



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor

Leo M. Drozdoff, P.E., Director

Colleen Cripps, Ph.D., Administrator

04, 25 2014

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: *Remedial Investigation and Feasibility Study Work Plan Revision 1, Nevada Environmental Response Trust Site, Henderson, Nevada*

Dated: January 10, 2014

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 05/25/2014** 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.
Special Projects Branch
Bureau of Corrective Actions
NDEP-Las Vegas City Office

WD:jd

EC: Greg Lovato, Bureau of Corrective Actions, NDEP
James Dotchin, NDEP, BCA LV
Dave Emme, NDEP
Adam Baas, Edgcomb Law Group
Allan Delorme, ENVIRON
Andrew Barnes, Geosyntec
Andrew Steinberg, Nevada Environmental Response Trust



Betty Kuo, MWDH2O
Brenda Pohlmann, City of Henderson
Brian Waggle, Hargis + Associates
Cassandra Joseph, AG's Office
Catherine Sties, MWDH2O
Charles K. Hauser, Esq., Southern Nevada Water Authority
Chuck Elmendorf, Stauffer Management Company, LLC
Dave Share, Olin
David Johnson, Central Arizona Water Conservation District
Ebrahim Juma, Clean Water Team
Ed Modiano, de maximis, inc.
Eric Fordham, Geopentech
George Crouse, Syngenta Crop Protection, Inc.
Dave Share, Olin Co
Jay Steinberg, Nevada Environmental Response Trust
Jeff Gibson, AMPAC
Jill Teraoka, MWDH2O
Joanne Otani
Joe Kelly, Montrose Chemical Corporation of CA
Joe Leedy, Clean Water Team
Joe McGinley McGinley & Associates
John Pekala, Environcorp
Kirk Stowers, Broadbent & Associates
Kurt Fehling, The Fehling Group
Kyle Gadleym, Geosyntec
Lee Farris, BRC
Marcia Scully, Metropolitan Water District of Southern California
Mark Paris, Landwell
Matt Pocernich, Neptune & Company Inc
Michael Long, Hargis + Associates
Mickey Chaudhuri, Metropolitan Water District of Southern California
Nicholas Pogoncheff, PES Environmental, Inc.
Paul Black, Neptune and Company, Inc.
Paul Hackenberry, Hackenberry Associates, LLC
Peggy Roefer, Southern Nevada Water Authority
Ranajit Sahu, BRC
Rebecca Shircliff, Neptune and Company, Inc.
Richard Pfarrer, TIMET
Rick Kellogg, BRC
Ron Zegers, Southern Nevada Water Authority
Scott Bryan, Central Arizona Project
Stephen Tyahla, U.S. Environmental Protection Agency, Region 9
Susan Crowley, Crowley Envirn.
Tanya O'Neill, Foley & Lardner LLP
Wayne Klomp, AG's Office

Attachment A

1. General Comment. Out-of-state MCIs should not be included in the RI/FS work plan as ARAR's. The NERT may consider the out-of-state MCLs as To-Be-Considered Standards (TBCs) for development of the RAOs.
2. Comment #76, NDEP requested clarification to Figure 5-4. In the response, ENVIRON agreed to revise Figure 5-4. However, the figure that was included in Revision 1 of the RI/FS Work Plan (January 10, 2014) is identical to the original figure.
3. Although not associated with an NDEP comment, ENVIRON made revisions to Table 5-1 which included the addition of several more footnotes. However, this inadvertently deleted the end of Footnote #1, which explains that arsenic contamination was compared to "a site-specific background concentration of 7.2 mg/Kg".
4. Section 5.4.2 Groundwater. It was noted that in the middle of the first paragraph on page 90 of the Revision 1, the text refers to wells EAST of the AWF. The wells are actually WEST of the AWF, as shown on Figure 5-12a.