



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 29, 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: *Semi Annual Remedial Performance Report for Chromium and Perchlorate July 2012 to December 2012; Nevada Environmental Response Trust Site, Henderson, Nevada*
Dated: March 1, 2013

Dear Mr. Steinberg,

The NDEP has received and reviewed the Trust's above-identified Deliverable and provides additional comments in Attachment A. These additional comments are supplemental to the comments that we sent out on the April 3, 2013 and they should be addressed in all future Semi-Annual Performance Reports. The Trust should provide an annotated response-to-comments letter as part of the next performance reporting Deliverable.

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:jd

EC: Greg Lovato, Bureau of Corrective Actions, NDEP
Shannon Harbour, NDEP
James Dotchin, NDEP
Adam Baas, Edgcomb Law Group
Allan Delorme, ENVIRON
Andrew Barnes, Geosyntec



Andrew Steinberg, Nevada Environmental Response Trust
Ashley Katri, McGinley & Associates
Betty Kuo, MWDH2O
Brenda Pohlmann, City of Henderson
Brian Rakvica, McGinley & Associates
Brian Spiller, Stauffer Management Company, LLC
Brian Waggle, Hargis + Associates
Carolyn Tanner, AG's Office
Cassandra Joseph, AG's Office
Catherine Sties, MWDH2O
Charles K. Hauser, Esq., Southern Nevada Water Authority
Chuck Elmendorf, Stauffer Management Company, LLC
David Hadzinsky, TIMET-HSEA Dept.
Ebrahim Juma , Clean Water Team
Ed Modiano, de maximis, inc.
Eric Fordham, Geopentech
George Crouse, Syngenta Crop Protection, Inc.
Jay Gear, Olin Co
Jeff Gibson, AMPAC
Jesus Gastelum Perez, Central Arizona Project
Jill Teraoka, MWDH2O
Joanne Otani
Joe Kelly, Montrose Chemical Corporation of CA
Joe Leedy, Clean Water Team
John Pekala, Environcorp
John R. McNeill, Central Arizona Water Conservation District
Kirk Stowers, Broadbent & Associates
Kurt Fehling, The Fehling Group
Kyle Gadley, Geosyntec
Lee Farris, BRC
Marcia Scully, Metropolitan Water District of Southern California
Mark Paris, Landwell
Mark Travers, ENVIRON
Michael Long, Hargis + Associates
Mickey Chaudhuri, Metropolitan Water District of Southern California
Mike Balshi, Neptune and Company, Inc.
Nicholas Pogoncheff, PES Environmental, Inc.
Paul Black, Neptune and Company, Inc.
Paul Hackenberry, Hackenberry Associates, LLC
Peggy Roefer, Southern Nevada Water Authority
Ranjit Sahu, BRC
Rebecca Shircliff, Neptune and Company, Inc.
Rex Heppe, Ninyo and Moore
Rick Kellogg, BRC
Ron Zegers, Southern Nevada Water Authority
Scott Bryan, Central Arizona Project
Stephen Tyahla, U.S. Environmental Protection Agency, Region 9
Tanya O'Neill, Foley & Lardner LLP
Teri Copeland
Victoria Tyson, TIMET

Attachment A

1. General comment, the Trust should start to increase the mass removal of the current system by focusing on pumping the wells installed in the Inceptor Well Field and the Athens Road Well Field. The focus on these wells is based on maximizing both the perchlorate removal from the two well fields and the system hydraulic and mass loading capacity.
2. NDEP requests that the NERT immediately implement Appendix F of the RI/FS Work Plan and to develop metrics for following four performance criteria:
 - a. The concentrations at which NERT is achieving 90% and 99% capture of perchlorate and chromium;
 - b. Pounds per day mass removal;
 - c. Mass discharge at the Athens Road Well Field;
 - d. Mass loading at Northshore Road.
3. The NERT should provide quantitative performance on these criteria in next semi-annual report.
4. The NERT should provide a complete assessment on the limitations of fully optimizing current the groundwater extraction and treatment system. This assessment should include the well production rates at each well field, the land availability, the pump capacity of each well field, the capacity of the pipe lines for influent and effluent, the discharge permit, GW-11 capacity, the chromium treatment system capacity and the FBR system capacity.