



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

**STATE OF NEVADA**  
Department of Conservation & Natural Resources  
Brian Sandoval, Governor  
Bradley Crowell, Director  
Greg Lovato, Administrator

May 17, 2017

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: *Semi-annual  
Remedial Performance Memorandum for Chromium and Perchlorate  
Nevada Environmental Response Trust Site, Henderson, Nevada*

Dated: April 28, 2017

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. Last paragraph, Page 15: "Therefore, based on the data reported by Endeavour, approximately 78-79% of the perchlorate loading to the Las Vegas Wash between Las Vegas Wasteway and Pabco Road occurs upstream of the NERT shallow groundwater plume." It is too early to count the non-captured perchlorate mass reported by Endeavour into the total perchlorate mass loading of surface water at Pabco Road because there is no clear evidence of the terminal discharge points for those non-captured perchlorate mass. The memorandum on shallow zone capture assessment-Revision 1 by Endeavour (March 28, 2017) indicates that some of the non-captured perchlorate moves towards NERT Seep Well Field (SWF). Furthermore, recent surface water sampling results from the NERT Downgradient Investigation don't show much perchlorate gain until the sampling transect of LW6.35 that is closer to the NERT SWF. Therefore, NDEP reserves its right on the proportional contribution of the total perchlorate mass loading at Pabco Road from different contributors until more clear evidence collected.

Please contact the undersigned with any questions at [wdong@ndep.nv.gov](mailto: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

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