NEVADA DIVISION OF
ENVIRONMENTAL
PROTECTION

STATE OF NEVADA
Department of Conservation & Natural Resources
Steve Sisolak, Governor
Bradley Crowell, Director
Greg Lovato, Administrator

June 2, 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: Baseline Health Risk Assessment Report for Ou-1 Soils, Revision 2

Dated on May 6, 2022

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 spatial intensity and spatial concentration/risk plots for Section 5 are not well suited to visualizing spatial patterns of contamination. These plots sort the results among a few bins (such as HI>1 and HI<1, <0.1 BCL, 0.1 BCL – BCL, and >BCL, etc.). The spatial quartile plots in Appendix F use four bins for detected values. This type of plotting works well for asbestos fibers, where the range of detected fibers in any sample is between zero and three. But for many analytes, a continuous measure of soil concentration or risk, such as with bubble plots or color-graded heat map, should be used because the bins don't provide enough resolution to see the actual magnitude of concentration differences." This comment was never properly addressed by the NERT in the response to comments (RTCs) submitted with Revision 2 dated on May 6, 2022.

The NDEP recognizes that the NERT has provided several plots, including bubble plots as requested in the above comment. However, the NERT did not interpret these to help the reader specifically with respect to a "hot spot" analysis. This is important given that there are risks greater than 10^{-5} and HIs greater than 1. Identification of hot spots is important from a risk standpoint especially when risks exceed de minimis levels so that appropriate risk management decisions can be made. For example, looking at Tables 6-4 and 11-1 and Figures 5-4 and F2-7; it could be concluded that targeted remediation in EU-7, would easily resolve the elevated risk due to CrVI. Other examples include dioxin and perchlorates. In this particular instance, it would be relatively easy to conduct targeted remediation to decrease the risk to below 10^{-5} and an HI of 1 or less should it be necessary. In those instances when subareas such as Exposure Units (EUs) are present, their demarcation on the concentration plots would also be beneficial to include.

The NDEP requests that the NERT consider this for all relevant, future deliverables.

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

Sincerely,

Dong Weiquan

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
Allan Delorme, Ramboll Environ
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 Environ
Christine Klimek, City of Henderson
Chuck Elmendorf, Stauffer Management Company, LLC
Dan Pastor, P.E. TetraTech
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 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
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