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1. NERT's Remedial Investigation should be expanded to include areas to the southeast of the Site, known as the "BMI Common Areas." Henderson Legacy Conditions (HLC) are present in the BMI Common Areas due to migration of hazardous substances released at the Henderson Property prior to the Effective Date of the Trust.	NERT has initiated an evaluation of HLC in the BMI Common Areas to the east of the NERT site (also referred to as the Eastside Area). Results of this evaluation will be used to develop a work plan to evaluate the extent of HLCs in this area and the findings will be included in the forthcoming Remedial Investigation (RI) Report.
2. NERT should update the CSM to include areas to the southeast of the Site, known as the "BMI Common Areas." Inclusive with the current Study Areas, this will present a full conceptual understanding of all sources, contaminant migration pathways, and remaining contamination. NDEP suggests including the following items in the updated CSM: a. Incorporate all available data from other BMI companies including BRC, TIMET, AMPAC (Endeavor LLC) and OSSM so that an appropriate HLC CSM can be developed to meet the end of the RI process; b. Prepare at least three representative hydrogeological cross-sections at appropriate latitude and longitude direction crossing the entire HLC area respectively. The locations of the longitude cross-sections should include at least one through NERT core perchlorate plume, and two along west to east orientations. The locations of the latitude cross-sections should be at least one through the source region of the NERT core perchlorate plume, one approximately following Galleria Rd, one approximately following southern bank of the Las Vegas Wash. All cross-sections should be constructed based on all boring logs and follow the NDEP guidance on Hydrogeologic and lithologic Nomenclature Unification (January 6, 2009). Please justify if NERT has different hydrogeologic interpretation on the areas crossing property or study boundaries from neighbor companies; c. Prepare three-dimension geological block model showing alluvial deposits, transitional Upper Muddy Creek Formation, Upper Muddy Creek Formation or bedrocks; d. Prepare a unified paleochannel map that incorporates all interpretations from the other companies within BMI region; e. Prepare annual groundwater table elevation contour map that show groundwater flow direction arrows starting from major perchlorate sources starting from 2000;	NERT has initiated an evaluation of HLC in the BMI Common Areas to the east of the NERT site (also referred to as the Eastside Area). Results of this evaluation, as well as those from investigations at the NERT Site, the Off-Site NERT RI Study Area, and the Downgradient Study Area will be included in the forthcoming RI Report. Each of the items provided by NDEP in this comment will be evaluated during the RI and incorporated as appropriate into the preparation of the forthcoming RI Report.

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f. Prepare a map that shows/label historic sources and areas where soil has been removed. For reference, these features should be kept on other maps; g. Calculate groundwater velocity and traveling time starting from major perchlorate sources; h. Prepare and update map with historic (prior to excavation) and current soil concentration ranges at source areas; i. Prepare and update figure showing groundwater concentration contours for perchlorate over the entire HLC area to at least 20 ppb for pre-pump-treat and the year of 2002, 2006, 2012 and 2015. Include overlay for existing paleo-channel locations; j. Prepare three-dimension distribution of the contaminants (e.g., perchlorate, hexavalent chromium) in soils and groundwater sourced from the NERT site; k. Calculate contaminant mass in soil and groundwater showing detail parameters of contaminated groundwater saturated thickness, porosity, contaminated groundwater volume, contaminant concentration in groundwater for pre- pump-treat and for the years of 2002, 2006, 2012, 2015, add contaminated soil volume, contaminant concentration in contaminated soils pre- and post- soil excavation.	
3. Section 4.1 Summary of Soil Data Gap Investigation Results, Area 4 Area West of Mn-1 Pond, page 23. It was noted in Area 4 that high concentrations of perchlorate, chromium and chloroform were found in the groundwater in the area west of the Mn-1 pond. This section mentions that the Mn-1 pond will be decommissioned and that potential impacts to soils beneath the pond will be conducted. However, a time frame for the decommissioning and subsequent investigation is not given. NDEP desires a time frame and type of analysis for this pond decommissioning in the revised Deliverable.	NERT has discussed this matter with Tronox LLC. Currently Tronox has no immediate plans to close out this pond but fully intends to comply with the NDEP issued permits for the pond.
4. Specific Comment #2 Section 4.2 Identification of Soil COPCs, pages 25-26. This section identifies soil COPCs, and, there are several comments related to this section.	Please see the following individual responses to Comments 4a through 4d:
a. If a purpose of this Deliverable is to identify COPCs that may be impacting groundwater using the LBCLs for screening, the comparison to only the first 10 feet below ground surface	Although the Technical Memorandum included only a comparison of soil concentrations in the upper 10 feet bgs to LBCLs, a comparison to depths to 40 feet bgs has now been performed. By extending the

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(bgs) seems to limit the scope of the COPC identification process. In addition, as some samples were collected from excavated areas, decommissioned ponds, and basements, the limit of ten feet seems to be too arbitrary. NDEP finds that the revised Deliverable should include LBCLs for all chemicals down to groundwater.	depth to 40 feet bgs, the following additional soil COPCs were detected in at least 5% of samples and/or had at least one detection exceeding the LBCLs: • Bromide, uranium (total, reported in units of micrograms per liter per kilogram), 1,2-dichlorobenzene, tetrachloroethylene (PCE) and trichloroethylene (TCE). As shown in Table 5-1b of the Technical Memorandum, these constituents are already COPCs in groundwater. They will also be retained as COPCs in soil. A discussion of the comparison of COPC concentrations in soil to 40 feet bgs (approximately to the depth of groundwater) will be included in the forthcoming RI Report.
b. First paragraph states that comparison to human health based BCLs was not conducted, but this is contradictory to remaining sections of this document that make comparisons to industrial worker soil BCLs (for example, please see page 26). The rationale states that comparison to human health based BCLs were not done because the baseline human health risk assessment is in progress. NDEP finds that comparison to human health based soil BCLs should be conducted (similar to the work performed previously for the site).	An evaluation of COPCs in soil at concentrations above human health based BCLs will be provided in the forthcoming RI Report.
c. This section does not address the vapor inhalation pathway, NDEP finds that the revised should address the vapor inhalation pathway.	The Baseline Human Health Risk Assessment (BHRA) for On-site Soil, which is currently underway, will be evaluating the potential human health risks from the vapor inhalation pathway. A discussion of the results from the BHRA for the vapor inhalation pathway will be included in the forthcoming RI Report.
d. Comparisons to maximum detected "background" concentrations is not an appropriate way to eliminate COPCs. Especially, elimination of soil chemicals based on comparison to the maximum detected concentration is not advised. This comment also applies to Section 4.2.2 Metals in Soil (page 27). If metals are to be eliminated through a comparison to background, then an appropriate analysis should be conducted consistent with NDEP guidance.	Additional statistical analysis of background metals and Site metals concentrations will be conducted and provided in the forthcoming RI Report. (See also the response to Comment #5.)

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5. Specific Comment #3 Section 4.2.2 Metals in Soil, Second paragraph, footnote 6, page 27. Footnote cites two background data sets. The background data set used should apply to the NERT site (RZ-A background data set) and not the BMI Complex and Common Areas Vicinity.	This item will be addressed in the forthcoming RI Report. The primary background dataset used for comparison was the NDEP-approved background dataset from RZ-A (NDEP, 2010). The RZ-A background dataset has a maximum of 31 samples from depths down to 10 feet bgs. For some inorganics, (i.e., lithium, niobium, palladium and zirconium), there is no RZ-A background data. For these metals, comparisons were made to the BMI background dataset which has between 103 and 120 samples (depending on the specific analyte) collected from the regional area surrounding the Site to depths to 10 feet bgs (TIMET/BRC, 2007). It is important to note that the background datasets are limited to characterization within the quaternary alluvium in the upper ten feet of soil. The background datasets do not account for changes in background concentrations as a result of lithologic changes that may occur with depth. For example, it is likely that background metals concentrations for certain metals may be different in the Upper Muddy Creek formation in comparison to the alluvium. Additional statistical analyses will be performed in the RI that consider background concentrations as a function of depth/lithologic changes.
6. Specific Comment #4 Section 4.2.4 Radionuclides in Soil, page 28. It does not appear that secular equilibrium was evaluated for the radionuclides detected in soil. In addition, the comparisons to LBCLs were limited to the top 10 feet of soil. Radionuclides should be addressed via an NDEP approved background comparison method and an analysis of secular equilibrium	This item will be addressed in the forthcoming RI Report. Secular equilibrium for radionuclides in the top 10 feet of soil at the Site has been previously evaluated by Ramboll Environ (2015, 2016). It is important to note as identified in NDEP guidance (NDEP 2009), issues have previously been identified in the radionuclide analytical datasets for soil samples collected across the BMI Complex. Specifically, radionuclides in the same decay series have both passed and failed background comparisons. This finding was unexpected given that radionuclides in the same decay series should yield similar background comparison results under the assumption of secular equilibrium. Using datasets provided by three companies within the BMI Complex, NDEP's consultants evaluated specific issues associated with the datasets and identified patterns in the data. Exploratory data analysis (EDA) indicated that sample preparation and analytical methods were important factors in

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	explaining some of the data anomalies. Other NDEP observations included the lack of correlation with Ra-228 in the Th-232 decay series. Specific recommendations were provided based on the EDA. These recommendations will be considered in the upcoming analysis of radionuclides during the RI. In addition, as discussed in the response to Comment #4 above, all soil samples from RZ-A (the background dataset) were collected within the quaternary alluvium in the top ten feet of soil, and the background datasets do not account for changes in background concentrations as a result of lithologic changes that may occur with depth. With regards to radionuclides at depths greater than 10 feet, additional statistical analyses will be performed in the RI to consider the variability in background concentrations as a function of depth/lithologic changes.
7. Specific Comment #5. Section 5.2 On-Site Groundwater, page 32. Chloroform was identified as a COPC in soil. The statement that chloroform is only a "trespassing" VOC has not been adequately justified. It is recommended that the "trespassing" term either be removed or qualified such as "contribution of chloroform may be as a trespassing COPC".	Comment noted.
8. Specific Comment #6. Section 5.2 On-Site Groundwater, Chromium, page 33. Hexavalent chromium has been detected in soil and groundwater at the site. The current section only appears to discuss chromium; presumably as total chromium. Please summarize the available data for hexavalent chromium in this section of the report.	An evaluation of available hexavalent chromium data will be provided in the forthcoming RI Report.
9. Specific Comment #7. Section 5.2.3 Further Investigation of Trespassing Chemicals from Neighboring Properties, page 34. As noted above, chloroform was identified as a COPC in soil and should not be solely considered a "trespassing" VOC (see Specific Comment #7 above).	Comment noted.
10. Specific Comment #8. Section 5.3.3 Further Investigation of Chloroform in the Downgradient Plume, pages 39-40. Please include a discussion of the corresponding preliminary risk if the 10-15 foot bgs soil gas data were used versus the 5-foot depth interval?	This item will be addressed in the forthcoming RI Report. As a preliminary and conservative estimate, the chloroform risk-based target concentration (RBTC) of 168 µg/m^3 derived for the 5-foot depth interval is used to estimate the cancer risks based on the

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	results of the 10 to 15 foot soil gas samples. The estimated risks range from 4×10^{-5} to 5×10^{-5}, slightly higher than the risks estimated using the 5 foot depth samples (i.e., 2×10^{-5} to 3×10^{-5}). The risk estimates based on the deeper samples are over estimated because an RBTC derived for 10 to 15 foot samples would be higher than the RBTC derived for 5 foot samples. Refined risk estimates for the down gradient plume area, in which area-specific soil properties are incorporated into the models and sample depth is taken into account in the analysis, will be included in the forthcoming RI or BHRA reports.
11. Specific Comment #9. Section 6.2 Identification of Additional Data Gaps, pages 42-43. NERT may consider that chromium and hexavalent chromium along with perchlorate because they generally share same source.	As part of the RI Phase 2 investigation work plan, NERT has proposed testing soil and groundwater from on-site and off-site soil borings and monitoring wells for total chromium and hexavalent chromium, as summarized in Tables 7-1, 7-2, 7-3a, and 7-3b of the Technical Memorandum. An evaluation of these data will be provided in the forthcoming RI Report.
12. Specific Comment #10. Section 7 Phase 2 RI Data Gap Investigation, page 44. Is it possible for additional work to be conducted in the Mn-1 pond? Also, it is noted that chromium will be analyzed for in soil, but what about hexavalent chromium in groundwater and soil? Are there plans to collect additional soil gas for the vapor inhalation pathway especially around the unit buildings?	Please refer to the response to Comment #3 for information pertaining to planned work to evaluate potential impacts to the subsurface from former operation of the Mn-1 pond. Please refer to the response to Comment #11 for information pertaining to the analytical testing of soil and groundwater for total chromium and hexavalent chromium. There are currently no plans to collect soil gas samples at the site, including the vicinity of the unit buildings. The need for additional soil gas samples at the site will be evaluated following receipt of additional soil and groundwater data from the upcoming RI Phase 2 Investigation and the in-progress Unit Building Investigation.
13. Specific Comment #11 Figure 3-1a and 3-1b. There are many wells located between TR- 1/TR-2, the MW5A cluster to SA21 cross sectional segment and SA21 to SA25 cross sectional segment (see figure below from Regional GW Database). If boring logs from wells in close proximity to the investigator 's cross-sectional line have not been taken into consideration, should the investigators acknowledge their existence and provide justification I rationale for taking into account? This is important since other companies' have depicted cross-sections along similar	One purpose of the forthcoming RI Report will be to integrate, to the extent feasible, previous interpretations of subsurface stratigraphy by different investigators. Figure 3-1a in the Technical Memorandum represents a conceptual interpretation of stratigraphy at the NERT site that had been developed by Kerr McGee and Tronox's consultants, updated with more recent groundwater elevations and chemical data. As noted in the response to comment 14, Figure 3-1a will be revised to incorporate new data developed during the RI Phase 2 investigation as appropriate and included in

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alignment which use different wells and with different interpretation of subsurface conditions - specifically speaking Figures 2-1 and 2-2 of OSSM's GW RAS (Geosyntec 2014); note Figure 2-1 provided below as a reference attachment.	the forthcoming RI Report.
14. Specific Comment #12 Figure 3-Ia between TR-1/TR-2. The MW5A cluster to SA21 along the cross section alignment appears to be located within the area commonly referred to as the "Muddy Creek High". Based upon the subsurface depiction on Figure 3-1a this does not appear to be depicted by NERT investigators. Suggest that this be addressed in a revised document or future comprehensive version of RI Report.	Data pertaining to the hydrogeology in the vicinity of the "Muddy Creek High" will be evaluated along with new data obtained during the RI Phase 2 investigation. Subsurface cross-sections will be revised as appropriate and included in the forthcoming RI Report.
15. Specific Comment # 13 Section 4.1 Summary of Soil Data Gap Investigation Results, Area 3 Debris Pile, page 22. Previous area discussions included a description of the types of analyses that were conducted for the samples collected. It would be helpful to include this in each area discussion to assist the reader in understanding what chemical and/or physical analyses were conducted for the media sampled.	Discussion of investigation areas including a description of the types of analyses performed will be included in the forthcoming RI Report.
16. Specific Comment #14 Section 4.1 Summary of Soil Data Gap Investigation Results, Area 8 Investigation Near Unit Buildings and Leach Plant, Monitoring Well Pilot Borings Near Unit Buildings, page 24. Similar to the previous comment, it would be helpful to include the chemical and/or physical analyses that were conducted for the media sampled.	Discussion of investigation areas including a description of the types of analyses performed will be included in the forthcoming RI Report.
17. Specific Comment #15 Section 2.1.6 Historical Wastewater and Storm Water Disposal Practices, p. 9, first two paragraphs. Based upon review of Figure 2-3 and the referenced text does not address the green colored-coded historical ditch segment annotated with a question mark.	The following additional information regarding the green color-coded ditch segment will be included in the forthcoming RI Report. The green color-coded historical ditch segment shown in Figure 2-3 in the Technical Memorandum is not well-documented and may represent a subgrade pipe, rather than a ditch. Based on aerial photograph interpretation, by 1950, effluent from the acid drain system and storm drain system may have been segregated from one another such that flows from the western storm drain system were routed under the acid drain effluent stream through a subsurface pipe. Effluent from the storm drain system on the western and eastern ends of the Beta Ditch may have then been routed to Trade Effluent Pond T6 through an undocumented

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	drainage located north of the Beta ditch. It also appears that by 1950 a new direct connection between the Site's acid drain outfall and the siphon pond allowed process effluent to flow to the Upper BMI Ponds through a subsurface siphon pipe located immediately east of the former Trade Effluent Ponds. Any additional information obtained during the Phase 2 RI will be incorporated in the forthcoming RI Report.
18. Specific Comment #16 Section 2.3.2, p. 13, first full paragraph, last sentence. It is recommended that the Deliverable be revised to include additional details regarding this statement for clarity. As stated, no conclusion can be drawn regarding whether the data gap has been resolved and within the context of a RI report this is important. A footnote reference additional documentation maybe all that is necessary.	It is assumed that the term "data gap" in this comment is meant to refer to the potential "capture gaps" identified near the AWF and the subsequent installation of extraction wells at ART-7B and PC-150 as part of the 2013 GWETS Optimization Project. The forthcoming RI Report will include a reference to the 2013 GWETS Optimization Report and the most recent Annual or Semi-Annual Remedial Performance Report for Chromium and Perchlorate, where the status of these potential capture gaps are discussed.
19. Specific Comment #17 Section 3.2.2 Local Geology, Transitional (or reworked Muddy Creek Formation) subsection, p. 16. Although the investigator's preface the paragraph with the conditional statement "where present", it should be noted that it appears as though none of the cross-sections depict the presence of the transitional MCF, however, investigator's on both sides of the NERT plant site have acknowledged and logged the xMCF. Suggest the investigators clarify their interpretation of subsurface conditions.	Additional evaluation of subsurface geologic data, including the potential presence of the transitional Muddy Creek Formation beneath the NERT site and adjacent properties, will be performed as part of the RI and the results of the evaluation will be provided in the forthcoming RI Report.
20. Specific Comment #18. Section 3.2.3, p. 20, Middle WBZ (UMCf-fg1) subsection, p. 20. The following subsection "UMCf-cf2" is detailed yet the report is silent as regards treatment of this unit within the context of the numerical model and remedial alternative process. Suggest additional rationale be presented as to reasons for inclusion of one unit and not the other.	Additional evaluation of subsurface geologic data and the treatment of the UMCf-cg2 within the context of the numerical model and remedial alternatives evaluation will be performed as part of the RI, and the results of the evaluation will be provided in the forthcoming RI Report.
21. Specific Comment #19 Section 3.3 Surface Water, p. 20, third paragraph, third sentence states, "The former Beta Ditch Extension and associated volatile organic compound (VOC) and chloroform-impacted soils were excavated in 2010." VOCs were not the only compounds exceeding screening threshold (i.e. drivers for removal of the Beta Ditch). The Deliverable should be revised for consistency with the record.	We agree with this comment and a revised discussion regarding the removal of the Beta Ditch will be incorporated into the forthcoming RI Report.

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22. Section 2.1.6 Historical Wastewater and Storm Disposal Practices, p.9, third paragraph states, "Montrose Chemical Corporation (Montrose), a manufacturer of chlorinated benzenes, hydrochloric acid, chloroethane, pesticides, and polychlorinated biphenyls (PCBs), discharged wastewater to the Beta Ditch that contained sulfuric acid (possibly with trace DDT), hydrochloric acid containing various PCBs....." The Deliverable should include reference(s) to the technical reports or data which substantiate this statement.	Citations for these statements will be added to the forthcoming RI Report. Supporting information for the quoted statement can be found in Geraghty & Miller, Inc. (1993) and Weston (1993).
23. Section 6.1 Key Findings of the RI Data Gap Investigation, page 42 and Off-Site NERT RI Study Area, page 43. NERT may consider that the chlorinated benzene isomers can be useful tracer chemicals.	The use of chlorinated benzene isomers as tracer chemicals will be evaluated during the RI.
24. NDEP suggests adding a table showing annual production of perchlorate related compound, annual perchlorate produced and annual perchlorate wasted for the period starting and ending production for Kerr-McGee/Tronox.	The forthcoming RI Report will include tables showing annual production of the following products produced at the Site, as provided in Kleinfelder 1993: • Sodium chlorate (1951-1990) • Potassium chlorate (1951-1975) • Tumbleleaf production, a sodium chlorate product (1975-1985) • Sodium perchlorate (1968-1990) • Potassium perchlorate (1951-1983) • Magnesium perchlorate (1969-1976) • Ammonium perchlorate (1951-1990) The amount of waste material produced is difficult to ascertain because much of the process waste was disposed in solution via the Site's ditch system in unknown quantities. The forthcoming RI Report will include available additional annual process waste information.
25. Appendix D Subsurface Cross Sections, Plates D-1b, -2b, -3b, -4b, -5b, -6b, -7b, -8b, -9b, - 10b, 11b were reviewed for definition of the perchlorate plume and located on Figures 7-3a and 7-3b for comparison to planned additional wells. For future reference it would facilitate review to post the cross section lines	The cross section lines will be posted on the relevant perchlorate plume maps in the forthcoming RI Report. Cross Section D. A deeper well will be added near well M-14A, as suggested. Cross Section F. As shown on Figure 7-1a in the Technical

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on a map such as Figure 7-3b. a. Cross Section D - bounding perchlorate plume would be improved by adding a deep well in the vicinity of well M-14A. b. Cross Section F - bounding perchlorate plume would be improved by adding several deep shallow zone wells one each to the east and west of well cluster M-100, -151, and -155. c. Cross Section H - has one deeper well planned and a second deeper well east of PC- 179 is recommended. d. Cross Section I - bounding perchlorate plume would be improved by adding two deeper wells into the Muddy Creek formation. e. Cross Section J - bounding perchlorate plume would be improved by adding two deeper wells one to east side and the other west of planned deeper well PC-176 (proximal to PC-130). f. Cross Section K - bounding perchlorate plume would be improved by adding two deeper wells near MW-K4 and ARP-2A. g. Cross Section L - this longitudinal section highlights the need for more vertical plume definition as discussed above.	Memorandum, seven new deeper shallow zone wells (M-204 thru M-208, M-211, and M-214) are planned along the cross section line at intervals of approximately 300 feet. Planned well M-208 is located adjacent to the M-100,-151, and -155 cluster. Two additional deeper shallow WBZ zone wells are planned at this location, and two deeper wells are planned adjacent to existing well M-101 located 300 feet east. The need for more closely spaced deep shallow zone wells will be evaluated after the planned wells have been installed and sampled. Cross Section H. A second deeper well will be added east of PC-179 at boring location PCDB-8. Cross Section I. Access is difficult along Cross Section I due to subsurface utility lines beneath the streets. As an alternative, a deeper well extending into the Muddy Creek Formation will be added adjacent to planned shallow well PC-163, located between Cross Sections I and J along the centerline of the offsite perchlorate plume. Cross Section J. Planned well PC-176 is located approximately 100 feet northeast of well PC-130 and serves the purpose of a deeper well proximal to PC-130. Planned well PC-177 is located approximately 500 feet north of PC-127 and serves the purpose of a deeper well to the east of the PC-176/PC-130 location. A third deeper well will be added to the west at a location adjacent to PC-131. Cross Section K. To address this comment, two deeper wells will be added adjacent to planned soil borings PCDB-4 (near MW-K4) and PCDB-5 (near ARP-6B). In addition, a new deeper well will be added near ARP-2A. Cross Section L. This comment will be addressed by the additional planned wells discussed above.

References:

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NDEP, 2010. NDEP Response to Background Issues and Determination of Background Dataset for TRX, August 17.

Ramboll Environ US Corporation (Ramboll Environ), 2015. Interim Report, Preliminary Selection of Facility Area COPCs, Nevada Environmental Response Trust Site, Henderson, Nevada, May.

Ramboll Environ, 2016. Identification of COPCs and Exposure Units for Soils, Nevada Environmental Response Trust Site, Henderson, Nevada, August.

TIMET/BRC, 2007. Background Shallow Soil Summary Report, BMI Complex and Common Areas Vicinity.

Weston, 1993. Phase I Environmental Conditions Assessment Report, Pioneer Chlor Alkali Company, Inc., Stauffer Chemical Company Site, March 22.