



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

Joe Lombardo, Governor
James A. Settelmeyer, Director
Jennifer Carr, Administrator

January 11, 2024

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 Property
NDEP Facility ID #H-000539
Nevada Division of Environmental Protection (NDEP) Response to: *Remedial Investigation Report for OU-1 and OU-2, Revision 1* and Associated Response to NDEP Comments

Dated: August 15, 2023

Dear Mr. Steinberg,

The NDEP has received and reviewed the Trust's above-identified Deliverable and provides comments in Attachment A. A revised Deliverable addressing the comments outlined in Attachment A should be submitted by February 29, 2024. The Trust should additionally provide an annotated response-to-comments letter as part of the revised Deliverable. Note that the comment in Attachment A is in addition to the comment previously provided on December 21, 2023. The revised Deliverable should address both comments.

Please contact the undersigned with any questions at alan.pineda@ndep.nv.gov or 702-668-3925.

Sincerely,

Alan Pineda, P.E.
Bureau of Industrial Site Cleanup
NDEP-Las Vegas City Office

EC:

Frederick Perdomo, Deputy Administrator NDEP
James Dotchin, NDEP BISC Las Vegas
Adam Schwartz, Central Arizona Project
Andrew Steinberg, Nevada Environmental Response Trust
Anna Springsteen, Neptune & Company Inc.
Ashley Green, Vice President, Montrose Chemical Corporation of CA
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
Christene 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
Danielle E. Greene, Colorado River Commission
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
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, Basic Remediation Company
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
Mike Hockley, President, Montrose Chemical Corporation of CA
Nathaniel Glynn, Latham & Watkins LLP
Nicholas Pogoncheff, PES Environmental, Inc.9
Orestes Morfin, CA
Paul Black, Neptune & Company
Peter Jacobson, Syngenta
Ranjit Sahu, Basic Remediation Company
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Spencer Lapiers, de maximis, inc.
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 maximis, inc.

Attachment A

1. Please re-insert the following paragraph into the main body of text in Section 4.1:

“In addition, while acknowledging that other sources are contributing contaminants to Las Vegas Wash and Lake Mead (such as the AMPAC site), any remedial action selected through issuance of the NERT ROD will mitigate only NERT’s contribution to the Las Vegas Wash and Lake Mead, and thus help achieve out-of-state MCLs at downstream state boundaries, namely, California’s MCL for perchlorate of 6 µg/L (California Code of Regulations [CCR] Title 22, Section 64431); California’s MCL for total chromium of 50 µg/L (CCR Title 22, Section 64431); other MCLs for COPCs originating at the Site (CCR Title 22, Division 4, Chapter 15 and Arizona Administrative Code Title 18, R-18-4-104, R-18-109).”