



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

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

October 24, 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: *Barrier Wall
Integrity Evaluation Report*

Dated: August 29, 2019

Dear Mr. Steinberg,

The NDEP has received and reviewed the Trust's above-identified Deliverable and provides comments in Attachment A. A revised Deliverable should be submitted **by 12/24/2019** based on the comments found in Attachment A. The Trust should additionally provide an annotated response-to-comments letter as part of the revised Deliverable.

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:

Jeffrey Kinder, Deputy Administrator NDEP
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James Dotchin, 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.
Betty Kuo Brinton, MWDH2O

Brenda Pohlmann, City of Henderson
Brian Loffman, Iepetomane
Brian Waggle, Hargis + Associates
Carol Nagai, MWDH2O
Carrie Hunt, 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
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George Crouse, Syngenta Crop Protection, Inc.
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Marcia Scully, Metropolitan Water District of Southern California
Maria Lopez, Water District of Southern California
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Mark Paris, Landwell
Michael J. Bogle, Womble Carlyle Sandridge & Rice, LLP
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Mickey Chaudhuri, Metropolitan Water District of Southern California
Nicholas Pogoncheff, PES Environmental, Inc.
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Attachment A

1. **General Comment:** The comments below are mostly editing errors. NDEP suggests NERT eliminate or reduce the editing errors in its all future deliverables.
2. **Section 3.3. Summary of Willowstick Results, first paragraph** – “The survey was able to provide reliable results over the entire length of the wall except in the western-most third of Survey Area 1, near the Building D1 where subsurface and overhead utilities interfered with the signal and measurements.” “Area 1” should be “Area 3”.
3. **Section 7.1 Methodology, first paragraph** – “The East Injection Well dye tracer well network consisted of injection well BWTR-1, and monitoring wells BWTR-2, BWTR-3 and M-74 (Figure 13). The West Injection Well dye tracer well network consisted of injection well BWTR-4, monitoring wells BWTR-5, BWTR-6, and M-140 (Figure 14).” These well IDs don’t correctly correspond them on Figures 13 and 14. Please correct them.
4. **Figures 12 and 13** – The final paragraph in Section 7.4 Tracer Test Dye Introduction states that post-dye tracer introduction monitoring was conducted at well M-179. However, well M-179 is not shown in Figures 12 or 13 (M-179 is located approximately halfway between M-72 and M-73). Please correct it.
5. **Table 7** - The final paragraph in Section 7.4 Tracer Test Dye Introduction states that “post-dye tracer introduction monitoring was conducted...at monitoring wells M-179 and M-73, thereby providing a well network of four monitoring wells for each tracer test.” However, Table 7 does not show the results for wells M-179 and M-73. Please correct it.