

STATE OF NEVADA

Department of Conservation & Natural Resources
DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor

Leo M. Drozdoff, P.E., Director

Colleen Cripps, Ph.D., Administrator

October 10, 2011


Jay A. Steinberg
Nevada Environmental Response Trust
35 East Wacker Drive, Suite 1550
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:
Annual Remedial Performance Report for Chromium and Perchlorate, Nevada
Environmental Response Trust Site; Henderson, Nevada, July 2010 – June 2011,
Appendix C: Data Validation Summary Report (DVSR)
Dated: August 26, 2011

Dear Mr. Steinberg,

The NDEP has received and reviewed the Trust's DVSR for the above-identified Deliverable and provides comments in Attachment A. A revised Deliverable should be submitted by **November 10, 2011** based on the comments found in Attachment A. The Trust should additionally provide an annotated response-to-comments letter as part of the revised Deliverable. Please contact the undersigned with any questions at sharbour@ndep.nv.gov or 775-687-9332.

Sincerely,



Shannon Harbour, P.E.
Staff Engineer III
Bureau of Corrective Actions
Special Projects Branch
NDEP-Carson City Office
Fax: 775-687-8335

SH:sh

EC: Jim Najima, Bureau of Corrective Actions, NDEP
Greg Lovato, Bureau of Corrective Actions, NDEP
William Knight, Bureau of Corrective Actions, NDEP
Carolyn Tanner, AG's Office
Brenda Pohlmann, City of Henderson
Stephen Tyahla, U.S. Environmental Protection Agency, Region 9
Charles K. Hauser, Esq., Southern Nevada Water Authority



Ron Zegers, Southern Nevada Water Authority
Peggy Reofer, Southern Nevada Water Authority
Marcia Scully, Metropolitan Water District of Southern California
Mickey Chaudhuri, Metropolitan Water District of Southern California
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Andrew Steinberg, Nevada Environmental Response Trust
Tanya O'Neill, Foley & Lardner LLP
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Mike Skromyda, Tronox LLC
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Mark Paris, Landwell
Craig Wilkinson, TIMET
Kirk Stowers, Broadbent & Associates
Victoria Tyson, Tyson Contracting
George Crouse, Syngenta Crop Protection, Inc.
Nick Pogoncheff, PES Environmental
Lee Erickson, Stauffer Management Company
Michael Bellotti, Olin Corporation
Curt Richards, Olin Corporation
Paul Sundberg, Montrose Chemical Corporation
Joe Kelly, Montrose Chemical Corporation of CA
Jeff Gibson, AMPAC
Larry Cummings, AMPAC
Ebrahim Juma , Clean Water Team
Joe Leedy, Clean Water Team
Kathryn Hoffmann, Clean Water Team
Dave Gratson, Neptune and Company, Inc.

CC: Lee Farris, BRC, 875 W. Warm Springs Road, Henderson, NV 89011
Lee Erickson, Stauffer Management Company

Attachment A

DVSR Comments:

1. The validation of the total chromium results, using methods 6010 and 200.7, resulted in the censoring of 8 samples due to blank contamination. The censoring of data due to blank issues is inconsistent with the July 18, 2011 Guidance on Qualifying Data Due to Blank Contamination. This may be due to an overlap between when the data was validated and when the Guidance was issued. Please revise the DVSR using the referenced guidance.

EDD Comments:

1. Please move the filter_flag to the Results table. This is necessary for this and futures EDDs since samples were analyzed both filtered and unfiltered. It is noted that the sample IDs have been adjusted in this report to identify those filtered and unfiltered (e.g. 2VD2911_02/09/11-F versus 2VD2911_02/09/11-T).
2. There appears to be a typographical error. Location_id CDL1-R in the Samples table is listed as CLD-1R in the Locations table. Please revise.
3. Please provide the dvsr-id for the following two identified records in the Samples table where dvsr_id is null: M-48A and PC-21A.
4. There are 1126 records in Samples table where Litho field is NULL but Matrix field is WG. (Please see Tab “#1 Litho NULL for SO,WG” in the attached spreadsheet– electronic attachment.) Please revise as necessary.
5. There are 459 records in Results table where Prep_date and prep_time is NULL. (Please see Tab “#2 prep_date NULL” of the attached spreadsheet.) It is understood that some of these analyses have no preparation (e.g pH). However, if a preparation step is required, the laboratory should provide that information in the report and this should be incorporated into the EDD. Please revise as necessary.
6. Field result_unit in the Results table should be result_units (add the s at the end). Please revise.
7. Field name subarea in the Locations table should be named sub_area. Please revise.
8. There are 246 rows where subarea in Locations table is NULL. (Please see Tab “#3 subarea NULL” of the attached spreadsheet.) Please revise as necessary and clarify whether there are subarea designations available for these locations.
9. There are 1124 rows where hydro in Locations table is NULL and matrix is WG. (Please see Tab “#4 hydro null for WG” of the attached spreadsheet.) Please revise as necessary.