



December 11, 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: *Las Vegas Wash*  
*Bioremediation Pilot Study Work Plan Addendum*

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. AECOM recently conducted the tracer study at three sites with similar hydrogeology. One of the three sites is located at this pilot study site. NDEP suggests that NERT review those tracer study results for designing the tracer study proposed in this study;
2. NDEP requires a detail design for proposed tracer study before the field implementation. The design should use the site specific data collected during the site characterization. Some components are expected in the design and they should at least include the direction, velocity, and pathway of groundwater from the tracer releasing points, the predicted dilution factor, traveling time, and concentration of the injected tracers at the designed monitoring locations, the monitoring tools and the sampling frequencies.
3. The addendum has some editorial issues and NDEP asks a supplemental document to explain and correct these issues:
  - 1) Section 2.7 Laboratory Studies, fourth paragraph, first sentence – "...column diffusion tests are constructed and expected to be completed in August 2019." Were the tests completed in August 2019? Please update text to reflect current status (Addendum is dated November 11, 2019).
  - 2) Section 3.2.2 Hydrogeology, third paragraph – "Depth to water measurements are provided in Table G.1 in Appendix G.1." This should refer to Table G.2 (Synoptic Depth to Water for Transect 1b Study Area) in Appendix G.
  - 3) Section 3.2.3.4.1 Groundwater Chemical and Geochemical Results, third bullet point, last sentence – "These low chromium concentrations suggest that chromium is not unlikely to be a problematic contaminant..." Double negative suggests opposite

message of that which is intended. Either “chromium is unlikely to be” or “chromium is not likely to be” would be adequate replacements.

- 4) Section 3.3 Preliminary Laboratory Bench-Scale Results, fourth paragraph – “It is anticipated that these column studies will be completed in September 2019.” Were the studies completed in September 2019? Please update text to reflect current status (Addendum is dated November 11, 2019).
- 5) Section 5.1.3.2.1 Injection Well Transect Location and Length, third paragraph – Third paragraph states that “Six pilot borings will be installed...” “Monitoring wells will be constructed at each location...” and “...groundwater sampling, slug testing, and NMR logging...will be performed at each of the five newly installed monitoring wells.” Will there be five wells or six wells? Please clarify.
- 6) Section 6.1.3 Effectiveness Monitoring Parameters, first paragraph, first sentence – “...microbial parameters listed in”. It looks that “Table 8” is left out.
- 7) Appendix H – Although it is evident from the text of the Addendum that the “100-series wells” and the “200-series wells” correspond to Transects 1a and 1b, respectively, it may be helpful to identify the transect in the title for each table in Appendix H.

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

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