



February 19, 2026

Andrew 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: *ECA*
Characterization Work Plan

Dated: October 3, 2025

Dear Mr. Steinberg,

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

1. In an email dated February 11, 2026, NDEP and EPA provided additional sample locations to supplement PCB/dioxin data at the site, NERT agreed to the added locations in an email dated February 17, 2026.
 - a. Three locations within excavation control area (ECA) B2, one location within ECA B4, and one location to the south of Unit 5 in ECA B1.
 - b. Two additional locations within each ECA D1 polygon, resulting in a total of four sample locations distributed around the perimeter of each of the ECA D1 areas shown in Figure 4-22.
2. PCB sampling will follow The [EPA TSCA PCBs Laboratory Methods Fact Sheet](#) which covers extraction and analytical methods for PCBs required in the 2023 amended Toxic Substances Control, TSCA, PCB regulations.
3. As with any sampling program, discovery of areas with COPC concentrations that could impact groundwater or receptors not specified in the work plan may require further investigation following the ECA Characterization Report.

Please contact the undersigned with any questions at cschoop@ndep.nv.gov or 702-668-3926.

Sincerely,



Chad Schoop, P.E.
Bureau of Industrial Site Cleanup
NDEP-Las Vegas Office

cc: Rick Perdomo, Deputy Administrator, NDEP, Carson City
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