



June 28, 2016

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: *Seep Well Field
Area Bioremediation Treatability Study Work Plan*
Dated: May 31, 2016

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. To the extent feasible, NERT should use 'lessons learned' from the on-going Athens Road bioremediation pilot study. Although the Athens Road pilot study report will not be finalized until late 2016, information about well placement, injection rates, EOS delivery concentration, effects of hydrant chase water, and other technical details gleaned from the on-going Athens Road pilot study should be incorporated into the Seep Well Field pilot study.
2. Single borehole dilution tests (Section 3.1.5) and slug tests (Section 3.1.6) provide localized information about subsurface hydraulic conditions immediately adjacent to the well. NERT should consider doing pump tests and/or wider scale tracer tests to better understand the hydrogeology within the Seep Well Field study area or, to the extent feasible, utilize existing pump test information from gathered in the SWF area from the COP.
3. Proposed monitoring wells in Figure 2 (Field Test Conceptual Layout) lack further downgradient sites and are narrow compared to the width of the injection wells. NDEP suggests that NERT adding additional monitoring wells in further and wider downgradient area of the injection wells. If the access is an issue for the downgradient area, NERT should consider utilizing existing wells and the surface water sampling site of LW5.5.
4. The injection events in Table 3 (Preliminary Project Schedule) should be scheduled based on the groundwater velocity at the field site because hydrogeology of the field site is likely different from the existing bioremediation study site that was near the AWF.

5. Please add Arsenic to the analytical parameters of Table 2 (Example Performance Monitoring Sampling Protocol).

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

Sincerely,



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

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