

Steve Sisolak, Governor Bradley Crowell, Director Greg Lovato, Administrator

January 19, 2022

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: Semi-Annual Groundwater Monitoring and GWETS Performance Report, July – December 2020 performance period and Associated DVSR/EDD

Dated: November 9, 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. 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.
- 2. Section 5.4 Completeness. The table lists 507 anion results reported. The EDD indicates two of those results (Nitrate) are flagged with "orr". The chromium VI, perchlorate, and chlorate results were reduced by the respective number of results flagged with "orr". Please present the total results reported consistently across all analyses. Check the total results for all analyte results and the total for anions. Please re-submit electronic DVSR with an explanation after addressing the inconsistence.

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

Sincerely,

Bong Weiquan

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

WD:cp

EC:

EC:

Jeffrey Kinder, Deputy Administrator NDEP Frederick Perdomo, Deputy Administrator NDEP James Dotchin, NDEP BISC Las Vegas Carlton Parker, NDEP BISC Las Vegas Alan Pineda, NDEP BISC Las Vegas Allan Delorme, Ramboll Environ Andrew Barnes, Geosyntec Andrew Steinberg, Nevada Environmental Response Trust Anna Springsteen, Neptune & Company Inc. Betty Kuo Brinton, M Metropolitan Water District of Southern California Brian Waggle, Hargis + Associates Brian Loffman, Nevada Environmental Response Trust Brian Rakvica, Syngenta Carol Nagai, Metropolitan Water District of Southern California Carrie Hunt, Olin Corporation Chris Ritchie, Ramboll Environ Christine Klimek, City of Henderson 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 Greg Kodweis, SNWA Jay Steinberg, Nevada Environmental Response Trust Jeff Gibson, Endeavour Jill Teraoka, Metropolitan Water District of Southern California Joanne Otani, The Fehling Group Joe Kelly, Montrose Chemical Corporation of CA Joe Leedy, Clean Water Team John Edgcomb, Edgcomb Law Group John Pekala, Ramboll Environ John Solvie, Clark County Water Quality Kathrine Callaway, Cap-AZ Kelly McIntosh, GEI Consultants Kirk Stowers, Broadbent & Associates Kirsten Lockhart, Neptune & Company Inc. Kim Kuwabara, Ramboll Environ Kurt Fehling, The Fehling Group Lee Farris, BRC Marcia Scully, Metropolitan Water District of Southern California Maria Lopez, Metropolitan Water District of Southern California

Mark Duffy, U.S. Environmental Protection Agency, Region 9 Mark Paris, Landwell Mauricio Santos, Metropolitan Water District of Southern California Michael J. Bogle, Womble Carlyle Sandridge & Rice, LLP Michael Long, Hargis + Mickey Chaudhuri, Metropolitan Water District of Southern California Nicholas Pogoncheff, PES Environmental, Inc. Nicole Moutoux, U.S. Environmental Protection Agency, Region 9 Orestes Morfin, CA Paul Black, Neptune & Company Peggy Roefer, CRC Peter Jacobson, Syngenta Ranajit Sahu, BRC Rebecca Sugerman, U.S. Environmental Protection Agency, Region 9 **Richard Pfarrer**, TIMET Rick Kellogg, BRC R9LandSubmit@EPA.gov Steve Clough, Nevada Environmental Response Trust Steven Anderson, LVVWD Steve Armann, U.S. Environmental Protection Agency, Region 9 Tanya O'Neill, Foley & Lardner L Todd Tietjen, SNWA William Frier, U.S. Environmental Protection Agency, Region 9