

Department of Conservation & Natural Resources

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

August 19, 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: Response to Comments – Seep Well Field Area Bioremediation Treatability Study Work Plan Nevada Environmental Response Trust Henderson, Nevada

Dated: August 3, 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. Page 8, Section 3.1.3, states "The TDEM method has been used to successfully identify paleochannels in the UMCf at the Black Mountain Industrial Complex (Formerly TIMET) property southeast of the study area (GEOVision,2003)." It should be noted that the Black Mountain Industrial Complex was not formerly named TIMET. Additionally, it should also be noted that the GEOVision report in 2003 was conducted by Basic Remediation Company for the Upper and Lower Ponds and Ditches. It did depict a potential paleochannel emanating at the TIMET site yet this finding not corroborated by TIMET investigators at the time.
- 2. Page 20 Section 6.0 states, "Monthly status updates will be provided to the Trust summarizing the progress and results of the preliminary field activities, laboratory, and field testing, as needed. Following completion of the field test, a Seep Well Field Area Bioremediation Treatability Study Report will be prepared for NDEP and US EPA review." The Work Plan should include NDEP in the monthly reports.

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:cp

EC:

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Carlton Parker, NDEP BISC Las Vegas

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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.

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Dave Johnson, LVVWD

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Eric Fordham, Geopentech

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