



September 8, 2021

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:
Baseline Health Risk Assessment for OU-2 Soil Gas and Groundwater
Dated: July 23, 2021

Dear Mr. Steinberg,

The NDEP has received and is reviewing the Trust's above-identified Deliverable.

The NDEP understands that the calculated excess lifetime cancer risk for the residential vapor intrusion scenario in the Baseline Health Risk Assessment (BHRA) did not exceed 2×10^{-5} for soil gas or groundwater. The excess lifetime cancer risk calculations for vapor intrusion are within the United States Environmental Protection Agency's (US EPA) acceptable risk range of 10^{-6} to 10^{-4} . The risk driver for the soil gas samples in Operable Unit 2 (OU-2) was identified to be chloroform, contributing to over 97% of the total increased risk for the location.

All data collected and evaluated to date has continued to show that all of the evaluated receptors including the residential vapor intrusion pathway are below long-term health-based thresholds in OU-2.


The Johnson and Ettinger (J&E) Model (2017) with the site-specific input data was used to estimate the range of potential indoor air impacts and associated human health risks of OU-2 BHRA area. As all models carry some degree of uncertainty and out of the abundance of caution the NDEP and the US EPA Region 9 request that NERT prepare a modification to the Work Plan to complete a targeted indoor air investigation to confirm that chloroform indoor air levels remain below long-term health-based thresholds and to allow direct comparisons between modeled indoor air estimates and direct indoor air measurements. This investigation should focus on areas with elevated groundwater and soil gas concentrations in the Eastern portion of the Pittman residential area in Henderson, NV.

The US EPA Region 9 has provided the attached September 11, 2020 letter to provide additional justification for the requested indoor air investigation.

The agencies (NDEP and US EPA Region 9) will require this additional line of evidence for NERT to complete the Baseline Health Risk Assessment for Operable Unit 2.

Please prepare and submit the requested OU-2 BHRA Work Plan modification by September 30, 2021.

Sincerely,



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

JD:jd

Attachment: September 11, 2020 US EPA Region 9 Letter

EC:

Jeffrey Kinder, Deputy Administrator NDEP
Frederick Perdomo, Deputy Administrator NDEP
James Dotchin, NDEP BISC Las Vegas
Carlton Parker, NDEP BISC Las Vegas
Samantha Thompson, PIO, DCNR
Allan Delorme, Ramboll Environ
Andrew Barnes, Geosyntec
Andrew Steinberg, Nevada Environmental Response Trust
Anna Springsteen, Neptune & Company Inc.
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Carol Nagai, MWDH2O
Carrie Hunt, Olin Corporation
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Christine Klimek, City of Henderson
Chuck Elmendorf, Stauffer Management Company, LLC
Dan Pastor, P.E. TetraTech
Dave Share, Olin
Dave Johnson, LVVWD
David Parker, Central Arizona Water Conservation District
Derek Amidon, Tetrattech
Ebrahim Juma, Clean Water Team
Ed Modiano, de maximis, inc.
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Kelly McIntosh, GEI Consultants
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Kirsten Lockhart, Neptune & Company Inc.
Kim Kuwabara, Ramboll Environ
Kurt Fehling, The Fehling Group
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