

OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE

Le Petomane XXVII, Inc., Not Individually, But Solely as the Nevada Environmental Response Trust Trustee
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September 13, 2016

Mr. Weiquan Dong, Ph.D.
Bureau of Industrial Site Cleanup
Nevada Division of Environmental Protection
2030 E. Flamingo Rd, Suite 230
Las Vegas NV 89119

RE: Seep Well Field Area Bioremediation Treatability Study Work Plan
Nevada Environmental Response Trust
Henderson, Nevada

Dear Mr. Dong:

The Nevada Environmental Response Trust (NERT) is pleased to present the attached final Seep Well Field Area Bioremediation Treatability Study Work Plan to the Nevada Division of Environmental Protection (NDEP). In addition, this letter responds to the two additional comments received regarding NERT's Response to Comments (RTC) submitted on August 3, 2016 and NDEP's response dated August 19, 2016. Each of NDEP's comments is repeated below in italics followed by NERT's response.

1. *Page 8, Section 3.1.3 states "The TDEM method has been used to successfully identify paleochannels in the UMCf of the Black Mountain Industrial Complex (Formerly TIMET) property southeast of the study area (GEOVision, 2003)." It should be noted that the Black Mountain Industrial Complex was not formerly named TIMET. Additionally, it should be noted that the GEOVision report in 2003 was conducted by Basic Remediation Company for the Upper and Lower Ponds and Ditches. It did depict a potential paleochannel emanating at the TIMET site yet this finding not corroborated by TIMET investigators at the time.*

Trust's Response:

Comment Noted. The text referencing Formerly TIMET has been removed from the sentence.

2. *Page 20 Section 6.0 states, "Monthly status updates will be provided to the Trust summarizing the progress and results of the preliminary field activities, laboratory, and field testing, as needed. Following completion of the field test, a Seep Well Field Area Bioremediation Treatability Study Report will be prepared for NDEP and US EPA review." The Work Plan should NDEP in the monthly reports.*

Trust Response:

The sentence stated in Section 6.0 has been updated to include NDEP as a recipient of the monthly status reports.

The RTC and revisions described herein, as well as those provided in the August 3, 2016 RTC letter have been incorporated into the attached Seep Well Field Area Bioremediation Treatability Study Work Plan. Please note: in the August RTC, NERT's response to NDEP comment #3 indicated that several monitoring wells including MW-K8 would be added to the planned treatability study monitoring program. Following submittal of the August

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RTC, the Trust became aware that MW-K8 has been plugged and abandoned. As a result, this well has been eliminated from the monitoring program and the work plan text has been updated accordingly.

NERT is in the process of preparing a budget for implementation of the work plan and will proceed with the treatability study effort upon NDEP approval of the forthcoming budget.

If you have any questions or concerns regarding this matter, feel to contact me at (702) 960-4309 or at steve.clough@nert-trust.com.

Office of the Nevada Environmental Response Trust



Stephen R. Clough, P.G., CEM
Remediation Director

CEM Certification Number: 2399, exp. 3/24/17

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