ABOVEGROUND STORAGE TANK
CLOSURE REPORT
SILVER STRIKE MOTEL
201 NORTH MAIN STREET
TONOPAH, NEVADA
SPILL REPORT NO. 050422-01

PREPARED FOR:
Nevada Division of Environmental Protection
Brownfields Program
901 South Stewart Street, Suite 4001
Carson City, Nevada 89701

PREPARED BY:
Ninyo & Moore
Geotechnical and Environmental Sciences Consultants
6700 Paradise Road, Suite E
Las Vegas, Nevada 89119

June 27, 2005
Project No. 301218004
June 27, 2005
Project No. 301218004

Mr. Scott Smale
Nevada Division of Environmental Protection
Brownfields Program
901 South Stewart Street, Suite 4001
Carson City, Nevada 89701

Subject: Aboveground Storage Tank Closure Report
        Silver Strike Motel
        201 North Main Street
        Tonopah, Nevada
        Spill Report # 050422-01

Dear Mr. Smale:

In accordance with your request, Ninyo & Moore is pleased to present this Aboveground Storage Tank (AST) Closure Report for the above-referenced site. Enclosed is the data collected from the soil sampling activities provided in connection with the removal of one AST at the above referenced facility. The general location of the subject site is shown on Figure 1.

DESCRIPTION OF AST REMOVAL
On April 18, 2005, LVI Environmental of Nevada (LVI) disconnected and removed an approximately 1,000-gallon steel heating oil AST from the subject site. Prior to removal of the AST, approximately 1 gallon of heating oil was drained from the AST and placed in a 5-gallon pail. The tank was placed on a truck and delivered to Saftly Kleen Systems, Inc. in Las Vegas, Nevada for destruction. The location of the AST at the site is presented on Figure 2. A copy of the disposal certificate is enclosed in Appendix A.

NEVADA ENVIRONMENTAL REGULATIONS
The Nevada Division of Environmental Protection (NDEP) has established a state action level of 100 milligrams per kilogram (mg/kg) for total petroleum hydrocarbons (TPH) in soil and a
reportable quantity of 3 cubic yards of soil. If a petroleum substance is encountered, the “soil action level” is defined as the presence of a petroleum substance in the soil in excess of 100 mg/kg when analyzed for TPH by EPA Method 8015. In the event that concentrations exceed 100 mg/kg in a volume exceeding 3 cubic yards of soil, a report should be filed with NDEP within 24 hours.

INITIAL ABATEMENT ACTIONS
While performing a Phase I Environmental Site Assessment (ESA) of the subject site on March 8, 2003, Mr. Robert Troisi of Ninyo & Moore observed and reported an AST adjacent to Building 5. Upon further visual observations, Mr. Troisi observed that the AST had leaked and noted stained soil at the south end of the tank. A surface soil sample was collected in the vicinity of the stained soil and sent to Alpha Analytical Laboratories for TPH analysis. Analytical results indicated that the concentration of TPH in the soil sample exceeded the state action level of 100 milligrams per kilogram (mg/kg).

LVI was contracted to remove the AST, excavate contaminated soil, and backfill the excavation. On April 20, 2005, following removal of the AST, a small-scale initial abatement action began using a backhoe to excavate the contaminated soil in the former AST location. LVI excavated approximately 21.22 tons of contaminated soil and placed it in a stockpile on the concrete north of the excavation area. Following excavation, Ninyo & Moore collected a soil sample from a depth of 3 feet below the ground surface (bgs) at the north end of the excavation area, a soil sample from a depth of 2 feet below the ground surface at the southeast corner of the excavation area, and a third sample from the soil stockpile north of the excavation area. The soil samples were placed in laboratory-supplied glass jars and capped with Teflon®-lined lids. The jars were immediately labeled and placed in an ice chest that was cooled to approximately 4°C. The samples were delivered to Veritas Laboratories using standard EPA chain-of-custody protocol and submitted for TPH analysis by EPA Method 8015.
ANALYTICAL RESULTS

Analytical results from soil samples collected from April 20, 2005, are summarized in the following table:

<table>
<thead>
<tr>
<th>Sample ID</th>
<th>Sample Location</th>
<th>Concentration (mg/kg)</th>
<th>Range</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stockpile-01</td>
<td>Stockpile of excavated soil</td>
<td>&lt;10</td>
<td>GRO</td>
</tr>
<tr>
<td></td>
<td></td>
<td>63</td>
<td>DRO</td>
</tr>
<tr>
<td></td>
<td></td>
<td>55</td>
<td>ORO</td>
</tr>
<tr>
<td>North at 3' BGS - 02</td>
<td>North at 3 feet below ground surface</td>
<td>&lt;10</td>
<td>GRO</td>
</tr>
<tr>
<td></td>
<td></td>
<td>&lt;20</td>
<td>DRO</td>
</tr>
<tr>
<td></td>
<td></td>
<td>&lt;20</td>
<td>ORO</td>
</tr>
<tr>
<td>SE Corner at 2' BGS - 03</td>
<td>Southeast corner at 2 feet below ground surface</td>
<td>&lt;10</td>
<td>GRO</td>
</tr>
<tr>
<td></td>
<td></td>
<td>79</td>
<td>DRO</td>
</tr>
<tr>
<td></td>
<td></td>
<td>208</td>
<td>ORO</td>
</tr>
</tbody>
</table>

GRO - Gasoline Range Organics, DRO - Diesel Range Organics, ORO - Oil Range Organics

The laboratory reports presenting sample identification, test results, date, and reporting limits are enclosed in Appendix B.

SECONDARY ABATEMENT ACTIONS

The reported TPH concentration in the sample collected from the southeast corner of the excavation at a depth of 2 feet bgs exceeded the state action level of 100 mg/kg. Therefore, on April 21, 2005, further excavation of approximately 0.88 tons of soil from the southeast corner of the excavation area was undertaken by LVI. Following the excavation, a second soil sample was collected from this area at a depth of approximately 5 feet bgs and analyzed for TPH. Analytical results from the soil sample collected on April 21, 2005, indicated that the TPH concentration was below laboratory reporting limits as shown in the following table. On April 22, 2005, the excavation was backfilled with clean fill to match the existing grade.
CONCLUSIONS AND RECOMMENDATIONS

Ninyo and Moore observed the removal of one 1,000-gallon heating oil AST and excavation and removal of approximately 22.10 tons of TPH-contaminated soil. Based on our observations and soil analytical results collected from the AST excavation, there was evidence of leakage of a reportable quantity of heating oil from the south end of the AST system. NDEP was informed of the release in accordance with Nevada Administrative Code (NAC) 445A.347. Following excavation of contaminated soil, soil samples were collected from the excavation and analyzed for TPH. Analytical results indicated that the TPH concentration of the soil was below laboratory reporting limits. Considering the results of this assessment and our conclusions, we recommend the subject site be granted regulatory closure.

LIMITATIONS

The services outlined in this report have been conducted in a manner generally consistent with current regulatory guidelines and standard industry practice. No other warranty, expressed or implied, is made regarding the professional opinions presented in this report. Ninyo & Moore’s opinions are based on the observed conditions and laboratory results. It is likely that variations in the soil conditions may exist which were beyond our scope of work.

The samples collected, chemically analyzed, and the observations made are believed to be representative of the general area, however, conditions can vary significantly between sampling locations. The interpretations and opinions contained in this report are based on the results of laboratory tests and analyses intended to detect the presence and measure the concentrations of specific chemical constituents in samples collected from the site. The analyses have been
conducted by an independent laboratory. Ninyo & Moore has no involvement in, or control over, such analyses and has no means of controlling the accuracy of the laboratory results. Ninyo & Moore, therefore, disclaim any responsibility for inaccuracy in such laboratory results.

This document is intended to be used only in its entirety. No portion of the document, by itself, is designed to completely represent any aspect of the project described herein. Ninyo & Moore should be contacted if the reader requires any additional information, or has questions regarding content, interpretations presented, or completeness of this document. Opinions and judgements expressed herein, which are based on our understanding and interpretation of current regulatory standards, should not be construed as legal opinions.

NEVADA CERTIFIED ENVIRONMENTAL MANAGER

In accordance with the Nevada Revised Statutes 459.500, Section 1, a holder of a certificate who is responsible for a service requiring certification shall ensure that each document relating to the service includes the following language:

I, Gregory A. Beck, hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and to the best of my knowledge comply with all applicable federal, state, and local statutes, regulations, and ordinances.

[Signature]
Gregory A. Beck, C.E.M.
Certified Environmental Manager
No. 1874
Expires: May 27, 2006

Date: 6-27-05
We appreciate the opportunity to be of service. If you have any questions or comments regarding this report, please contact the undersigned.

Respectfully submitted,
NINYO & MOORE

George C. Morris  
Senior Staff Environmental Scientist  
GCM/GB/I/Itk  
Distribution: (2) Addressee  
Attachments: Figures 1 and 2  
Appendices A and B  

Gregory A. Beck, C.E.M.  
Senior Project Environmental Scientist
FIGURES
APPENDIX A

AST Destruction Certificate

Las Vegas Paving Soil Destruction Certificate
May 4, 2005

LVI Environmental of Nevada
Attn: Bob Springs
4795 Quality Court
Las Vegas, Nevada 89103

Re: Hydrocarbon Remediation
LVPC Job 963557
Silver Strike Motel

Dear Mr. Springs:

We are pleased to announce that your Hydrocarbon impacted soil which were delivered to our facility on April 21, 2005 has been thermally treated.

Upon receipt of payment for services as outlined below and on the enclosed invoice, we will forward third party laboratory certification and our Certificate of Destruction for these soils.

Thermal Treatment:

21.22 Tons @ $24.00 $509.28

Total Amount Due $509.28

Should you have any questions or concerns regarding this matter, please contact me at 251-5800.

Sincerely,

LAS VEGAS PAVING CORPORATION

David C. Breault
Operations Manager
Hydrocarbon Remediation

Innovators in Recycling Asphalt Pavements
LAS VEGAS PAVING
4420 S. DECATUR
LAS VEGAS, NV 89103
RECYCLE CENTER/HYDROCARBON PLT

CUSTOMER: 394,
LVI ENVIRONMENTAL OF NEVADA,
24795 QUALITY COURT,
LAS VEGAS, NV 89135

GROSS
LOAD
9.88
TONS

NET
TONS
5.10

WEIGHTMASTER

This customer requires a P.O. # on ticket.

TICKET #00178951
PURCHASE ORDER #965557
DATE 06/20/05
TIME 13:52:01

TODAY'S ENVIRONMENTAL
JOB # BES5557 TONOPAH,
CHRYSLER CONTAMINATED SOIL
HYDROCARBON PLANT

LOADS
TIME IN 13:52:01
WEIGHT 5.10

TOTAL
TIME OUT 13:52:01

RECEIVED BY

Operator: Amy
APPENDIX B

Laboratory Reports
CLIENT: Ninyo & Moore
6700 Paradise Road, Suite E
Las Vegas, NV 89119

ATTN: Andrew Stuart

PROJECT NAME: Silver Strike
PROJECT NUMBER: 301218004

VERITAS ORDER ID: V0504047
PAGES: 2

Presented herein are the analytical results for samples received from the above referenced project.

Samples submitted for this project were not sampled by Veritas Laboratories. Unless otherwise noted, samples were received by Veritas Laboratories under a chain of custody in good condition, properly preserved, and within hold time for the requested analyses on 04/20/05.

Should you have any questions or comments, please feel free to contact me at (702) 521-1462.

General Comments:
None

Some Sample and/or QA results have been flagged as follows:
None

Bruce G. Cunningham
Veritas Laboratories

04/24/05 Date
 CLIENT: Ninyo & Moore  
PROJECT NAME: Silver Strike  
PROJECT NUMBER: 301218004  
PAGE: 2 of 2

**TEST:** Total Extractable Petroleum Hydrocarbons Using GC/FID  
**METHOD:** TX TPH, 8015M (C₅-C₃₃)  
**MATRIX:** Soil

<table>
<thead>
<tr>
<th>Client Sample ID</th>
<th>Sample Date/Time</th>
<th>Veritas Sample ID</th>
<th>Result mg/Kg</th>
<th>Carbon Range</th>
<th>D F</th>
<th>% Surr. Rec.</th>
<th>Reporting Limit (PQL)</th>
<th>Date Extracted/ Analyzed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stockpile-01</td>
<td>04/20/05 1030</td>
<td>V0504047-01</td>
<td>ND 63 118</td>
<td>GRO DRO ORO Total</td>
<td>1 1 1 1</td>
<td>93¹ 93²</td>
<td>10 mg/Kg 20 mg/Kg</td>
<td>04/20/05 04/21/05</td>
</tr>
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<td>North at 3' Bgs-02</td>
<td>04/20/05 1125</td>
<td>V0504047-02</td>
<td>ND ND ND</td>
<td>GRO DRO ORO Total</td>
<td>1 1 1 1</td>
<td>85¹ 94²</td>
<td>10 mg/Kg 20 mg/Kg</td>
<td>04/20/05 04/21/05</td>
</tr>
<tr>
<td>SE Corner at 2' Bgs-03</td>
<td>04/20/05 1130</td>
<td>V0504047-03</td>
<td>ND 79 208 287</td>
<td>GRO DRO ORO Total</td>
<td>1 1 1 1</td>
<td>70¹ 86²</td>
<td>10 mg/Kg 20 mg/Kg</td>
<td>04/20/05 04/20/05</td>
</tr>
<tr>
<td>Method Blank</td>
<td>NA</td>
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<td>ND ND ND</td>
<td>GRO DRO ORO Total</td>
<td>1 1 1 1</td>
<td>92¹ 95²</td>
<td>10 mg/Kg 20 mg/Kg</td>
<td>04/20/05 04/20/05</td>
</tr>
</tbody>
</table>

Surrogates used are: ¹1-chlorooctane and ²1-chlorooctadecane.

ND - Not Detected at indicated Reporting Limit (PQL).

**Carbon Range**  
GRO-Gasoline Range Organics (C₅-C₁₂), DRO-Diesel Range Organics (C₁₂-C₂₈), ORO-Oil Range Organics (C₂₉-C₃₃), Total, C₅-C₃₅
<table>
<thead>
<tr>
<th>Client Sample Identification</th>
<th>Lab ID #</th>
<th>Sampled Date</th>
<th>Sampled Time</th>
<th>Composite</th>
<th>Grab</th>
<th>Matrix Code*</th>
<th>**Preservation Codes</th>
<th>Received Temperature</th>
<th>Received in Good Condition?</th>
<th>Custody Seals?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stockpile 01</td>
<td>VS0504147-01</td>
<td>4-20-05</td>
<td>10:30</td>
<td>X</td>
<td>5</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td>Yes/No</td>
</tr>
<tr>
<td>North at 3' Bys - 02</td>
<td>VS0504147-02</td>
<td>4-20-05</td>
<td>11:25</td>
<td>X</td>
<td>5</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td>Yes/No</td>
</tr>
<tr>
<td>SE Career at 2' Bys - 03</td>
<td>VS0504147-03</td>
<td>4-20-05</td>
<td>11:30</td>
<td>X</td>
<td>5</td>
<td>X</td>
<td></td>
<td></td>
<td></td>
<td>Yes/No</td>
</tr>
</tbody>
</table>

*Matrix Code:
- GW = Groundwater
- WW = Wastewater
- DW = Drinking Water
- A = Air
- S = Soil/Solid
- SL = Sludge
- OL = Organic Liquid
- W = Wipe
- O = Other

**Preservation Codes:
- I = Iced
- H = HCL
- N = HNO3
- S = H2SO4
- X = NaOH
- T = Na2SiO3
- O = Other

Reclaimed by: (Signature) [Signature]
Date/Time: 4/20/05 12:00

Received by: (Signature) [Signature]
Date/Time: 4/20/05 12:00

Reclaimed by: (Signature) [Signature]
Date/Time: 4/20/05 12:00

Received by: (Signature) [Signature]
Date/Time: 4/20/05 12:00

Turnaround Time:
- 24 Hours
- 48 Hours
- 72 Hours

Normal

Other

Date Needed: 4/20/05 12:00

Page 1 of 1
CLIENT: Ninyo & Moore  
6700 Paradise Road, Suite E  
Las Vegas, NV 89119  
ATTN: Andrew Stuart

PROJECT NAME: Silver Strike  
PROJECT NUMBER: 301218004  
VERITAS ORDER ID: V0504050  
PAGES: 2

Presented herein are the analytical results for samples received from the above referenced project.

Samples submitted for this project were not sampled by Veritas Laboratories. Unless otherwise noted, samples were received by Veritas Laboratories under a chain of custody in good condition, properly preserved, and within hold time for the requested analyses on 04/21/05.

Should you have any questions or comments, please feel free to contact me at (702) 521-1462.

General Comments:
None
Some Sample and/or QA results have been flagged as follows:
None

Bruce G. Cunningham  
Veritas Laboratories

04/25/05
**Veritas Laboratories**

**CLIENT:** Ninyo & Moore  
**PROJECT NAME:** Silver Strike  
**PROJECT NUMBER:** 301218004  
**PAGE:** 2 of 2

**TEST:** Total Extractable Petroleum Hydrocarbons Using GC/FID  
**METHOD:** TX TPH, 8015M (C₅-C₃₃)  
**MATRIX:** Soil

<table>
<thead>
<tr>
<th>Client Sample ID</th>
<th>Sample Date/Time</th>
<th>Veritas Sample ID</th>
<th>Result mg/Kg</th>
<th>Carbon Range</th>
<th>D F</th>
<th>% Surr. Rec.</th>
<th>Reporting Limit (PQL)</th>
<th>Date Extracted/Analyzed</th>
</tr>
</thead>
<tbody>
<tr>
<td>SE Corner at 5°44'</td>
<td>04/21/05 1400</td>
<td>V0504050-01</td>
<td>ND</td>
<td>GRO</td>
<td>1</td>
<td>81&lt;sup&gt;1&lt;/sup&gt;</td>
<td>10 mg/Kg</td>
<td>04/21/05</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>ND</td>
<td>DRO</td>
<td>1</td>
<td>84&lt;sup&gt;2&lt;/sup&gt;</td>
<td>20 mg/Kg</td>
<td>04/21/05</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>ND</td>
<td>ORO</td>
<td>1</td>
<td></td>
<td>20 mg/Kg</td>
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<tr>
<td></td>
<td></td>
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<td>ND</td>
<td>Total</td>
<td>1</td>
<td></td>
<td>50 mg/Kg</td>
<td></td>
</tr>
<tr>
<td>Method Blank</td>
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<td>EBLK050421</td>
<td>ND</td>
<td>GRO</td>
<td>1</td>
<td>96&lt;sup&gt;1&lt;/sup&gt;</td>
<td>10 mg/Kg</td>
<td>04/21/05</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>ND</td>
<td>DRO</td>
<td>1</td>
<td>99&lt;sup&gt;2&lt;/sup&gt;</td>
<td>20 mg/Kg</td>
<td>04/21/05</td>
</tr>
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<td>ORO</td>
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<td></td>
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<td></td>
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<td></td>
<td></td>
<td></td>
<td>ND</td>
<td>Total</td>
<td>1</td>
<td></td>
<td>50 mg/Kg</td>
<td></td>
</tr>
</tbody>
</table>

Surrogates used are: <sup>1</sup>1-chlorooctane and <sup>2</sup>1-chlorooctadecane.

**ND** - Not Detected at indicated Reporting Limit (PQL).

**Carbon Range:**  
GRO-Gasoline Range Organics (C₅-C₁₂), DRO-Diesel Range Organics (C₁₂-C₂₈), ORO-Oil Range Organics (C₂₉-C₃₃).  
Total, C₅-C₃₅
<table>
<thead>
<tr>
<th>Client Sample Identification</th>
<th>Lab ID #</th>
<th>Sampled Date</th>
<th>Sampled Time</th>
<th>Composite</th>
<th>Grab</th>
<th>TPR Extractable</th>
</tr>
</thead>
<tbody>
<tr>
<td>SE. Corner &amp; S-DY</td>
<td>V0504050-01</td>
<td>4-21-05</td>
<td>1400</td>
<td>X</td>
<td>S</td>
<td></td>
</tr>
</tbody>
</table>

**Matrix Code**
- GW = Groundwater
- WW = Wastewater
- DW = Drinking Water
- A = Air
- S = Soil/Solid
- SL = Sludge
- OL = Organic Liquid
- W = Wipe
- O = Other

**Preservation Codes**
- 1 = Iced
- H = HCL
- N = HNO3
- S = H2SO4
- X = NaOH
- T = Na2S2O3
- O = Other

Received
- Temperature: 4.1°C
- Condition: Yes

HAIN OF CUSTODY
- Date/Time: 4-21-05
- Date Needed: 4-21-05