



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

Brian Sandoval, Governor
Leo M. Drozdoff, P.E., Director
David Emme, Administrator

June 1, 2016

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*

Dated: April 29, 2016

Dear Mr. Steinberg,

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

1. Field Data Sheets don't have ORP data that is required field parameter in Appendix B of Field Sampling Plan Reversion1 (Environ, 2014). Please provide ORP in the field data sheets of future semi-annual and annual performance reports.
2. Equipment calibration in Field Data Sheets doesn't provide equipment model and serial numbers that are also required in Appendix B of Field Sampling Plan Reversion1 (Environ, 2014). Please provide correct equipment calibration in the field data sheets of future semi-annual and annual performance reports, and sent by e-mail any Calibration Log Sheet for this past event.
3. Tables 9 and 10 of perchlorate and chromium plume mass estimates for 2002, 2006 and 2012 are not updated with new aquifer information obtained in NERT Phase I Remediation Investigation and COP subsurface hydrogeological evaluations. NDEP understands that it is difficult to apply new information of perchlorate and chromium concentration back to the mass estimates for 2002, 2006 and 2012 but it is possible to apply contaminated aquifer information back and to re-calculate the perchlorate and chromium mass for the year of 2002, 2006 and 2012.
4. Tables 9, 10 and 15. NDEP suggests adding a new table to expand to include perchlorate and chromium mass remaining in groundwater and including saturated thickness and porosity of aquifers used to calculate the mass, plume area, contaminated groundwater volume, perchlorate or chromium mass by each contour interval corresponding it on the plume maps showing in the annual performance report (e.g., Plates 6 and 7), by water-bearing zone (e.g., shallow and middle), and by location (e.g., On-site, Off-site to AWF,

and AWF to the Wash). Please calculate the center of mass for perchlorate and chromium for inclusion in Table 15 or new table.

- NDEP suggests adding a table showing GWETS operation metrics for the period reported following table format:

GWETS Operational Unit	Influent Concentration				Effluent Concentration				Mass Destroyed or Treated (tons) ¹		
	Flow (gpm)	Perchlorate (mg/l)	Hexavalent Chromium (µg/l)	Total Chromium (mg/l)	Flow (gpm)	Perchlorate (mg/l)	Hexavalent Chromium (µg/l)	Total Chromium (mg/l)	Perchlorate	Hexavalent Chromium	Total Chromium
GWTP											
GW-11											
FBRs											

1. This item for GW-11 is the mass change.

- NDEP noticed on Well L-C that the water level elevations are below screen. Please check it and correct it in future submission.
- NDEP noticed on Well ART-1 that there was no pumping, yet mass of perchlorate and chromium are being removed. Please verify and correct it in future submission.

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

Sincerely,



Weiquan Dong, P.E.
Bureau of Industrial Site Cleanup
NDEP-Las Vegas City Office

WD:jp

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