



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

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

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

November 16, 2018

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: *RI Phase 3*  
*Modification No. 5 -- Seep Well Field Area Drilling*

Dated: November 14, 2018

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. The perchlorate concentrations of soil and groundwater from Galleria Bioremediation Treatability study site do not agree each other. For example, the perchlorate concentration of the soils from depth intervals of 100 to 120 ft. is less than 0.08 mg/kg but the perchlorate concentration of groundwater at this depth ranges from 50 to 3,200 µg/l, so the perchlorate of soils that is only analyzed in this modification may not indicate the perchlorate of groundwater. NDEP suggests that NERT take groundwater samples for perchlorate analysis for proposed soil borings if groundwater is found in the proposed drilling depth of UMCf.

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  
Chinny Esakkiperumal, Olin Corporation  
Chris Ritchie, Ramboll Environ  
Chuck Elmendorf, Stauffer Management Company, LLC  
Dan Pastor, P.E. TetraTech  
Dave Share, Olin  
Dave Johnson, LVVWD  
David Parker, Central Arizona Water Conservation District  
Derek Amidon, Tetrattech  
Ebrahim Juma, Clean Water Team  
Ed Modiano, de maximis, inc.  
Eric Fordham, Geopentech  
Frederick Perdomo, AG Office  
Gary Carter, Endeavour  
George Crouse, Syngenta Crop Protection, Inc.  
Harry Van Den Berg, AECOM  
Jay Steinberg, Nevada Environmental Response Trust  
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Jill Teraoka, MWDH2O  
Joanne Otani  
Joe Kelly, Montrose Chemical Corporation of CA  
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Kelly McIntosh, GEI Consultants  
Kevin Fisher, LV Valley Water District  
Kirk Stowers, Broadbent & Associates  
Kirsten Lockhart, Neptune & Company Inc.  
Kim Kuwabara, Ramboll Environ  
Kurt Fehling, The Fehling Group  
Kyle Gadley, Geosyntec  
Kyle Hansen, Tetrattech  
Lee Farris, BRC  
Marcia Scully, Metropolitan Water District of Southern California  
Maria Lopez, Water District of Southern California  
Mark Duffy, U.S. Environmental Protection Agency, Region 9  
Mark Paris, Landwell  
Michael J. Bogle, Womble Carlyle Sandridge & Rice, LLP  
Michael Long, Hargis +  
Mickey Chaudhuri, Metropolitan Water District of Southern California  
Nicholas Pogoncheff, PES Environmental, Inc.  
Orestes Morfin, CAP  
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