



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources
Steve Sisolak, Governor
Bradley Crowell, Director
Greg Lovato, Administrator

April 9, 2020

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: *Annual Remedial
Performance Report for Chromium and Perchlorate*

Dated: December 31, 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. Figures 3a to 3c show that OU-2 and OU-3 don't have much upward vertical gradient, but Figure 6b shows significant perchlorate mass flux in both OU-2 and OU-3, which requires more clarifications in future annual remedial performance reports.
2. Figures 4b-4c show capture zones for Middle and Deep zones. The depth of all extraction wells of GWETS is in Shallow Zone. Please explain how the capture zones for Middle and Deep zones is simulated in future annual remedial performance reports.
3. Figure 6a shows that the perchlorate mass flux of 203 lb./day crossing the boundary of OU-1 to OU-2 was captured. There are no extraction wells and other capture infrastructures along this boundary, please explain how the 203 lb./day of perchlorate mass flux is captured in future annual remedial performance reports.
4. NDEP requires that the field sampling records follow Remedial Performance Groundwater Sampling and Analysis Plan-Revision 1 (Ramboll, 2020) in future annual remedial performance reports.

Please contact the undersigned with any questions at wdong@ndep.nv.gov or 702-486-2850 x252.

Sincerely,

Song Weiquan

WeiQuan Dong, P.E.
Bureau of Industrial Site Cleanup
NDEP-Las Vegas City Office

WD:cp

EC:

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