



June 5, 2024

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 Property**  
**NDEP Facility ID #H-000539**  
Nevada Division of Environmental Protection (NDEP) Response to: *Focused Baseline Health Risk Assessment for 8th Street*

Dated: February 9, 2024

Dear Mr. Steinberg,

The NDEP has reviewed the above-identified Deliverable and provides the following comments:

The Focused Baseline Health Risk Assessment (Focused BHRA) addresses a corridor that is approximately 44 ft wide and 1,000 ft in length (about 1 acre) where 8th Street runs through the middle of a property formerly owned by NERT that was known as Sale Parcel H. The corridor is described in the Executive Summary of the Focused BHRA as “containing an asphalt-paved road with an adjoining parkway, which is unpaved and sparsely vegetated.” The approximate area of Parcel H is 25 acres. After soil remediation activities, a risk assessment for Parcel H was completed by Ramboll for future indoor and outdoor commercial/industrial workers and construction workers. A determination of No Further Action for NERT Parcel H was made by NDEP in 2018 for commercial and industrial land use.

A technical memorandum describing sampling and analysis to support a BHRA for the 8th Street property was prepared by Ramboll in August 2022 and approved by NDEP in the same month. The memo indicated that three borings would be completed to a depth of 10 ft along the 8th Street corridor, with soil samples collected at approximate depths of 0 to 2 feet below ground surface (bgs) and 8 to 10 feet bgs. Twenty-three analyses were specified for the soil samples for constituents including asbestos, various metals, radionuclides, major ions, pesticides, polychlorinated biphenyl (PCB) Aroclors, polynuclear aromatic hydrocarbons, and volatile and semivolatile organic compounds

It should be noted that before the Focused BHRA and the Parcel H risk assessment, these two units were components of the southern half of what was called Remediation Zone A (RZ-A). The RZ-A area was identified as having metals concentrations that were statistically less than the McCullough background concentrations. Consequently, the RZ-A data were identified as their own local area background dataset. The metals concentrations of RZ-A have been previously

defined as local background for the southern half of the NERT property and they have been used for background comparisons for NERT subareas in the past.

Thus, it is recommended that NERT submit a No Further Action (NFA) request for the parcel and provide supporting documentation such as:

- A conceptual site model demonstrating the lack of past operational processes or activities in the 8th Street Parcel; and
- Current and anticipated future use scenarios.
- References to the Parcel H BHRA, and documents indicating that this area has lower concentrations than McCullough background and has been used as local background for other reports (e.g., such as Parcel H).

Please contact the undersigned with any questions at [alan.pineda@ndep.nv.gov](mailto:alan.pineda@ndep.nv.gov) or 702-668-3925.

Sincerely,



Alan Pineda, P.E.  
Bureau of Industrial Site Cleanup  
NDEP-Las Vegas City Office

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