STATE OF NEVADA





Brian Sandoval, Governor Bradley Crowell, Director Greg Lovato, Administrator

December 27, 2017

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: Nevada Environmental Response Trust (Trust) Response to Nevada Division of Environmental Protection (NDEP) November 29, 2017 Comments on the Data Validation Summary Report (DVSR) and Electronic Data Deliverable (EDD) for March 2015 Soil Gas Remedial Investigation Sampling, dated October 17, 2017

Dated: December 19, 2017

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 01/27/2018 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:

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 Waggle, Hargis + Associates

Carol Nagai, MWDH2O

Chinny Esakkiperumal, Olin Corporation

Chris Ritchie, Ramboll Environ

Chuck Elmendorf, Stauffer Management Company, LLC

Dan Pastor, P.E. TetraTech

Dave Share, Olin

Dave Johnson, LVVWD

Derek Amidon, Tetratech

Ebrahim Juma, Clean Water Team

Ed Modiano, de maximis, inc.

Eric Fordham, Geopentech

Gary Carter, Endeavour

George Crouse, Syngenta Crop Protection, Inc.

Harry Van Den Berg, AECOM

Jay Johnson, Central Arizona Water Conservation District

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

Kelly McIntosh, GEI Consultants

Kevin Fisher, LV Valley Water District

Kirk Stowers, Broadbent & Associates

Kirsten Lockhart, Neptune & Company Inc.

Kim Kuwabara, Ramboll Environ

Kurt Fehling, The Fehling Group

Kyle Gadley, Geosyntec

Kyle. Hansen, Tetratech

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 + Associates

Micheline Fairbank, AG Office

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

Patti Meeks, Neptune & Company Inc.

Peggy Roefer, CRC

Ranajit Sahu, BRC

Richard Pfarrer, TIMET

Rick Kellogg, BRC

Scott Bryan, Central Arizona Project

Steve Clough, Nevada Environmental Response Trust Steven Anderson, LVVWD Tanya O'Neill, Foley & Lardner L Todd Tietjen, SNWA

Attachment A

1. **Table V and EDD:** Fifty-two results were qualified "JC" or "JBC" by the laboratory. These cannister certification results are not discussed in the text. Please add a discussion to the text and also include text regarding the professional judgment used in the decision not to qualify these results. If in the process it is decided that some (or all of the results) should be qualified, please provide an updated EDD.