



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

11/18/2013

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: *NERT Response to NDEP June 27, 2013 Comments on the Remedial Investigation and Feasibility Study Work Plan; Nevada Environmental Response Trust Site, Henderson, Nevada; December 17, 2012 (NDEP Facility ID #H-000539)*

Dated: October 4, 2013

Dear Mr. Steinberg,

The NDEP has received and reviewed the Trust's above-identified Deliverable and provides comments in Attachment A. A revised Deliverable should be submitted **with the revised Remedial Investigation and Feasibility Study Work Plan** based on the comments found in Attachment A. The Trust should additionally provide an annotated response-to-comments letter as part of the revised 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
James Dotchin, NDEP, BCA LV
Adam Baas, Edgcomb Law Group
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David Johnson, Central Arizona Water Conservation District
Ebrahim Juma , Clean Water Team
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Ron Zegers, Southern Nevada Water Authority
Scott Bryan, Central Arizona Project
Stephen Tyahla, U.S. Environmental Protection Agency, Region 9
Susan Crowley, Crowley Envirn.
Tanya O'Neill, Foley & Lardner LLP
Teri Copeland
Wayne Klomp, AG's Office

Attachment A

1. Item #19d the Hydraulic and Mass Loading Capacity of the FBR. The contaminant mass loading of FBR was 1,893 equivalent pounds per day in original design drawing (PFD-1, Shaw Environmental, Inc., 2005) and should be 1,900 equivalent pounds per day if the number is rounded.
2. Item #28 AP-5 Pond Solids Characterization and Disposal. The discussion on the AP-5 solids is pending for more information.
3. Item 54c Downgradient Plume - Lateral Extent. More information and data is needed to define the separation between the Trust plume and the AMPAC plume to the west. The Trust may re-write "Based on the existing data, a 1mg/L perchlorate concentration appears to provide a basis for separation between the Trust Plume and the AMPAC plume to the west" as "Based on the existing data, a 1mg/L perchlorate concentration is assumed for separation between the Trust Plume and the AMPAC plume to the west" or other way to reflect similar meaning.
4. Items # 105 and 106. The GWETS is an active groundwater pump and treat (P&T) system, so transient groundwater hydraulic conditions have been dominant since 2001. Although the steady state groundwater hydraulic conditions may exist for a short period, the groundwater elevation for all three well fields generally has a downward trend from initiation of pumping in 2001, especially after the recharge trench was shut down in September 2010. The soil excavations and recent high precipitation have interrupted the trend, but overall the groundwater elevation of all three well fields show about 5 to 15 feet decrease from the initial pumping in 2001 with relatively large decrease at the east side. Therefore, a transient groundwater hydraulic condition is more representative for the GWETS. The NDEP suggest that the NERT develop a transient groundwater flow model for the GWETS based on the 2010 steady state model or the steady state model for the 2013 GWETS Optimization. The transient groundwater flow model should be an important tool to manage and optimize groundwater pump and treat for the GWETS. Furthermore the transient groundwater flow model will provide a basis to predict the groundwater remediation for the GWETS.