



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

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

July 10, 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: *Unit 4 Source Area
In-Situ Bioremediation Bench-Scale Treatability Study Work Plan Modification
No. 1*

Dated: June 28, 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 flow-through column testing was proposed to assess performance under dynamic flow conditions (simulating different residence times) and evaluate potential for clogging due to precipitation or biofouling in order to determine design parameters for the field test in the Galleria Road ZVI-enhanced bioremediation treatability study work plan (Ramboll, 2017). The perchlorate and chromium concentration of the groundwater at the Galleria Road ZVI study site is much lower compared it at the Unit 4 source area, so the potential for clogging due to precipitation of biofouling at the Unit 4 source area is much higher. NDEP suggests that similar flow through column testing for the proposed ZVI study at the Unit 4 source area is carried out;
2. There are multiple daughter products from different stages of chloroform biodegradation. Besides the proposed dichloromethane, NDEP suggests monitoring the mass flux of other daughter products that signify the biodegradation of chloroform during the bench-scale kinetics study of chloroform.

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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Alison Fong, U.S. Environmental Protection Agency, Region 9
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