



November 9, 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 Rev
1 for Semi-Annual Groundwater Monitoring and GWETS Performance Sampling July
through December 2021*

Dated: October 24, 2022

Dear Mr. Steinberg,

The NDEP has received and reviewed the Trust's above-identified Deliverable and provides comments below. A revised Deliverable should be submitted by **01/10/2023** based on the comments. The Trust should additionally provide an annotated response-to-comments letter as part of the revised Deliverable.

NDEP's comment: 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.

NERT Response: Sample I-E-20210803 was diluted and re-analyzed because the nitrate result for the initial analysis exceeded the calibration range. However, due to the short holding time for nitrate (48 hours), the re-analysis was performed outside the holding time and was not reported in the laboratory report or DVSR. The result of the re-analysis was 32 mg/L, supporting the initial result of 29 mg/L. Because of this and the fact that either result would be considered estimated, the decision was made to retain the original result and not revise the laboratory report or DVSR. No changes have been made to the DVSR.

NDEP Response: Since the data reviewer is using professional judgement for choosing the first analysis over the dilution analysis, this explanation must be included in the DVSR.

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:

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