

Steve Sisolak, Governor James R. Lawrence, Acting Director Greg Lovato, Administrator

September 16, 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: DVSR and EDD of Semi-Annual Groundwater Monitoring and GWETS Performance Sampling July through December 2021 Rev. 0

Dated: April 15, 2022

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 **11/16/2022** 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 702-668-3929.

Sincerely,

Dong Weiguan

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

WD:cp

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 Andrew Barnes, Geosyntec Andrew Steinberg, Nevada Environmental Response Trust Anna Springsteen, Neptune & Company Inc.

Betty Kuo Brinton, 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 Chris Ritchie, Ramboll Christine Klimek, City of Henderson Chuck Elmendorf, Stauffer Management Company, LLC Dan Pastor, P.E. TetraTech Dan Petersen, Ramboll Dane Grimshaw, Olin Daniel Chan, SNWA Darren Croteau, Terraphase Engineering, Inc. 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 Jay A. 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-Paul Rossi, Stauffer Management Company LLC John Solvie, Clark County Water Quality Kathrine Callaway, Cap-AZ Karen Gastineau, Broadbent & Associates Kelly McIntosh, GEI Consultants Kirk Stowers, Broadbent & Associates Kirsten Lockhart, Neptune & Company Inc. Kim Kuwabara, Ramboll Kurt Fehling, The Fehling Group Laura Dye, CRC 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 Melanie Hanks, Olin 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 Peter Jacobson, Syngenta Ranajit Sahu, BRC Rebecca Sugerman, U.S. Environmental Protection Agency, Region 9 **Richard Pfarrer**, TIMET Rick Kellogg, BRC

R9LandSubmit@EPA.gov Roy Thun, GHD 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

Attachment A

DVSR Review:

1. Sample I-E-20210803 result for Nitrate as N was reported outside the calibration range. Please provide an explanation why the sample was not diluted and reanalyzed.

EDD Review

File "NERT 2201 EDD Rev 0.accdb"

1. The EDD is acceptable.