



October 20, 2023

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 Feasibility Study  
Work Plan for OU-1 and OU-2

Dated: October 3, 2023

Dear Mr. Steinberg,

The NDEP has received and reviewed the above-identified Deliverable and finds that the document is acceptable with the following comment noted for the Administrative Record:

1. Section 3.1.1 Olin, Stauffer, Syngenta, and Montrose Site – This section includes the following statements:

a. “It should be noted that an updated version of the OSSM Groundwater Remedial Alternative Study (RAS) is currently under NDEP review and, at NDEP’s request, NERT recently provided feedback on a specific section of the RAS related to OSSM’s dissolved phase contaminant plume as it affects the NERT site. Accordingly, the final version of the RAS which receives NDEP approval may affect the evaluation of the “OU- 1 Groundwater (OSSM Dissolved Plume)” remedial alternative as presented above.”

b. “In August of 2023, NDEP requested that OSSM submit a RAS for DNAPL both on and off-site of the OSSM site, and more specifically, that a proposed schedule for the DNAPL RAS be submitted to NDEP by November 1, 2023. While acknowledging the fact that the DNAPL is still migrating into OU-1 and that the DNAPL present in OU-1 represents an ongoing source to shallow groundwater in OU-1, OSSM’s response to the NDEP request and subsequent submittal of the DNAPL RAS will greatly inform NERT’s efforts related to the “OU-1 Groundwater (OSSM DNAPL)” remedial alternative.”

NDEP acknowledges that evaluation of NERT’s remedial alternatives may be influenced by the OSSM DNAPL RAS and/or the contingency language addendum to the OSSM groundwater RAS. Considering that the contingency language is currently in development

and the DNAPL RAS has not been received yet, NDEP may request modification of the Feasibility Study Work Plan for OU-1 and OU-2 based on the outcome of the contingency language and/or DNAPL RAS.

Please contact the undersigned with any questions at [wdong@ndep.nv.gov](mailto: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:AP

EC:

Frederick Perdomo, Deputy Administrator NDEP  
James Dotchin, NDEP BISC Las Vegas  
Alan Pineda, NDEP BISC Las Vegas  
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  
Christine Klimek, City of Henderson  
Chuck Elmendorf, Stauffer Management Company, LLC  
Claire Trombadore, EPA  
Dana Grady, P.E. TetraTech  
Dan Petersen, Ramboll  
Dane Grimshaw, Olin  
Daniel Chan, SNWA  
Darren Croteau, Terraphase Engineering, Inc.  
Dave Share, Olin  
Dave Johnson, LVVWD  
David Bohmann, TetraTech  
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  
Mike Hockley, President, Montrose Chemical Corporation of CA

Joe Leedy, Clean Water Team  
John Edgcomb, Edgcomb Law Group  
John-Paul Rossi, Stauffer Management Company LLC  
John Solvie, Clark County Water Quality  
Karen Gastineau, Broadbent & Associates  
Kathrine Callaway, Cap-AZ  
Kelly McIntosh, GEI Consultants  
Kelly Richardson, Latham & Watkins LLP  
Kirk Stowers, Broadbent & Associates  
Kirsten Lockhart, Neptune & Company Inc.  
Kim Kuwabara, Ramboll  
Kurt Fehling, The Fehling Group  
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  
Nathaniel Glynn, Latham & Watkins LLP  
Nicholas Pogoncheff, PES Environmental, Inc.9  
Orestes Morfin, CA  
Paul Black, Neptune & Company  
Peter Jacobson, Syngenta  
Ranajit Sahu, BRC  
Rebecca Sugarman, U.S. Environmental Protection Agency, Region 9  
Richard Pfarrer, TIMET  
Rick Kellogg, BRC  
R9LandSubmit@EPA.gov  
Roy Thun, GHD  
Spencer Lapiers, de maximus  
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  
Warren Turkett, Colorado River Commission  
William Frier, U.S. Environmental Protection Agency, Region 9  
Zeitel Sentz, de maximus