



December 14, 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: *Treatability/Pilot  
Study Modification No. 6 – Seep Well Field Area Bioremediation Treatability Study*

Dated: December 11, 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 shock chlorination via the application of chlorine dioxide or other chemicals to sterilize and destroy the biomass in the vicinity, or the addition of acidic agents to solubilize chemical precipitates is proposed for maintenance of injection well network. The perchlorate reducing bacteria can be impacted by these proposed chemicals, so NDEP suggests mainly using physical well rehabilitation methods to restore the injection delivery ability when they are applicable;
2. Figure 2 shows the perchlorate plume of the 10,000 ug/l shrinking and spreading for the period from July 2017 to September 2018 upper gradient area of the injection wells. The injection influence radius is generally less than 50 feet and is expected more influence in downgradient area of the injection wells. NDEP requires an explanation on the SWF Area Bioremediation Treatability Study Results Report;
3. NDEP suggests that NERT submit brief annual results report for the proposed extended treatability study;

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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Alison Fong, U.S. Environmental Protection Agency, Region 9  
Andrew Barnes, Geosyntec  
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