

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

June 4, 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 (Trust) Property NDEP Facility ID #H-000539 Nevada Division of Environmental Protection (NDEP) Response to: Data Validation Summary Report and Electronic Data Deliverable 2023 Annual Groundwater Monitoring and GWETS Performance Report

Dated: May 2, 2024

Dear Mr. Steinberg,

The NDEP has received and reviewed the Trust's above-identified Deliverable and provides comments in Attachment A. A revised Deliverable should be submitted by 06/30/2024 based on the comments found in Attachment A.

Please contact the undersigned with any questions at jdotchin@ndep.nv.gov or 702-668-3914.

Sincerely,

James (JD) Dotchin Chief Bureau of Industrial Site Cleanup NDEP-Las Vegas City Office

JD:JD

EC: Rick Perdomo, Deputy Administrator, NDEP, Carson City Alan Pineda, NDEP, BISC, Las Vegas Esther Franco, NDEP BISC Las Vegas Aaron Welch, Central Arizona Project 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 Candace Jantzen-Marson, WSP Carol Nagai, Metropolitan Water District of Southern California Chris Ritchie, Ramboll Christine Klimek, City of Henderson Christine Nelson, Central Arizona Project Chuck Elmendorf, Stauffer Management Company Chuck Frev, GHD Dana Grady, Tetra Tech Dan Petersen, Ramboll Dane Grimshaw, Olin Corporation Daniel Chan, Southern Nevada Water Authority Danielle E. Greene, Colorado River Commission of Nevada Darren Croteau, Terraphase Engineering Dave Share, Olin Corporation Dave Johnson, Las Vegas Valley Water District David Bohmann, Tetra Tech Dean Charles, de maximis, inc. Deena Hannoun, Southern Nevada Water Authority Ed Modiano, de maximis, inc. Elliot Min, Metropolitan Water District of Southern California Eric Fordham, GeoPentech Gary Carter, Endeavour LLC James M. Wright, Wyman Gordon Jay Johnson, Central Arizona Project Jeff Gibson, Endeavour LLC Jill Roberts, GEI Consultants Jill Teraoka, Metropolitan Water District of Southern California Joe Leedy, Clean Water Team John Edgcomb, Edgcomb Law Group John-Paul Rossi, Stauffer Management Company LLC John Solvie, Clean Water Team Karen Gastineau, Broadbent & Associates Kathrine Callaway, Central Arizona Project Kelly Richardson, Latham & Watkins LLP Kim Kuwabara, Ramboll Kirk Stowers, Broadbent & Associates Kirsten Lockhart, Neptune & Company Inc. Kurt Fehling, The Fehling Group Lee Farris, Basic Remediation Company Lisa Funderburg, Olin Corporation 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 Matt Trawick, U.S. Environmental Protection Agency, Region 9 Mauricio Santos, Metropolitan Water District of Southern California

Melanie Hanks, Olin Corporation Michael J. Bogle, Womble Carlyle Sandridge & Rice, LLP Michael Long, Hargis + Associates Mike Hockley, President, Montrose Chemical Corporation of CA Nicholas Pogoncheff, NV5 Nicole Bradley, de maximis, inc. Nicole Palazzolo, U.S. Environmental Protection Agency, Region 9 Orestes Morfin, Central Arizona Project Paul Black, Neptune & Company, Inc. Peter Jacobson, Syngenta Ranajit Sahu, Basic Remediation Company Rebecca Sugerman, U.S. Environmental Protection Agency, Region 9 Rick Kellogg, Basic Remediation Company Roy Thun, Broadbent & Associates Ryan Ramsey, Timet Ruth Beyer, Precision Castparts Corp. R9LandSubmit@EPA.gov Spencer Lapiers, de maximis inc. Steve Armann, U.S. Environmental Protection Agency, Region 9 Steve Clough, Nevada Environmental Response Trust Steven Anderson, Las Vegas Valley Water District Tanya O'Neill, Foley & Lardner LLP Todd Tietjen, Southern Nevada Water Authority Walter Nelson, WSP Warren Turkett, Colorado River Commission of Nevada Weiguan Dong, Southern Nevada Water Authority William Carson, Terraphase Engineering William Frier, U.S. Environmental Protection Agency, Region 9 Zeitel Senitz, de maximis inc.

Attachment A

DVSR Review:

File "NERT 2401 DVSR Rev 0.pdf"

 Section 2.1.3 – LCS/LCSD Samples; First paragraph, second sentence indicates that "nondetected" results are qualified as estimated, J+. This should be for "detected" results since the referenced results are detected above the MDL or PQL. Please make the correction as necessary.

EDD Review

File "NERT 2401 EDD Rev 0.accdb"

This EDD is acceptable.