STATE OF NEVADA

Leo M. Drozdoff, P.E., Director David Emme, Administrator





May 19, 2016

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: Unit 4 and 5

Buildings Investigation First Mobilization

Dated: May 9, 2016

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. One of the major purposes for Unit 4 and 5 Buildings Investigation is to determine the mass of contaminants (e.g. perchlorate and chromium) in vadose zone and saturated zone. Figure 8 (Perchlorate Discrete-Depth Groundwater Results) of this report shows the highest perchlorate concentration at the deepest of the four wells, which doesn't tell vertical extent of the perchlorate contaminated groundwater. Although the proposed three boreholes are 25 feet deeper, it is still possible that these three new boreholes are not deep enough to define the vertical extent of the contaminated groundwater. Therefore, NDEP suggests that NERT design the three proposed boreholes to meet following goals:
 - a. Determine vertical extent of the contaminated groundwater by perchlorate and chromium;
 - b. Determine if the contaminants found in shallow water bear zone reach the groundwater in second coarse grain of Upper Muddy Creek Formation (UMCf-cg2);
 - Prevent potential vertical migration of the contaminants caused by the proposed boreholes;
- 2. Provide a map showing the boring logs/wells that a utility is encountered in first 12 feet and a well is moved from planned location to avoid the utilities;

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> All data generated from Unit 4 and 5 Buildings Investigation will have a data validation summary report (DVSR) and electronic data deliverable (EDD) after completing all phases of the Unit 4 and 5 Buildings Investigation.

Please contact the undersigned with any questions at wdong@ndep.nv.gov or 702-486-2850 x252.

Sincerely,

Weiguan Dong, P.E.

Bureau of Industrial Site Cleanup

NDEP-Las Vegas City Office

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