

STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor Leo M. Drozdoff, P.E., Director

Colleen Cripps, Ph.D., Administrator

April 4, 2013

Jay A. Steinberg Nevada Environmental Response Trust 35 East Wacker Drive, Suite 1550 Chicago, IL 60601

Re: Tronox LLC (TRX) Facility

Nevada Environmental Response Trust (Trust) Property

NDEP Facility ID #H-000539

Nevada Division of Environmental Protection (NDEP) Response to:

Hydrogeologic Flow Model, Supporting Documentation, and Response to Comments on the Model for the Nevada Environmental Response Trust Site, Henderson, Nevada

Dated: April 25, 2012 and undeted on the February 21, 2013

Dated: April 25, 2012 and updated on the February 21, 2013

Dear Mr. Steinberg,

The NDEP has received and reviewed the Trust's above-identified Deliverable and finds that the model is acceptable for the capture zone evaluation with the following comments noted for the Administrative Record:

- 1. The model is a groundwater flow model and not transport model;
- 2. The model can be applied only to the system with similar hydrogeological and hydraulic conditions that was used to develop the model;
- 3. The NERT Site groundwater model was originally developed using a pre-release version of MODFLOW-NWT that is not publically available. The MODFLOW-NWT is now publically available at the USGS website. The application of this model for future Deliverables should use the publically available MODFLOW-NWT;
- 4. The model used heads of 5,000 feet and 50 feet for the general head boundary with no explanation on how these two heads are derived. The model boundaries in future Deliverables should be defined based on available data.

Please contact the undersigned with any questions at wdong@ndep.nv.gov or 702-486-2850 x252.



Sincerely,

Weiquan Dong, P.E.

Special Projects Branch

Bureau of Corrective Actions

NDEP-Las Vegas City Office

WD:sh

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