Section 6.2 (Lead Based Paint) that “Materials that are recycled, such as metal components are not subject to waste characterization provisions under EPA, but proper disclosure of lead containing materials should be provided to the recycling facility for hazard communication purposes.” Before shipment, Tetra Tech will provide notice to the scrap metal recycler that certain materials contain lead-based paint. | No sampling required. | Desert Recycling - Las Vegas, NV |
| D05-04 | Mercury vapor lamps | Universal | n/a | Mercury vapor lamps | Safety Data Sheet for mercury vapor lamps. Intact lamps may be managed under the Universal Waste Rules rather than full RCRA hazardous waste rules. | No sampling required. | Veolia ES Technical Solutions, Phoenix, AZ |
| D05-05 | Non-friable asbestos gaskets | Nonhazardous | n/a | Non-friable asbestos gaskets (intact gaskets sandwiched within flanges). | <i>Pre-Demolition Hazardous Materials Inspection Unit 1 Chlorinator Building and Cell Basement</i> (Tetra Tech 2016) report confirms asbestos-containing materials in Section 4.1.1. | No sampling required (asbestos). | Republic Services - Apex Landfill, Las Vegas, NV |
| ETI-01 | Used oil | Nonhazardous | n/a | Used oil generated during maintenance of compressors and pumps | Used oil is managed according to the provisions of 40 CFR 279. | No sampling required. | |
| ETI-02 | Waste residue from aerosol cans | Hazardous | D001 | Residue generated during puncture of aerosol cans of paint and lubricants | Safety Data Sheet for paints and lubricants. | No sampling required. | |
| ETI-04 | Wastewater treatment FBR sludge | Nonhazardous | n/a | Sludge from the filter press, generated during biological reduction wastewater treatment. | The sludge is sampled and analyzed every 3 years for a special waste authorization. During the most recent sampling in June 2016, it was analyzed for TCLP metals and TCLP VOCs and was determined to be nonhazardous. | Sample ID(s): FBR Bio Solids Data Report(s): J149697-1 | Republic Services - Apex Landfill, Las Vegas, NV |
| ETI-05 | Filter cake from Cr removal | Nonhazardous | n/a | Sludge from the filter press, generated during wastewater treatment for chromium removal. | The sludge is sampled and analyzed every 3 years for a special waste authorization. During the most recent sampling in April 2016, it was analyzed for TCLP metals and TCLP VOCs and was determined to be nonhazardous. | Sample ID(s): IRON OXIDE BIN 0097 Data Report(s): J145121-1 | Republic Services - Apex Landfill, Las Vegas, NV |
| ETI-06 | Lab pack wastes | Hazardous | various | Lab pack initiated during cleanout of maintenance building | Waste determination was based on labels and material safety data sheets | No sampling required. | Clean Harbors, Aragonite, UT |

| Stream # | Short Waste Desc | Waste Category | Waste Code | Waste Description | Waste Characterization Basis | Sample ID(s) and Report Number(s) | Destination Facility |
|-------------|--|----------------|------------|--|---|---|--|
| K01-01 | Masonry/concrete blast walls | Nonhazardous | n/a | Masonry/Concrete generated during demolition of the blast walls (9/6/16) | One 4-point composite sample was collected on 9/14/16, for an estimated 21 CY, as described in SMP Section 4.2.2.1. Blast walls were in ECA D8 so samples were analyzed for the chemicals of concern for D8--asbestos, metals, hex chromium, perchlorate, pH, dioxins/furans, SVOCs, and chloride. Samples were also analyzed for flashpoint/ignitability and VOCs as may be required by disposal facility. No regulatory or project thresholds were exceeded. | Sample ID(s): BlastWall-SP-1- 20160914. Data Report(s): J158601-1 (all data except dioxin/furan data) and J158601-2 (just dioxin/furan data) | Republic Services - Apex Landfill, Las Vegas, NV |
| K01-02 | Concrete pads/foundations | Nonhazardous | n/a | Concrete generated during removal of the concrete pads/foundations for upcoming IRM activities (9/7/16-9/12/16) | see K01-01 | see K01-01 | Republic Services - Apex Landfill, Las Vegas, NV |
| K01-03 | Asphalt pads | Nonhazardous | n/a | Asphalt generated during removal of the asphalt pads for upcoming IRM activities (9/7/16 - 9/12/16) | see K01-01 | see K01-01 | Republic Services - Apex Landfill, Las Vegas, NV |
| K01-04 | Road base material removed during trenching | Nonhazardous | n/a | Soil (road base material) removed from ECAs 6 and 8 during the trenching for the installation of water lines for extraction well system (9/13/16) | One 4-point composite soil sample was collected on 9/14/16, for an estimated 16 CY, as described in SMP Section 4.2.2.1. Trench was across ECAs D6 and D8 so samples were analyzed for the more conservative chemicals of concern for D8--asbestos, metals, hex chromium, perchlorate, pH, dioxins/furans, SVOCs, and chloride. Samples were also analyzed for flashpoint/ignitability and VOCs as may be required by disposal facility. No regulatory or project thresholds were exceeded. | Sample ID(s): Trench-SP-1-20160914. Data Report(s): J158601-1 | Republic Services - Apex Landfill, Las Vegas, NV |
| K01-soil-01 | Soil cuttings | Nonhazardous | n/a | Soil cuttings from drilling operations, soil flushing IRM soil borings, and well installations | Two composite samples were collected -- one from bin RT4576 on 7/14/2016 and composited from bins 508, RT4560, 501, and RT4570 on 8/10/16. The samples were submitted for analysis of VOCs,TPH carbon range C6-C40, Title 22 Metals, perchlorate, and hexavalent chromium. The second composite sample was also tested for chlorate and ignitability. No regulatory or project thresholds were exceeded. | Sample ID(s): IDW-RT4576, IDW-2-20160810 Data Report(s): 152875-1, 155352-1 | Republic Services - Apex Landfill, Las Vegas, NV |
| K01-soil-08 | AP-5 baseline soil cuttings | Nonhazardous | n/a | Soil cuttings from drilling operations, AP-5 area baseline source area characterization. All AP Area baseline source area characterization soil was generated from either ECAs D7, D8, and D5, or from non-ECAs in the AP-5 Area. The vast majority of excavated soil came from non-ECA areas. | see K01-soil-01 | see K01-soil-01 | Republic Services - Apex Landfill, Las Vegas, NV |
| K05-01 | Concrete removed during construction of berm | Nonhazardous | n/a | Approximately 50 CY of concrete removed during construction of the berm north of the three 600,000-gallon Process Tanks; non- ECA area (2 piles) | Concrete located outside of an ECA, and generator has assumed that it is clean. | No sampling required. Product and process knowledge are sufficient. | Republic Services - Apex Landfill, Las Vegas, NV |
| K05-02 | Asphalt removed during construction of berm | Nonhazardous | n/a | Approximately 100 CY of asphalt removed during construction of the berm north of the three 600,000-gallon Process Tanks; non-ECA area (2 piles) | see K05-01 | see K05-01 | Republic Services - Apex Landfill, Las Vegas, NV |
| K05-03 | Diesel-impacted soil (10/28/16) | Nonhazardous | n/a | Diesel-impacted soil generated from a release of approximately 2 gallons of fuel from a cracked fuel filter on a water truck on 10/28/16 (est 0.5 CY). | Spill was not in an ECA, and diesel fuel does not contain hazardous constituents. | No sampling required. Product and process knowledge are sufficient. | Republic Services - Apex Landfill, Las Vegas, NV |

| Stream # | Short Waste Desc | Waste Category | Waste Code | Waste Description | Waste Characterization Basis | Sample ID(s) and Report Number(s) | Destination Facility |
|----------|-----------------------------------|----------------|------------|---|---|---|--|
| K05-04 | Porous objects | Hazardous | D001 | Porous objects (rope, miscellaneous plastic, trash, liner, and wood pieces) from AP-5 Pond | It is presumed, as a conservative measure, that the objects could contain residual ammonium perchlorate (AP) at less than 1% concentration, which may present the hazard of ignitibility. Due to the nature of the materials, they cannot be fully inspected by technicians and confirmed as free of contamination. | No sampling required. Product and process knowledge are sufficient. | US Ecology Landfill, Beatty, NV |
| K05-05 | Treatment system equip and solids | Nonhazardous | n/a | Treatment system process equipment and solids mixing and transfer infrastructure debris, including HDPE piping ranging from 2 inches in diameter to 12 inches in diameter; plastic and neoprene hose; poly tubing; metal; PVC pallets; metal and non-metallic walkway grating; wooden telephone poles; electrical conduit; wire; various metal, HDPE, and PVC pipe fittings and valves; plastic liner; and pump parts. | Objects are been removed, sized, cleaned, and visually inspected/confirmed free of residual AP per the NERT AP-5 Pond Abandoned Equipment Work Plan and AP-5 Pond Object Removal Procedures . | No sampling required. Product and process knowledge are sufficient. | Republic Services - Apex Landfill, Las Vegas, NV |
| K05-06 | Diesel-impacted soil (11/10/16) | Nonhazardous | n/a | Diesel-impacted soil generated from a release of approximately 2 gallons of fuel during refueling of a crane on 11/10/16 (est 1 CY). | Spill was not in an ECA, and diesel fuel does not contain hazardous constituents. | No sampling required. Product and process knowledge are sufficient. | Republic Services - Apex Landfill, Las Vegas, NV |
| K05-07 | Weathered utility poles | Nonhazardous | n/a | During the AP-5 pond remediation project, three wooden power poles located adjacent to the pond that are no longer in use will be removed and disposed of off-site. The project is not able to reuse the poles on site. It is estimated that the three poles will comprise approximately 10 cubic yards of waste. They will be resized for disposal, and any resulting wood chips will be collected and disposed of with the poles. | The areas where the three poles will be removed from are not located within the pond or pond liner and containment area and are not anticipated to be contaminated from activities performed at the AP-5 pond or pond contaminants. The poles will be removed from the ground and any adhering loose soil from the below-ground portion of the poles will be removed and left in place on the ground at the respective locations. | No sampling required. Product and process knowledge are sufficient. | Republic Services - Apex Landfill, Las Vegas, NV |
| K05-08 | Oily decontamination water | Nonhazardous | n/a | During the decontamination and resizing of metal debris from the AP-5 pond, used oil from a pump was released into the tank of decontamination water. Because the water was contaminated with oil, it could not be treated in the onsite WWTP. The water was contained and profiled for offsite disposal | Because of the relative volumes of oil and water and because of the nature of the oil (compressor oil), the water is not expected to have become hazardous waste from the release of oil. The water consists of potable City water with trace amounts of perchlorate derived from decontamination activities. The water is not expected to be ignitable. | No sampling required. Product and process knowledge are sufficient. | TBD |
| M02-01 | Fluorescent lamps | Universal | n/a | 4-foot fluorescent lamps (intact), removed from fixtures prior to demolition of the Unit 4 Cell Building. | Safety Data Sheet for fluorescent lamps. Intact lamps may be managed under the Universal Waste Rules rather than full RCRA hazardous waste rules. | No sampling required. | Veolia ES Technical Solutions, Phoenix, AZ |
| M02-02 | Non-leaking PCB ballasts | PCB | n/a | Fluorescent lamp ballasts (intact), removed from fixtures prior to demolition of the Unit 4 Cell Building. | PCBs are not regulated as RCRA hazardous waste per 40 CFR 260-262 and equivalent state regulation. Ballasts that were suspected of containing PCBs and were either not labeled or not identified with labeling specifying "PCB-Free," were assumed to be PCB-containing. None of the PCB ballasts are leaking. | No sampling required. | US Ecology Landfill, Beatty, NV |

| Stream # | Short Waste Desc | Waste Category | Waste Code | Waste Description | Waste Characterization Basis | Sample ID(s) and Report Number(s) | Destination Facility |
|----------|---------------------------------------|------------------|------------|--|--|---|--|
| M02-03 | Structural steel with LBP & Galbestos | Nonhazardous | n/a | Structural steel painted with LBP with asbestos-containing mastic attached and Galbestos siding | <p>EPA has stated that debris consisting of solid architectural components coated with LBP are unlikely to be hazardous waste because of the small ratio of lead paint to total waste mass. The US Army conducted a study which concluded that whole-building demolition debris is not likely to exceed TCLP limits for lead if it is handled as a single, whole waste stream and disposed of all together. Whole-building demolition debris is therefore considered a non-hazardous waste with regard to lead.</p> <p>The Pre-demolition Hazardous Materials Inspection report dated December 3, 2015, indicated Galbestos siding contains LBP and is an asbestos-containing material. A sample was collected on February 29, 2016, and was analyzed for total lead, TCLP lead, and PCBs. No regulatory or project thresholds were exceeded.</p> | <p>Sample ID(s): Unit 4 Galbestos, Unit 4 Galbestos (2)</p> <p>Data Report(s): 139535-1, 139535-2, and 144278-1</p> | Republic Services - Apex Landfill, Las Vegas, NV |
| M02-04 | Construction debris | Nonhazardous | n/a | Concrete debris generated from demolition of first floor slabs | Ten composite samples were collected May 22, 2016, and analyzed for TCLP VOCs, TCLP SVOCs, TCLP RCRA 8 metals, Total PCBs (including Aroclor 1268), perchlorate, and chlorate. No regulatory or project thresholds were exceeded. | <p>Sample ID(s): SP-1-1, SP-2-1, SP-2-2, SP-2-3, SP-2-4, SP-2-5, SP-3-1, SP-3-2, SP-3-3, and SP-3-4</p> <p>Data Report(s): 440-148230-1</p> | Republic Services - Apex Landfill, Las Vegas, NV |
| M02-05 | NH northern pipes with Cr | Nonhazardous | n/a | PVC pipe and valves and non-metallic walkway grating formerly associated with the AST previously northwest of the Unit 4 Cell Building; plastic covered plywood used during demolition for shoring; rebar; and steel piping and piping from SW and SE pipe ends. | Samples were collected on December 29, 2015. All samples were analyzed for VOCs, SVOCs, PCBs, RCRA 8 Metals, hexavalent chromium, perchlorate, ammonia, pH, and cyanide. No regulatory or project thresholds were exceeded. | <p>Sample ID(s): SW #1 and SW #2; SE #1 and SE #2 (piping)</p> <p>Data Report(s): 139377-1 and 146643-2</p> | Republic Services - Apex Landfill, Las Vegas, NV |
| M02-06 | Haz northern pipes with Cr | Hazardous | D001, D007 | The northernmost two pipes the Unit 4 Cell Building (see M02-05) | Samples were collected on December 29, 2015. The samples were analyzed for VOCs, SVOCs, PCBs, RCRA 8 Metals, hexavalent chromium, perchlorate, ammonia, pH, and cyanide. After failing 20x rule for chromium and lead, NW #1, NW #2, N #1 Mid, NE #1, and NE #2 samples were recollected on February 24, 2016, for additional testing to include TCLP VOCs, TCLP SVOCs, TCLP RCRA 8 Metals, and Total PCBs. These results indicate TCLP chromium at 51 mg/L for NW #1, 93 mg/L for NW #2, 46 mg/L for N #1 Mid, 140 mg/L for NE #1, and 160 mg/L for NE #2. All samples passed TCLP for lead. Previous sampling of the piping contents indicated perchlorate concentrations ranged from 0.28% to 2%. The Chemist professional opinion is that this concentration of perchlorates inside piping residue/sediment may be characteristically ignitable. | <p>Sample ID(s): NW #1, NW #2, N #1 Mid, NE #1, and NE #2</p> <p>Data Report(s): 132550-1 and 139377-1</p> | US Ecology Landfill, Beatty, NV |

| Stream # | Short Waste Desc | Waste Category | Waste Code | Waste Description | Waste Characterization Basis | Sample ID(s) and Report Number(s) | Destination Facility |
|----------|--|------------------|------------|--|---|--|---------------------------------|
| M02-07 | Electrolytic cell debris w/Cr | Hazardous | D007 | Concrete inner linings and steel outer shells from 10 electrolytic cell vessels formerly in basement of Unit 4 Cell Building | <p>Sample data was collected for concrete lining of electrolytic cells (composite samples) on May 9, 2016. The samples were analyzed for TCLP RCRA 8 metals, TCLP VOCs, TCLP Semi - VOCs, PCBs, chlorates, and perchlorates. TCLP analysis found 8.4 mg/L chromium and 0.50 mg/L barium. As a result, NERT considers the electrolytic cell vessel lining debris characteristically hazardous for chromium. Electrolytic cell lining Sample ID "Unit 4 Elec. Cell Debris" contained 1.1% total perchlorate and 0.72% total chlorate. The waste is not considered characteristically ignitable or reactive.</p> <p>The outer steel linings of the electrolytic cells represent not more than 33% of the total mass of the waste stream. The extremely rusted and degraded appearance of the steel suggests that it also would exhibit elevated concentrations of chromium. Based upon the degraded appearance of the steel, and because the steel represents a low percentage of total waste stream mass, NERT also considers the steel linings D007 (chromium) characteristic waste.</p> | <p>Sample ID(s): Unit 4 Elec. Cell Debris</p> <p>Data Report(s): 146858-1</p> | US Ecology Landfill, Beatty, NV |
| M02-08 | Perchlorate residue in electrolytic cell vessels | Hazardous | D001, D007 | Perchlorate material in one of ten electrolytic cell vessels | <p>A sample of the material was collected on May 9, 2016, and analyzed for chlorate and perchlorate. Sample exhibited 610 mg/kg (0.061%) chlorate and 120,000 mg/kg (12%) perchlorate. Based on the concentration of perchlorate and the physical properties (powder residue), NERT considers this waste likely to be characteristically ignitable. The material also was analyzed for TCLP metals. Chromium was observed at a concentration of 8.4 mg/L. Based on this analysis, NERT considers this waste characteristically hazardous for chromium.</p> <p>At the direction of the destination facility, the material is treated in its container to remove the characteristic of reactivity. It is stabilized by adding water to the container.</p> | <p>Sample ID(s): E. Cell Layer</p> <p>Data Report(s): 146858-1 and 146858-2</p> | Clean Harbors, Aragonite, UT |
| M02-10 | Sediments from excavation of utility tunnel | Hazardous | D001 | Following demolition of the Unit 4 Cell Building floor, three voids and a tunnel were discovered on the southwest side of the Unit 4 basement, and one void and tunnel were discovered on the southeast side of the Unit 4 basement. Tt Staff and equipment created access to the voids and tunnels using an excavator equipped with hydraulic hammer to facilitate installation of 8-inch diameter stand pipes to provide drilling access from the basement floor through the sub-basement floor to freely access the underlying soil. Subsequent to demolition and removal of the concrete floor immediately above the voids and tunnels, sediment was discovered. | <p>On July 19, 2016, Tetra Tech collected one grab sample from the sediments removed from the utility tunnel void. The sample was analyzed for total perchlorate, chlorates, TCLP VOCs, TCLP SVOCs, and PCBs (including Aroclor 1268). Because of the concentration of chlorates in the sediment (1.5%), NERT considers this waste to be characteristically hazardous waste as an oxidizer and assigned the waste code D001.</p> | <p>Sample ID(s): Utility Tunnel Sediment.</p> <p>Data Report(s): J153245-1 and J153245-2</p> | US Ecology Landfill, Beatty, NV |

| Stream # | Short Waste Desc | Waste Category | Waste Code | Waste Description | Waste Characterization Basis | Sample ID(s) and Report Number(s) | Destination Facility |
|----------|--|----------------|------------|--|--|---|--|
| M02-11 | Soil cuttings from Unit 4 investigation | Nonhazardous | n/a | Beginning on June 27, 2016, these cuttings were generated during the advancement of 72 boreholes and installation of one monitoring well related to the Units 4 and 5 Investigation second mobilization. | Five composite samples were collected from each of the five rolloff containers between 7/15/16 and 10/17/16. The samples were analyzed for total VOCs, SVOCs, OC pesticides, PCBs, total RCRA 8 metals, perchlorate, flashpoint ignitability, and pH. In addition, samples were analyzed using for TCLP VOCs and metals. All samples passed TCLP for VOCs and metals. Perchlorate concentrations were less than 1,200 mg/Kg, below the project threshold of 5% for ignitability and reactivity. Flashpoint testing determined that the material was "not ignitable." | Sample ID(s): CHHP20185, CHHP21196, CHHP21350, CHHP21367, CHHP20532 Data Report(s): J155003-1, J152934-2, J152934-3, J155869-1, J157644-1, J162211-1 | Republic Services - Apex Landfill, Las Vegas, NV |
| M02-12 | Concrete cores from Unit 4 investigation | Nonhazardous | n/a | Beginning on June 27, 2016, these cuttings were generated during the advancement of 72 boreholes and installation of one monitoring well related to the Units 4 and 5 Investigation second mobilization. | One composite sample was collected on August 16, 2016. The sample was analyzed for total and TCLP VOCs, total and TCLP RCRA 8 metals, perchlorate, flashpoint ignitability, and pH. A second sample was collected on September 6, 2016. It was also analyzed for SVOCs, OC pesticides, and PCBs. | Sample ID(s): U4U5-Concrete Cores-16-08-2016, CONCRETE CORES Data Report(s): J155817-1, J157648-1 | Republic Services - Apex Landfill, Las Vegas, NV |

Appendix F Waste Tracking Log

| Container No. | Accumulation Start Date ¹ | CAA Name and Location | Date waste MUST be shipped to the TSDF ² | Manifest number | Date waste collected | Date final manifest copy received ³ | Final weight of waste per manifest (facility weight) |
|---------------|--------------------------------------|-----------------------|---|-----------------|----------------------|--|--|
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¹ Accumulation Start Date (ASD)– date **first** waste are placed into the waste disposal container. This will remain constant until the container is collected for disposal.

² ASD + 90 days

³ If original manifest is not received back within 35 days of date waste collected, begin tracking its location and implement exception reporting requirements as specified in Waste Management Plan.

Appendix G

Weekly Inspection Log

Weekly Inspection Checklist – CAA Name: _____

For the Month

for Hazardous Waste Container Accumulation Area

_____, 20__

| | Date | Time | Inspector's Printed Name AND Signature |
|---------------|------|------|--|
| Week 1 | / / | | |
| Week 2 | / / | | |
| Week 3 | / / | | |
| Week 4 | / / | | |
| Week 5 | / / | | |

| Mark answers Yes or No below | | | | | |
|------------------------------|--------|--------|--------|--------|---|
| Week 1 | Week 2 | Week 3 | Week 4 | Week 5 | |
| | | | | | Are containers marked or labeled as "hazardous waste"? |
| | | | | | Are containers marked with the hazardous waste code? |
| | | | | | Are containers marked with the accumulation start date? |
| | | | | | Are any containers near to or exceeding the LQG 90-day timeframe? |
| | | | | | Are container labels visible and readable? |
| | | | | | Are containers kept closed except when being actively used for placement of waste? |
| | | | | | Are containers in good condition? |
| | | | | | Are any containers leaking? |
| Satellite Accumulation Areas | | | | | |
| | | | | | Are containers marked or labeled as "hazardous waste"? |
| | | | | | Are containers marked with the hazardous waste code? |
| | | | | | Are containers kept closed except when being actively used for placement of waste? |
| | | | | | Are any containers leaking? |
| | | | | | Are the containers at the point of generation? |
| | | | | | Does any SAA have more than 55 gallons of waste? |
| Universal Waste/PCBs | | | | | |
| | | | | | Are containers of universal waste and PCB ballasts closed? |
| | | | | | Are containers marked with an accumulation start date? |
| | | | | | Are universal waste containers labeled as "used lamps" or "used batteries," as appropriate? |
| | | | | | Are any universal waste containers near to or exceeding the 1-year timeframe? |
| | | | | | Are PCB containers marked with the "Caution PCBs" label? |
| | | | | | Are PCB containers near to or exceeding the 180-day timeframe? |

Appendix H

Approved Disposal Facilities

| Approved Disposal Facilities | | |
|-------------------------------|--|---|
| Facility | Location | EPA# |
| Clean Harbors | 11600 N. Aptus Road Aragonite, Utah 84029 | UTD981552177 |
| Desert Recycling | 2570 Marco Street Las Vegas, Nevada 89115 | Not a hazardous waste disposal facility |
| Republic Services | Apex Regional Landfill 13550 N. Highway 93 Las Vegas, Nevada 89165 | Not a hazardous waste disposal facility |
| Service Rock Products | 151 Cassia Way Henderson, Nevada 89014 | Not a hazardous waste disposal facility |
| US Ecology | Highway 95 Beatty, Nevada 89003 | NVT330010000 |
| Veolia ES Technical Solutions | 5736 W. Jefferson Street Phoenix, Arizona 85043 | AZ0000337360 |