



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

**STATE OF NEVADA**  
Department of Conservation & Natural Resources

Brian Sandoval, Governor  
Bradley Crowell, Director  
Greg Lovato, Administrator

March 5, 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: *AP Area Down and Up Flushing Treatability Study Work Plan*

Dated: February 12, 2018

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. The soil flushing was demonstrated in the Central Retention Basin at the NERT site as an effective method to mobilize the perchlorate of vadose zone but relatively low mass reduction in the Test Plots 1 and 4 was observed and attributed to preferential flow through relatively narrow pathways in the vadose zone due to the reduced water application rates. NDEP suggests that NERT take a further look on the preferential flow issue if it can be improved the perchlorate mass reduction in this project;
2. Please provide more details on the vadose zone mass estimates and modeling as appendix in the this project result report;
3. The perchlorate mass reduction of vadose zone and UMCf should be separately reported before summing it together;
4. NDEP require details on the injection of the calcium polysulfide and tracer and these details should at least include total mass, injection rate, and movement distance and concentration along the flow paths. It is also good to know potential precipitate from the calcium polysulfide reactions and its impact on the porosity;
5. The final project result report should include electronic data of all raw monitoring data collected in Section 4.1.1 Performance Monitoring;
6. The final project result report should also include a map showing the plumbing system (pipe, flow meters), telemetry system and controls for extraction system, the location of the injection, the extraction and the monitoring wells.

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

EC:

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Carlton Parker, NDEP BISC Las Vegas  
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