



May 6, 2021

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: *Annual Groundwater
Monitoring and GWETS Performance Report*

Dated: February 26, 2021

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. There is a statement on Page 74 indicating that "The shutdown of the three extraction wells in the vicinity of the Eastgate Storm Drain would have caused an immediate increase in the seepage rate of contaminated groundwater into the storm drain as groundwater levels recovered." Based on the groundwater gradient and the location of the Athens Road Extraction Wells (AREW), it is more plausible for AREW shutdowns to result in increased seepage rate into the Athens Drainage Channel rather than into the Eastgate Storm Drain.
2. Page 75 states that "this shut down [of Auto Mall Extraction Wells (AMEW) due to effluent tank replacement] would have caused an increase in the seepage rate of contaminated groundwater into the Pioneer Detention Basin." Based on groundwater equipotentials, it appears unlikely that groundwater from the AMEW area travels into the Pioneer Detention Basin during AMEW shutdown. Page 75 also states that this event resulted in accelerated travel of perchlorate into the downstream Eastgate Storm Drain, Athens Drainage Channel, and ultimately the Las Vegas Wash. The average perchlorate loading in the Eastgate Storm Drain during the 1H2020 reporting period, as well as during the individual months that make up the reporting period, was within the typical and expected range observed in recent years (15.8 lbs/day). Therefore, NDEP suspects that the higher than usual average perchlorate mass loading between Sunrise Mountain and Pabco Road during the latest NERT annual reporting period (19.8 lbs/day) could have been influenced by multiple factors.

3. Plate 7 Groundwater Chloroform Map Shallow Water-bearing Zone Second Quarter 2020 shows the chloroform contour value of 500 µg/L. There are 19 shallow wells with their chloroform value greater than 500 µg/L (510 to 7,800 µg/L) in the Unit Building #4 area and they are not contoured. NDEP understood that the Annual Groundwater Monitoring and GWETS Performance Report was intended to report the data from regular GWETS monitoring programs, but NDEP suggests that the report should utilize all existing data for constructing the contaminant plume map. This suggestion is also applicable for perchlorate, chromium and TDS.
4. The NERT is still investigating the OU-3, so NDEP reserves its comments on the sources to the perchlorate mass loading to the Las Vegas Wash until the completion of all remediation investigations.
5. The perchlorate mass fluxes crossing the boundaries between the operation units, model layers and southern bank of the Las Vegas Wash are heavily dependent on the NERT groundwater model that is still in developing, so NDEP also reserves its comments on these fluxes until the NERT groundwater model is finalized and approved.

Please contact the undersigned with any questions at wdong@ndep.nv.gov or 702-668-3929.

Sincerely,



Weiquan Dong, P.E.
Bureau of Industrial Site Cleanup
NDEP-Las Vegas City Office

WD:cp

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