

Mr. Weiquan Dong, PE
Bureau of Industrial Site Cleanup
Nevada Division of Environmental Protection
2030 E. Flamingo Rd., Suite 230
Las Vegas, NV 89119

**SITE MANAGEMENT PLAN, REVISION 2 WITH NDEP COMMENTS ADDRESSED
NEVADA ENVIRONMENTAL RESPONSE TRUST SITE
HENDERSON, NEVADA**

Dear Mr. Dong,

On July 17, 2015, Ramboll Environ on behalf of the Nevada Environmental Response Trust (NERT or the Trust), submitted the Site Management Plan (SMP), Revision 2 for the NERT Site in Henderson, Nevada, to NDEP for review. On July 23, 2015, we received NDEP's comments on the SMP, Revision 2. Ramboll Environ has accepted and addressed all of NDEP's comments. Please find enclosed only the pages of the SMP, Revision 2 that had revisions and please replace these pages in your hard copy. The entire revised SMP, Revision 2 can be downloaded electronically from NDEP's ftp site or from: <https://environcorp.box.com/s/nequaic9em36dmffhi32i17g7saqp09s>.

Date July 30, 2015

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Please contact John Pekala at (602) 734-7710 or Allan DeLorme at (510) 420-2565 if you have any comments or questions concerning this report.

Yours sincerely,



John M. Pekala, PG
Senior Manager
CEM #2347, expires 9/20/2016



Allan J. DeLorme, PE
Principal

Attachment

cc: BMI Compliance Coordinator, NDEP, BISC, Las Vegas

ec: James Dotchin, NDEP
Nevada Environmental Response Trust
Tanya O'Neill, Foley & Lardner LLP
Kirk Stowers, Broadbent & Associates, Inc.
Chuck Elmendorf, Stauffer
Nick Pogoncheff, Syngenta
Lee Farris, Landwell
Ranajit Sahu, BMI
Joe Kelly, Montrose

Paul Sundberg, Montrose
Curt Richards, Olin
David Share, Olin
Kurt Fehling, The Fehling Group
Jeff Gibson, AMPAC
Mark Paris, BMI George Crouse, Syngenta
Richard Pfarrer, TIMET
Enoe Marcum, WAPA
Ed Modiano, *de maximis, inc.*

Table 6		
Contact Information		
Entity Name	Address and Phone Number	Contact Name
Nevada Division of Environmental Protection (NDEP) Bureau of Industrial Site Cleanup (BISC) http://ndep.nv.gov/bmi/index.htm	2030 E Flamingo Rd, Suite 230 Las Vegas, NV 89119 (702) 486-2850 Ext 235	<u>Primary Contacts:</u> James (JD) Dotchin, Chief, Environmental Programs Weiquan Dong, Professional Engineering Specialist
Nevada Environmental Response Trust (NERT or the Trust)	35 East Wacker Drive, Suite 1550 Chicago, IL 60601 (312) 505-2688 (office)	Jay A. Steinberg, not individually but solely as President of the Environmental Trust Trustee
	510 4 th Street Henderson, NV 89015 (702) 686-9611 (office)	Steve Clough, Remediation Director
	2200 Powell Street, Suite 700 Emeryville, CA 94608 (510) 655-7400 (office)	Allan J. DeLorme, Ramboll Environ, Principal John M. Pekala, Ramboll Environ, Senior Manager
	1489 West Warm Springs Rd, Ste. 110 Henderson, NV 89014 (702) 966-8340 (office)	Kyle Hansen, Tetra Tech, Inc. (Tetra Tech), Field Operations Manager/Geologist
Tronox, LLC (Lessee; Site Occupant)	P.O. Box 55 Henderson, NV 89009-7000 (702) 651-2233 (office)	Fredrick R. Stater, Plant Manager – Henderson
Envirogen Technologies, Inc. (ETI) (Groundwater Extraction and Treatment System [GWETS] operator)	510 4th Street Henderson, NV 89015 (702) 371-9307 (mobile)	Wendy Prescott, Project Manager

Checklist of Notification and Reporting Requirements to NDEP and the Trust for Site Occupants¹

Site Occupants are required to notify and receive approval from both the Trust and NDEP (unless otherwise noted) of the following activities:

General Site

- ___ Notify the Trust prior to the use or addition of new processes or hazardous materials (see Section 3.1 of the main Site Management Plan [SMP] document).
- ___ Notify the Trust and NDEP prior to conducting any activity where Site workers could potentially come in contact with contaminated soil or groundwater (see Section 3.1 of the main SMP document).

Soil

- ___ Notify the Trust and NDEP and receive approval of project category by NDEP prior to performing a Utility Project or an Emergency Project, and comply with all applicable requirements in Section 4.6 (Utility Projects) or Section 4.7 (Emergency Projects) and Section 5 (Risk Management for Groundwater). These are the only requirements of the SMP with which a Site Occupant performing an approved Utility Project or Emergency project must comply.
- ___ Notify the Trust and NDEP prior to disturbing soil within an ECA (as defined in Section 4.1 of the main SMP document). A work plan must be submitted for approval by NDEP, after the Trust's review (see Section 4.1 of the main SMP document).
- ___ Stop work and notify the Trust and NDEP within 24 hours of discovering previously unknown soil contamination or buried debris. In addition, the NDEP 24-hour Spill Notification Line must be called, if required, whenever unknown soil contamination or buried debris is discovered at the Site (see Section 4.3 of the main SMP document).
- ___ Notify the Trust and NDEP when the results of chemical testing from excavated soil samples indicate the soil contains COPCs at concentrations that exceed the soil screening levels for the Site (including BCLs as well as Site-specific levels (Table 1 of the main SMP document). The most recent version of the BCLs, which can be found on the NDEP website (<http://ndep.nv.gov/bmi/technical.htm>) should be used (see Sections 4.2.3 and 4.3.4 of the main SMP document).
- ___ Notify the Trust and NDEP within 24 hours of receiving post-excavation confirmation sample results that indicate COPCs are present in remaining soils at concentrations that exceed soil screening levels (Table 1 of the main SMP document) for the Site (see Sections 4.2.4 and 4.3.5 of the main SMP document).

1. INTRODUCTION

This report provides a summary of areas where known impacted soil has been left in-place and areas where uncharacterized potentially contaminated soils might be located at an approximately 264-acre site in unincorporated Clark County, surrounded by the City of Henderson, Nevada (the Site). These areas have been designated as Excavation Control Areas (ECAs).

The Site was previously owned and operated by Tronox LLC (Tronox). Prior to Tronox, the Site was owned and operated by Kerr McGee Chemical LLC. The Site is currently owned by the Nevada Environmental Response Trust (the Trust), which was created in conjunction with the settlement of Tronox's bankruptcy proceeding on February 14, 2011.