



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 24, 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: *2016 Groundwater  
Monitoring Optimization Plan*

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. Discontinue sterile filtering of perchlorate (6.2.3), while NDEP agrees with this as a generality, permit driven sampling have precedence on procedures and will require sterile filtering of perchlorate.
2. Although not specifically mentioned, NDEP is open to adding more pressure transducers. The change of groundwater table elevation is a key parameter to understand groundwater flow and contaminant concentration. Most groundwater table elevations are based on manual measurements that are difficult to reflect seasonal variation. NDEP suggests that NERT collect some transects of monitoring wells by installing pressure transducers. NDEP would recommend starting near Unit buildings with transducers to wells near seep well field.

Please contact the undersigned with any questions at [wdong@ndep.nv.gov](mailto: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:cp

EC:

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Carlton Parker, NDEP BISC Las Vegas  
My-Linh Nguyen, NDEP SDW Carson City  
Adam Baas, Edgcomb Law Group  
Allan Delorme, Ramboll Environ  
Alison Fong, U.S. Environmental Protection Agency, Region 9  
Andrew Barnes, Geosyntec  
Andrew Steinberg, Nevada Environmental Response Trust  
Anna Springsteen, Neptune & Company Inc.  
Betty Kuo Brinton, MWDH2O  
Brenda Pohlmann, City of Henderson  
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Chuck Elmendorf, Stauffer Management Company, LLC  
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David Johnson, Central Arizona Water Conservation District  
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