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NEVADA DIVISION OF ENVIRONMENTAL PROTECTION
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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

October 31, 2013

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: *2013 GWETS Optimization Project Work Plan*

Dated: October 18, 2013

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 11/22/2013** 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,

Dong Wu

Weiquan Dong, P.E.
Special Projects Branch
Bureau of Corrective Actions
NDEP-Las Vegas City Office

WD:jd

EC: Greg Lovato, Bureau of Corrective Actions, NDEP
James Dotchin, NDEP, BCA LV
Adam Baas, Edgcomb Law Group
Allan Delorme, ENVIRON
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Andrew Steinberg, Nevada Environmental Response Trust
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Charles K. Hauser, Esq., Southern Nevada Water Authority
Chuck Elmendorf, Stauffer Management Company, LLC
David Johnson, Central Arizona Water Conservation District
Ebrahim Juma , Clean Water Team
Ed Modiano, de maximis, inc.
Eric Fordham, Geopentech
George Crouse, Syngenta Crop Protection, Inc.
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Rick Kellogg, BRC
Ron Zegers, Southern Nevada Water Authority
Scott Bryan, Central Arizona Project
Stephen Tyahla, U.S. Environmental Protection Agency, Region 9
Susan Crowley, Crowley Envirn.
Tanya O'Neill, Foley & Lardner LLP
Teri Copeland
Wayne Klomp, AG's Office

Attachment A

1. General comment, the updated model should consider the soil excavations and storm water detention basins within the model domain.
2. General comment, the boundary conditions of the most bottom layer in the 2010 steady state model should be re-defined based on the data.
3. General comment, the slurry wall should be implemented in the updated model.
4. General comment, the updated model should have a conceptual water budget. The components of the water budget should at least have the natural and artificial groundwater recharge, groundwater discharge including groundwater evapotranspiration, groundwater extractions, and boundary fluxes including flow into and out of the model boundaries.
5. Section 2.3.2 Status of FBR Refurbishment, second paragraph, page 6. "The maximum loading (nitrate, chlorate, and perchlorate) to the FBR process is 1,800 equivalent pounds per day". The accurate number should be 1,893 equivalent pounds per day (Original design drawing, 2005).
6. Section 4.4 Capture Zone Evaluation and Pumping Optimization, page 21. All analyses related to the metrics on capture zones should follow the six steps for systematic evaluation of capture zones (USEPA, 2008).
7. Section 5.2Anticipate Schedule, page 22. The NERT should make every effort to activate the 9 wells proposed in this work plan once the water level of the GW-11 meets the operation volume (34 million gallons).

References:

1. UU.S. EPA, 2008. A Systematic Approach for Evaluation of Capture Zones at Pump and Treat Systems, EPA/600/R-08/003.