



October 3, 2024

Jay A. Steinberg
Nevada Environmental Response Trust
35 East Wacker Drive, Suite 690
Chicago, IL 60601

Subject: No Further Action Determination – NERT Parcel E

Facility: Tronox LLC (TRX) Facility
Nevada Environmental Response Trust (Trust) Property
Clark County, Nevada
APNs 178-12-101-005 & 178-12-201-009
NDEP Facility ID #H-000539

Dear Mr. Steinberg,

The Nevada Division of Environmental Protection (NDEP) has received and reviewed the May 22, 2024 *Compilation of Select Health Risk Assessment Documents for Parcel E: 2008 to 2023* (Deliverable). This Deliverable was prepared under the responsible charge of Ms. Kimberly Kuwabara, CEM of Ramboll Americas Engineering Solutions, Inc. on behalf of Nevada Environmental Response Trust (Trust) for the above-referenced areas. The Deliverable contains a request for a no further action determination from the NDEP.

The NDEP has reviewed the following information and has determined that no further assessment or remediation of soil is required:

1. A voluntary Environmental Covenant (EC) has been prepared and executed in accordance with Nevada Revised Statutes 445D relating to the prospective use of the subject property;
2. A formal human health risk assessment; and
3. Supporting technical data.

The EC was recorded on September 4, 2024 with the Clark County Recorder's office for the areas designated above, and therefore the EC (as may be amended in the future by agreement of the NDEP and the owner of the property) is a matter of public record.

Parcel E is further depicted and described in the attachment of this letter (legal descriptions and maps for Parcel E).

Please contact the undersigned with any questions at cschoop@ndep.nv.gov or 702-668-3926.

Sincerely,



Chad Schoop, P.E.
Bureau of Industrial Site Cleanup
NDEP-Las Vegas Office

cc: Rick Perdomo, Deputy Administrator, NDEP, Carson City
James Dotchin, NDEP-BISC, Las Vegas
Alan Pineda, NDEP-BISC
Esther Franco, NDEP-BISC Las Vegas
Aaron Welch, Central Arizona Project
Adam Schwartz, Central Arizona Project
Andrew Steinberg, Nevada Environmental Response Trust
Andy Bittner, Gradient
Anna Springsteen, Neptune & Company Inc.
Ashley Green, Vice President, Montrose Chemical Corporation of CA
Betty Kuo Brinton, Metropolitan Water District of Southern California
Brian K. Loffman, Le Petomane, Inc
Candace Jantzen-Marson, WSP
Carol Nagai, Metropolitan Water District of Southern California
Chris Ritchie, Ramboll
Christine Klimek, City of Henderson
Christine Nelson, Central Arizona Project
Chuck Elmendorf, Stauffer Management Company
Chuck Frey, GHD
Dana Grady, Tetra Tech
Dan Petersen, Ramboll
Dane Grimshaw, Olin Corporation
Daniel Chan, Southern Nevada Water Authority
Danielle E. Greene, Colorado River Commission of Nevada
Darren Croteau, Terraphase Engineering
Dave Share, Olin Corporation
Dave Johnson, Las Vegas Valley Water District
David Bohmann, Tetra Tech
Dean Charles, de maximis, inc.
Deena Hannoun, Southern Nevada Water Authority
Ed Modiano, de maximis, inc.
Elliot Min, Metropolitan Water District of Southern California
Eric Fordham, GeoPentech
Gary Carter, Endeavour LLC
James M. Wright, Wyman Gordon
Jay Johnson, Central Arizona Project
Jeff Gibson, Endeavour LLC
Jill Roberts, GEI Consultants
Jill Teraoka, Metropolitan Water District of Southern California

John Solvie, Clean Water Team
Karen Gastineau, Broadbent & Associates
Kathrine Callaway, Central Arizona Project
Kelly Richardson, Latham & Watkins LLP
Kim Kuwabara, Ramboll
Kirk Stowers, Broadbent & Associates
Kirsten Lockhart, Neptune & Company Inc.
Kurt Fehling, The Fehling Group
Lauren Brandt, U.S. Environmental Protection Agency, Region 9
Lee Farris, Basic Remediation Company
Lisa Funderburg, Olin Corporation
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
Matt Trawick, U.S. Environmental Protection Agency, Region 9
Matthew Mayo, Gradient
Mauricio Santos, Metropolitan Water District of Southern California
Melanie Hanks, Olin Corporation
Michael J. Bogle, Womble Carlyle Sandridge & Rice, LLP
Mike Hockley, President, Montrose Chemical Corporation of CA
Nicholas Pogoncheff, ETIC
Nicole Bradley, de maximis, inc.
Nicole Palazzolo, U.S. Environmental Protection Agency, Region 9
Orestes Morfin, Central Arizona Project
Paul Black, Neptune & Company, Inc.
Peter Jacobson, Syngenta
Ranjit Sahu, Basic Remediation Company
Rebecca Sugerman, U.S. Environmental Protection Agency, Region 9
Rick Kellogg, Basic Remediation Company
Roy Thun, Broadbent & Associates
Ruth Beyer, Precision Castparts Corp.
R9LandSubmit@EPA.gov
Spencer Lapiers, de maximis inc.
Steve Clough, Nevada Environmental Response Trust
Steven Anderson, Las Vegas Valley Water District
Tanya O'Neill, Foley & Lardner LLP
Todd Tietjen, Southern Nevada Water Authority
Walter Nelson, WSP
Warren Turkett, Colorado River Commission of Nevada
Weiquan Dong, Southern Nevada Water Authority
William Carson, Terraphase Engineering
William Frier, U.S. Environmental Protection Agency, Region 9
Zeitel Senitz, de maximis inc.



AtkinsRéalis

2270 Corporate Circle, Suite 200
Henderson, Nevada 89074

Telephone: 702.990.7432

atkinsrealls.com

LEGAL DESCRIPTION APN 178-12-101-005

A PARCEL OF LAND BEING A PORTION OF THAT REAL PROPERTY DESCRIBED AS PARCEL 1, IN THAT CERTAIN QUITCLAIM DEED, INSTRUMENT NUMBER 201102170003603, IN THE OFFICE OF THE RECORDER, CLARK COUNTY, NEVADA, SITUATE IN THE NORTH HALF (N1/2) OF THE NORTHWEST QUARTER (NW1/4) OF SECTION 12, TOWNSHIP 22 SOUTH, RANGE 62 EAST, M.D.M., CITY OF HENDERSON, CLARK COUNTY, NEVADA, MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCING (P.O.C.) AT THE NORTHWEST CORNER OF SAID SECTION 12, THENCE SOUTH 01°46'08" WEST, ALONG THE WESTERLY LINE THEREOF, A DISTANCE OF 534.38 FEET, TO THE **POINT OF BEGINNING (P.O.B.)**; THENCE DEPARTING SAID WEST LINE, SOUTH 53°03'54" EAST, ALONG THE BOUNDARY LINE OF PARCEL 1, FILE 125 OF PARCEL MAPS, PAGE 87, IN THE OFFICE OF SAID RECORDER, A DISTANCE OF 1061.51 FEET; THENCE SOUTH 36°56'06" WEST, CONTINUING ALONG SAID BOUNDARY LINE, A DISTANCE OF 180.55 FEET TO THE SOUTH LINE OF THE NORTHWEST QUARTER (NW1/4) OF THE NORTHWEST QUARTER (NW1/4) OF SAID SECTION 12; THENCE DEPARTING SAID BOUNDARY LINE NORTH 89°50'47" WEST, ALONG SAID SOUTH LINE, A DISTANCE OF 367.22 FEET TO THE BOUNDARY LINE OF SAID PARCEL 1; THENCE NORTH 55°36'31" WEST, ALONG SAID BOUNDARY LINE, 471.01 FEET TO SAID WEST LINE OF SECTION 12; THENCE DEPARTING SAID BOUNDARY LINE, NORTH 01°46'08" EAST, ALONG SAID WEST LINE, A DISTANCE OF 515.40 FEET TO THE **POINT OF BEGINNING (P.O.B.)**.

CONTAINING 7.84 ACRES (341,317 SQUARE FEET), MORE OR LESS, AS DETERMINED BY COMPUTER METHODS, AND AS SHOWN ON EXHIBIT "B" ATTACHED HERETO AND MADE A PART HEREOF.

BASIS OF BEARINGS

THE BASIS OF BEARINGS FOR THIS LEGAL DESCRIPTION IS NORTH 01°46'08" EAST, BEING THE WEST LINE OF THE NORTHWEST QUARTER (NW1/4) OF THE NORTHWEST QUARTER (NW1/4) OF SECTION 12, TOWNSHIP 22 SOUTH, RANGE 62 EAST, M.D.M., AS SHOWN BY FILE 125 OF PARCEL MAPS, PAGE 87, IN THE OFFICE OF THE RECORDER, CLARK COUNTY, NEVADA.

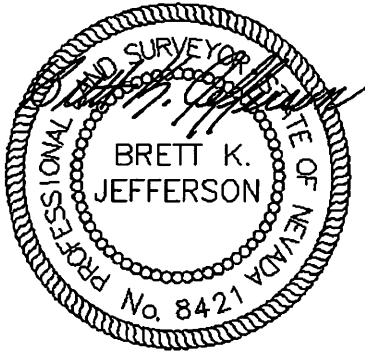
END OF DESCRIPTION.

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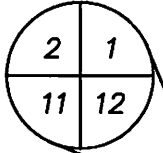
EXPIRES: 06/30/2025
04/09/2024

BRETT K. JEFFERSON, P.L.S.
NEVADA LICENSE NUMBER 8421
PHONE: (702) 990-7428
EMAIL: BRETT.JEFFERSON@ATKINSREALIS.COM

NOTE : THIS LEGAL DESCRIPTION IS PROVIDED AS A CONVENIENCE AND IS NOT INTENDED TO BE USED FOR THE PURPOSE OF SUBDIVIDING LAND NOT IN CONFORMANCE WITH NEVADA REVISED STATUTES.

APN: 178-12-101-005

SECTION 12
TOWNSHIP 22 SOUTH
RANGE 62 EAST, M.D.M.



GLO BRASS CAP
PLS "1942"
PER PM 125-87



P.O.C.

LEGEND

P.O.C.
P.O.B.

POINT OF COMMENCEMENT
POINT OF BEGINNING



BOUNDARY AREA: 341,317 S.F.
(7.84 ACRES)

S01°46'08"W
534.38'

P.O.B.

178-12-201-011
PARCEL 1
PM 125-87
NOT A PART

BASIS OF BEARING

N01°46'08"E
515.40'

S53°03'54"E
1,061.51'

178-12-101-005

AL CAP
PLS "4541"
PER SV 80-100

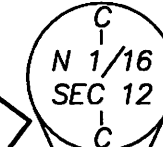
ESTABLISHED
AT MIDPOINT



265.11'

N55°36'31"W
471.01'

S36°56'06"W
180.55'



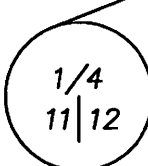
S89°50'47"E
396.86'

N89°50'47"W
367.22'

S89°50'47"E
1,800.76'

S01°46'08"W
1,315.37'

178-12-201-009
NOT A PART



ESTABLISHED
PER SV 80-100

AtkinsRéalls
 2270 Corporate Circle,
 Suite 200
 Henderson, NV 89074-7755.
 Telephone: 702/263-7275
 Fax: 702/263-7200

NEVADA ENVIRONMENTAL
RESPONSE TRUST - POR. PARCEL E

JOB NO. 100089575

DRAWN: JSD

DATE: 4/10/2024

SHEET NO. 1 of 1

CHECKED: BKJ

SCALE: 1"=200'



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LEGAL DESCRIPTION

APN 178-12-201-009

A PARCEL OF LAND BEING A PORTION OF THAT REAL PROPERTY DESCRIBED AS PARCEL 2, IN THAT CERTAIN QUITCLAIM DEED, INSTRUMENT NUMBER 201102170003603, IN THE OFFICE OF THE RECORDER, CLARK COUNTY, NEVADA, SITUATE IN THE SOUTH HALF (S1/2) OF THE NORTHWEST QUARTER (NW1/4) OF SECTION 12, TOWNSHIP 22 SOUTH, RANGE 62 EAST, M.D.M., CITY OF HENDERSON, CLARK COUNTY, NEVADA, MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCING (P.O.C.) AT THE NORTHWEST CORNER OF SAID SECTION 12, THENCE SOUTH 01°46'08" WEST, ALONG THE WESTERLY LINE THEREOF, A DISTANCE OF 1049.78 FEET; THENCE DEPARTING SAID WESTERLY LINE, SOUTH 55°36'31" EAST ALONG THE BOUNDARY LINE OF PARCEL 1 OF FILE 125 OF PARCEL MAPS, PAGE 87, IN THE OFFICE OF SAID RECORDER, A DISTANCE OF 471.01 FEET TO THE NORTHERLY LINE OF SOUTH HALF (S1/2) OF THE NORTHWEST QUARTER (NW1/4) OF SAID SECTION 12, SAME BEING THE **POINT OF BEGINNING (P.O.B.)**; THENCE DEPARTING SAID BOUNDARY LINE, SOUTH 89°50'47" EAST ALONG SAID NORTHERLY LINE, A DISTANCE OF 367.22 FEET TO SAID BOUNDARY LINE; THENCE SOUTH 36°56'06" WEST ALONG SAID BOUNDARY LINE, A DISTANCE OF 206.81 FEET; THENCE NORTH 55°36'31" WEST CONTINUING ALONG SAID BOUNDARY LINE, A DISTANCE OF 294.41 FEET TO THE **POINT OF BEGINNING (P.O.B.)**.

CONTAINING 30,414 SQUARE FEET (0.70 ACRES), MORE OR LESS, AS DETERMINED BY COMPUTER METHODS, AND AS SHOWN ON EXHIBIT "B" ATTACHED HERETO AND MADE A PART HEREOF.

BASIS OF BEARINGS

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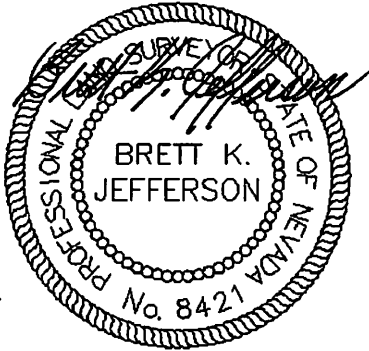
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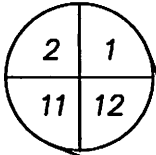
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APN: 178-12-201-009

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GLO BRASS CAP
PLS "1942"
PER PM 125-87

P.O.C.



LEGEND

P.O.C.
P.O.B.

POINT OF COMMENCEMENT
POINT OF BEGINNING



BOUNDARY AREA: 30,414 S.F.
(0.70 ACRES)

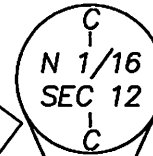
BASIS OF BEARING
S01°46'08"W
1,049.78'

178-12-201-011
PARCEL 1
PM 125-87
NOT A PART

178-12-101-005
NOT A PART

AL CAP
PLS "4541"
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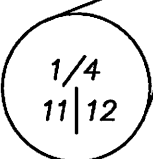
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