



October 27, 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: *Technical Memorandum Seep Well Field Flow Quantification, Nevada Environmental Response Trust Site, Henderson, Nevada*

Dated: September 9, 2016

Dear Mr. Steinberg,

The NDEP has received and reviewed the Trust's above-identified Deliverable and finds that the document is acceptable under existing information with the following comments noted for the Administrative Record:

1. The remediation investigation of Seep Well Field (SWF) is ongoing. Most existing wells at SWF are shallow and the contribution from the deep groundwater to the shallow groundwater can't be determined. It is noted that the chemistry of the shallow groundwater does indicate potential from deep groundwater contribution to the SWF. The conclusions on the source water of SWF from this deliverable are weak. NDEP will reserve its decision on the source water of SWF until the remediation is completed;
2. The mass balance of TDS was mainly used to calculate the source water contribution to SWF in this deliverable. NDEP suggests that a comprehensive geochemical modeling with a consideration of all meaningful conservative chemical species of SWF groundwater should be included in future analysis;
3. The hydraulic connection between the COH Bird Viewing Ponds and the SWF groundwater appears strong, but other hydraulic connections with precipitation recharge, irrigation infiltration, upward gradient to the shallow groundwater from and the deep groundwater should also be considered. If the information for other potential sources lacks, NERT should plan to collect it through the remediation investigation.

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

WD:cp

EC:

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