



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

Steve Sisolak, Governor
Bradley Crowell, Director
Greg Lovato, Administrator

September 30, 2019

Jay A. Steinberg
Nevada Environmental Response Trust
35 East Wacker Drive, Suite 690
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: *Seep Well Field*
Area Bioremediation Treatability Study Results Report

Dated: August 13, 2019

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. Section 5.3.1 Determination of Injectate Requirements. "Stoichiometric requirements for the carbon substrate based on the mass of perchlorate and other electron acceptors that would migrate through the treatability study area", but both Calculation of the Target Treated Soil Mass and Estimation of the Substrate Requirement equations don't have any component related to the stoichiometric requirements. NDEP asks a clarification whether the oil retention ratio or the stoichiometric requirements or both are considered to determine the injectate requirements.
2. Each image represents the interpolated perchlorate concentration plume in the alluvium where concentrations exceed 5,000 µg/L 3D visualization of perchlorate of in Figures 8d and 8d. NDEP suggests that the 3D interpolation include all perchlorate concentration ranges that were showed in Figures 8a to 8c.

These comments can be addressed in an addendum to this report or in the future report for the Treatability/Pilot Study Modification No.6.

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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Frederick Perdomo, Deputy Administrator NDEP
James Dotchin, NDEP BISC Las Vegas
Carlton Parker, NDEP BISC Las Vegas
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Andrew Barnes, Geosyntec
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