



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

Steve Sisolak, *Governor*
Bradley Crowell, *Director*
Greg Lovato, *Administrator*

January 18, 2019

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 Results Report (Reversion 1)*

Dated: December 21, 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. Amount of information collected in this project can be classified as a high-resolution site characterization project but the 3-D Geological Block Models for Plots 1 and 2 presented only the geological formation units. Besides detail sedimentary rock types documented in the boring logs, many laboratory tests on soil physical properties, aquifer tests, infiltration tests and chemical analyses were done and their results presented in Appendix A to J demonstrate more spatial and vertical geological variabilities but those results are not reflected in the 3-D geological block models for Plots 1 and 2 and discussed in the report. It is common practice that the data collected is needed fully to be utilized and analyzed.
2. The foot note of Table 1 shows "Pore volumes were calculated assuming a vadose zone thickness of 30 feet and a porosity value of 0.50 based on porosity data collected during this study" and this foot note is not consistent with the first Response to Comments (RTCs). RTCs state that the mass calculation in this revision follows the Mass Estimate for the Remedial Investigation Study Area (Ramboll Environ, Inc., 2018). It should also be noticed that the Mass Estimate for the Remedial Investigation Study Area (Ramboll Environ, Inc., 2018) is intended for regional mass estimate. Many site-specific data were collected from Plots 1 and 2, so the mass calculation for the treatability study sites should fully utilize the site-specific data collected through the site characterization.
3. Two additional rounds of dye sampling in January and February 2019 proposed in RTCs may not return meaningful results, so NDEP suggests not conducting additional dye sampling.

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

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