



STATE OF NEVADA
Department of Conservation & Natural Resources
DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor
Leo M. Drozdoff, P.E., Director
Colleen Cripps, Ph.D., Administrator

August 1, 2012

Jay A. Steinberg
Nevada Environmental Response Trust
35 East Wacker Drive, Suite 1550
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:
Hydrogeologic Flow Model, Supporting Documentation, and Response to Comments on the Model for the Nevada Environmental Response Trust Site, Henderson, Nevada
Dated: April 25, 2012

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 based on the comments found in Attachment A. Please advise the NDEP **by July 16, 2012** regarding the schedule for this resubmittal. 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 sharbour@ndep.nv.gov or 775-687-9332.

Sincerely,

Shannon Harbour, P.E.
Supervisor, Special Projects Branch
Bureau of Corrective Actions
NDEP-Carson City Office

SH:sh

EC: Greg Lovato, Bureau of Corrective Actions, NDEP
Carolyn Tanner, AG's Office
Cassandra Joseph, AG's Office
Brenda Pohlmann, City of Henderson
Stephen Tyahla, U.S. Environmental Protection Agency, Region 9
Charles K. Hauser, Esq., Southern Nevada Water Authority
Ron Zegers, Southern Nevada Water Authority
Peggy Roefer, Southern Nevada Water Authority



Marcia Scully, Metropolitan Water District of Southern California
Mickey Chaudhuri, Metropolitan Water District of Southern California
John R. McNeill, Central Arizona Water Conservation District
Andrew Steinberg, Nevada Environmental Response Trust
Tanya O'Neill, Foley & Lardner LLP
Allan Delorme, ENVIRON
Mark Travers, ENVIRON
Matt Paque, Tronox
Ranajit Sahu, BRC
Rick Kellogg, BRC
Lee Farris, BRC
Mark Paris, Landwell
Craig Wilkinson, TIMET
Kirk Stowers, Broadbent & Associates
Victoria Tyson, Tyson Contracting
Brian Spiller, Stauffer Management Company, LLC
Chuck Elmendorf, Stauffer Management Company, LLC
Adam Baas, Edgcomb Law Group
George Crouse, Syngenta Crop Protection, Inc.
Ed Modiano, de maximis, inc.
Lynne Preslo, GeoEco
Andrew Barnes, Geosyntec
Nicholas Pogoncheff, PES Environmental, Inc.
Brian Waggle, Hargis + Associates
Michael Long, Hargis + Associates
Joe Kelly, Montrose Chemical Corporation of CA
Jeff Gibson, AMPAC
Ebrahim Juma , Clean Water Team
Joe Leedy, Clean Water Team
Kathryn Hoffmann, Clean Water Team
Brian Rakvica, McGinley & Associates
Ashley Katri, McGinley & Associates
Kurt Fehling, McGinley & Associates
Paul Black, Neptune and Company, Inc.
Paul Hackenberry, Hackenberry Associates, LLC
Joanne Otani
Teri Copeland

Attachment A

1. Page 1, third paragraph, the memorandum states that "...only comments #15 and #16 [from the NDEP letter RE: *Capture Zone Evaluation* dated April 5, 2011] were identified as being directly related to the model development and inputs." NDEP disagrees with this appraisal; NDEP believes that comments #23 and 28 also relate to model development and inputs. Please include responses to these comments in the revision of this memorandum.
2. Page 2, fourth paragraph, NDEP notes that auto-calibration of hydraulic conductivity of the Qal (Model Report Table E-8) resulted as the highest value of the employed calibration range, the arithmetic mean of all listed Qal conductivities (Model Report Table E-1). It appears that the calibration process could have arrived at a higher conductivity value had the range been extended beyond the arithmetic mean, which may have led to better model performance (e.g., calibration statistics). NDEP requests that the model calibration be re-run using some significantly higher upper bound for Qal hydraulic conductivity, in order to determine if calibration statistics may be improved.