



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

**STATE OF NEVADA**  
Department of Conservation & Natural Resources

Brian Sandoval, Governor  
Bradley Crowell, Director  
Greg Lovato, Administrator

June 9, 2017

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: *Phase 2 Remedial Investigation Modification No. 3, Nevada Environmental Response Trust, Henderson, Nevada*

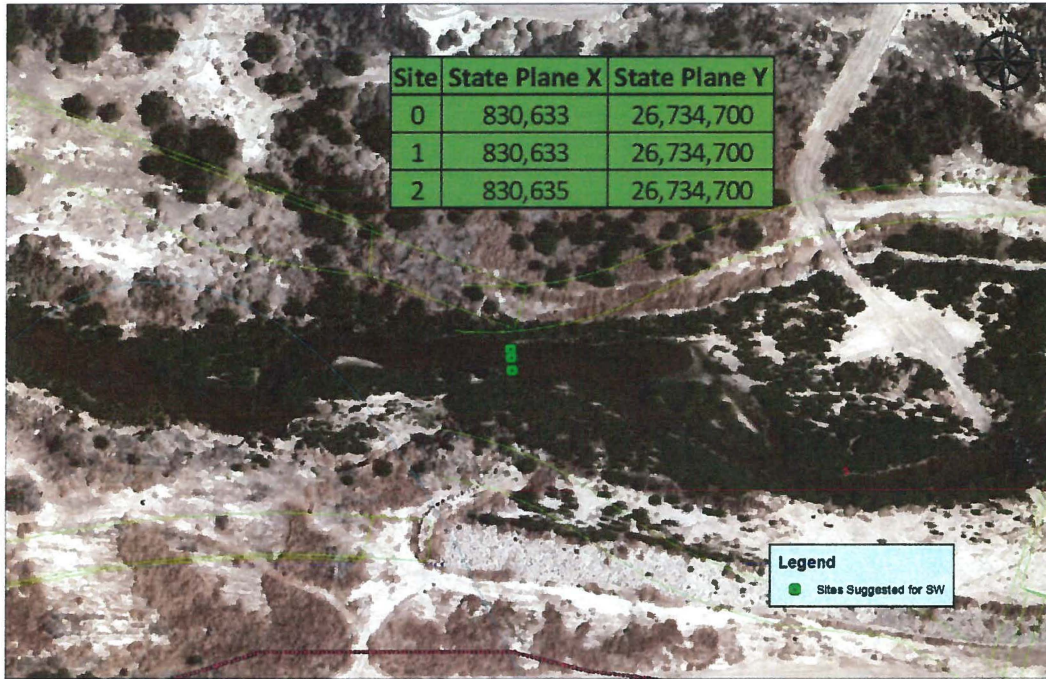
Dated: June 7, 2017

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. NDEP suggests replacing proposed Las Vegas Wasteway (LW8.85) with Duck Creek Conference (LW7.2) because the flow at Duck Creek Conference is combination of both the upper Las Vegas Wash and Duck Creek. Additionally this location is just beyond the western margin of the perchlorate plume associated with the Black Mountain Industry area;
2. Monthly sampling is unnecessary at the proposed transects after the distribution characteristic of perchlorate along proposed transects is defined, so NDEP suggests a monthly grab sample at a single fixed site of the proposed location to be taken for perchlorate analysis after an initial 3-6 sampling events and not full transect sampling.
3. NDEP suggests adding an additional sampling transect located between Upper Narrow Weir and the proposed Sunrise Mountain Weir (See inserted figure below) to better define starting edge of perchlorate loading into Las Vegas Wash. These suggested locations don't need to be an exact match with the coordinates shown here. The considerations here are (1) the surface water sampling results obtained by AECOM, (2) the potential discharge locations of the perchlorate-impacted groundwater from NERT and Endeavour's perchlorate plume areas, and (3) the influence due to the construction of Sunrise Mountain

Weir and the pool water level after the construction.



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:

- James Dotchin, NDEP BISC Las Vegas
- Carlton Parker, NDEP BISC Las Vegas
- 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
- Brian Waggle, Hargis + Associates
- Carol Nagai, MWDH2O
- Chris Ritchie, Ramboll Environ
- Chuck Elmendorf, Stauffer Management Company, LLC
- Dave Share, Olin
- David Johnson, Central Arizona Water Conservation District

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