



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

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

February 18, 2020

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: *Phase 3 Remedial
Investigation Modification No. 8*

Dated: February 3, 2020

Dear Mr. Steinberg,

The NDEP has received and reviewed the Trust's above-identified Deliverable and provides comments in Attachment A. A revised Deliverable should be submitted **by 03/19/2020** based on the comments found in Attachment A. The Trust should additionally provide an annotated response-to-comments letter as part of the revised Deliverable.

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:

Jeffrey Kinder, Deputy Administrator NDEP
Frederick Perdomo, Deputy Administrator NDEP
James Dotchin, NDEP BISC Las Vegas
Carlton Parker, NDEP BISC Las Vegas
Allan Delorme, Ramboll Environ
Alison Fong, U.S. Environmental Protection Agency, Region 9
Andrew Barnes, Geosyntec
Andrew Steinberg, Nevada Environmental Response Trust
Anna Springsteen, Neptune & Company Inc.
Betty Kuo Brinton, MWDH2O
Brenda Pohlmann, City of Henderson

Brian Loffman, lepetomane
Brian Waggle, Hargis + Associates
Carol Nagai, MWDH2O
Carrie Hunt, Olin Corporation
Chris Ritchie, Ramboll Environ
Chuck Elmendorf, Stauffer Management Company, LLC
Dan Pastor, P.E. TetraTech
Dave Share, Olin
Dave Johnson, LVVWD
David Parker, Central Arizona Water Conservation District
Derek Amidon, Tetrattech
Ebrahim Juma, Clean Water Team
Ed Modiano, de maximis, inc.
Eric Fordham, Geopentech
Gary Carter, Endeavour
George Crouse, Syngenta Crop Protection, Inc.
Greg Kodweis, SNWA
Harry Van Den Berg, AECOM
Jay Steinberg, Nevada Environmental Response Trust
Jeff Gibson, Endeavour
Jill Teraoka, MWDH2O
Joanne Otani
Joe Kelly, Montrose Chemical Corporation of CA
Joe Leedy, Clean Water Team
John Edgcomb, Edgcomb Law Group
John Pekala, Ramboll Environ
John Solvie, Calrk County Water Quasslity
Kelly McIntosh, GEI Consultants
Kirk Stowers, Broadbent & Associates
Kirsten Lockhart, Neptune & Company Inc.
Kim Kuwabara, Ramboll Environ
Kurt Fehling, The Fehling Group
Kyle.Hansen, Tetrattech
Lee Farris, BRC
Marcia Scully, Metropolitan Water District of Southern California
Maria Lopez, Water District of Southern California
Mark Duffy, U.S. Environmental Protection Agency, Region 9
Mark Paris, Landwell
Michael J. Bogle, Womble Carlyle Sandridge & Rice, LLP
Michael Long, Hargis +
Mickey Chaudhuri, Metropolitan Water District of Southern California
Nicholas Pogoncheff, PES Environmental, Inc.
Orestes Morfin, CAP
Paul Black, Neptune and Company, Inc.
Paul Hackenberry, Hackenberry Associates, LLC
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Todd Tietjen, SNWA

Attachment A

1. One of this modification goals is to determine the perchlorate plume extent in northern bank of the Las Vegas Wash. The new wells proposed are not well justified if they will be appropriate locations to be determined the northern extent of the perchlorate plume. NDEP suggests that NERT study all existing data of the groundwater table elevations and perchlorate concentrations and draw possible contours of groundwater table elevations and perchlorate concentrations. New wells should be placed to potential perchlorate plume extent that is based on either the BMI Regional Goals and Directives (NDEP, 2016) or 18 ppb that the Nevada Division of Environmental Protection has established as a provisional action level for Nevada.
2. “Nested groundwater monitoring wells on the south side of the LVW adjacent to the Three Kids Weir are needed to better understand the geology, hydrology, and contaminant transport in this area.” Was recommended in the Data Gap Investigation – Phase II Groundwater Quality Assessment (AECOM, November, 2019). NDEP suggests NERT address this recommendation in this modification.
3. NDEP suggests that NERT run particle tracking from upper gradient high groundwater perchlorate concentration areas of the proposed transects and estimate the perchlorate mass flux crossing the transects (S-1 to S-7) with Phase 6 model and justify if these transects are needed.