



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

**STATE OF NEVADA**  
Department of Conservation & Natural Resources  
Steve Sisolak, Governor  
Bradley Crowell, Director  
Greg Lovato, Administrator

December 2, 2019

Jay A. Steinberg  
Nevada Environmental Response Trust  
35 East Wacker Drive, Suite 690  
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: *In-Situ*  
*Bioremediation Injections Batch Mixing and Injections Field Guidance Document*

Dated: November 11, 2019

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. It would be useful to provide a more detailed description of procedures used to measure specific gravity (SG) of the diluted emulsion in the field.
2. It has been often observed problems with fouling of flow meters used to inject EOS. The guidance document indicates that the flow meters are periodically tested to ensure they are operating properly. It would be useful to provide more detail on how the flow meters are calibrated, how often, and include a testing log in the field documentation.
3. It appears that flow is measured at several points in the system during injection including at the individual wells and at the 240 gpm pump discharge. It would be useful to compare these flowrates and total volumes to ensure they match within an acceptable tolerance. It should also be possible to compare the amount of fluid discharged from the 240 gpm pump with physical measurements of the fluid depth in the Frac Tank.

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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Frederick Perdomo, Deputy Administrator NDEP  
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Carlton Parker, NDEP BISC Las Vegas  
Allan Delorme, Ramboll Environ  
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Kurt Fehling, The Fehling Group  
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Maria Lopez, Water District of Southern California  
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