



November 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: RE: *Nevada Division of Environmental Protection (NDEP) July 31, 2020 Response to: Transmittal of RI/FS Work Plan Addendum: Phase 3 Remedial Investigation, Revision 1; Response to July 11, 2017 Letter and Comments from the Lower Colorado River Water Quality Partnership and Response to August 29, 2017 Comments from NDEP on the May 5, 2017 RI/FS Work Plan Addendum; Phase 3 Remedial Investigation Dated October 27, 2017*

Dated: November 3, 2020

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. The timeframe the Phase 6 model simulated is from 2014 to 2018, so the particle tracking simulations presented are appropriate for the period of 2014 to 2018. The groundwater conditions of BMI region have been significantly evolving starting from 1980s. The important events that have affected the groundwater conditions include the discontinued use of the ditches and ponds, the pump-treat systems operated by OSSM, NERT, TIMET and Endeavour, the barrier walls installed by NERT and TIMET, soil excavations by each responsible party and land use change within BMI and Las Vegas regions. The groundwater conditions play vital roles on the particle tracking simulations, so the particle tracking is likely different prior 2014.
2. If additional information is found using subsequent NERT Groundwater Models, particle tracking simulations, etc. that changes the current understanding of groundwater migrating from the NERT site west of Pabco Road and subsequently into Operable Unit #3 (OU-3) the NDEP may require additional investigation in OU-3 at that time.

Please contact the undersigned with any questions at [wdong@ndep.nv.gov](mailto: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

EC:

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Frederick Perdomo, Deputy Administrator NDEP  
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Allan Delorme, Ramboll Environ  
Andrew Barnes, Geosyntec  
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