



February 6, 2018

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: *Annual Remedial Performance Report for Chromium and Perchlorate*

Dated: December 8, 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. Table 10—Perchlorate Plume Mass Estimates show that the perchlorate mass of UMCf for the area from AWF to Wash is zero, but the site characterization for the SWF in-situ bioremediation treatability study shows that the perchlorate exists in deeper zones compared previous findings. Additionally, Figure 5 (Vertical Mass Flux Estimates) shows that the vertical perchlorate mass flux in this area is 28 lbs./d. Therefore, the information about the perchlorate mass distribution for the area from AWF to Wash is inconsistent. NDEP expects that these issues are addressed in next annual remedial performance report or the mass estimation report.
2. Figure 4 (Horizontal Mass Flux Estimates) shows that the perchlorate and chromium mass fluxes crossing different transects from onsite to wash. Because the groundwater flow direction is from south where the perchlorate and chromium sources are located to north where the contaminated groundwater is discharging and three well extraction well fields have been operated since early 2000, the perchlorate and chromium mass fluxes are expected to be decreasing toward the wash. However, the complexity of the groundwater flow and the perchlorate and chromium migration may not follow the expectation. NDEP expects these mass fluxes are refined in future annual remedial performance reports, the Mass Calculation Work Plan and Phase 6 or next groundwater flow and transport model.

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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