

OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE

Le Petomane XXVII, Inc., Not Individually, But Solely as the Nevada Environmental Response Trust Trustee
35 East Wacker Drive - Suite 690
Chicago, Illinois 60601
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April 17, 2020

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

RE: Ex-Situ Zero Valent Iron Technology Evaluation
Nevada Environmental Response Trust
Henderson, Nevada

Dear Dr. Dong:

The Nevada Environmental Response Trust (NERT) is pleased to present the Ex-Situ Zero Valent Iron Technology Evaluation for Nevada Division of Environmental Protection (NDEP) review. Consistent with NERT's 2019 Milestones as approved by NDEP and the U.S. Environmental Protection Agency, the purpose of this evaluation was to further review University of Nevada Las Vegas laboratory data as derived through the bench scale efforts associated with the NERT Unit 4 In-Situ Bioremediation Treatability Study, together with data derived through ongoing operations of the existing NERT Groundwater Extraction and Treatment System, to determine if additional studies at the laboratory or pilot scale level could be warranted. Specifically, could the utilization of Zero Valent Iron technology in an ex-situ application perform comparably or more favorable to other technologies currently utilized and/or being studied by NERT such that additional data would be required to fully evaluate the technology in the NERT Feasibility Study (FS).

In summary, it is the current opinion of NERT that utilization of Zero Valent Iron in an ex-situ application does not warrant additional evaluation at the laboratory or pilot scale. FS level cost and performance calculations will be achievable based upon readily available data should the technology be selected for detailed evaluation. Please note that a comprehensive evaluation of chemical/biological treatment capacity of the current chromium or biological treatment plants was not conducted by Arcadis. However, this issue will be thoroughly evaluated during the FS as part of assembling remedial action technologies.

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. 3/24/21

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April 17, 2020

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Ex-situ Zero Valent Iron (ZVI) Technology Evaluation

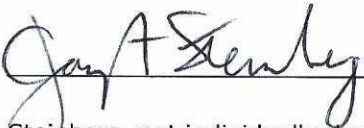
**Nevada Environmental Response Trust Site
(Former Tronox LLC Site)
Henderson, Nevada**

Nevada Environmental Response Trust (NERT) Representative Certification

I certify that this document and all attachments submitted to the Division were prepared at the request of, or under the direction or supervision of NERT. Based on my own involvement and/or my inquiry of the person or persons who manage the system(s) or those directly responsible for gathering the information or preparing the document, or the immediate supervisor of such person(s), the information submitted and provided herein is, to the best of my knowledge and belief, true, accurate, and complete in all material respects.

Office of the Nevada Environmental Response Trust

Le Petomane XXVII, Inc., not individually, but solely in its representative capacity as the Nevada Environmental Response Trust Trustee

Signature:  **Not Individually, but Solely
as President of the Trustee**

Name: Jay A. Steinberg, not individually, but solely in his representative capacity as President of the Nevada Environmental Response Trust Trustee

Title: Solely as President and not individually

Company: Le Petomane XXVII, Inc., not individually, but solely in its representative capacity as the Nevada Environmental Response Trust Trustee

Date: 4/16/2020