

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

February 21, 2013

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: Data Validation Summary Report Additional Pre-Confirmation Sampling Nevada Environmental Response Trust Site, Henderson, Nevada

Dated: April 11, 2011

Dear Mr. Steinberg,

The NDEP has received and reviewed the Trust's above-identified Deliverable and finds that the document is acceptable. However, the comments provided in Attachment A are regarding the EDD and should be addressed with a revised EDD submitted by March 21, 2013. Please include an annotated response to comments in response to Attachment A with the revised EDD submittal.

Please contact the undersigned with any questions at wdong@ndep.nv.gov or 702-486-2850 x252.

Sincerely,

Weiquan Dong, P.E. Special Projects Branch

Jong Us

Bureau of Corrective Actions

NDEP-Las Vegas City Office

WD:sh

EC: Greg Lovato, Bureau of Corrective Actions, NDEP Shannon Harbour, NDEP Adam Baas, Edgcomb Law Group Allan Delorme, ENVIRON

Andrew Barnes, Geosyntec

Andrew Steinberg, Nevada Environmental Response Trust

Ashley Katri, McGinley & Associates



Brenda Pohlmann, City of Henderson

Brian Rakvica, McGinley & Associates

Brian Spiller, Stauffer Management Company, LLC

Brian Waggle, Hargis + Associates

Carolyn Tanner, AG's Office

Cassandra Joseph, AG's Office

Charles K. Hauser, Esq., Southern Nevada Water Authority

Chuck Elmendorf, Stauffer Management Company, LLC

David Hadzinsky, TIMET-HSEA Dept.

Ebrahim Juma, Clean Water Team

Ed Modiano, de maximis, inc.

Eric Fordham, Geopentech

George Crouse, Syngenta Crop Protection, Inc.

Jay Gear, Olin Co

Jeff Gibson, AMPAC

Jesus Gastelum Perez, Central Arizona Project

Joanne Otani

Joe Kelly, Montrose Chemical Corporation of CA

Joe Leedy, Clean Water Team

John Pekala, Environcorp

John R. McNeill, Central Arizona Water Conservation District

Kirk Stowers, Broadbent & Associates

Kurt Fehling, The Fehling Group

Kyle Gadleym, Geosyntec

Lee Farris, BRC

Marcia Scully, Metropolitan Water District of Southern California

Mark Paris, Landwell

Mark Travers, ENVIRON

Michael Long, Hargis + Associates

Mickey Chaudhuri, Metropolitan Water District of Southern California

Mike Balshi, Neptune and Company, Inc.

Nicholas Pogoncheff, PES Environmental, Inc.

Paul Black, Neptune and Company, Inc.

Paul Hackenberry, Hackenberry Associates, LLC

Peggy Roefer, Southern Nevada Water Authority

Ranajit Sahu, BRC

Rebecca Shircliff, Neptune and Company, Inc.

Rick Kellogg, BRC

Ron Zegers, Southern Nevada Water Authority

Scott Bryan, Central Arizona Project

Stephen Tyahla, U.S. Environmental Protection Agency, Region 9

Tanya O'Neill, Foley & Lardner LLP

Teri Copeland

Victoria Tyson, TIMET

Attachment A

- 1. The "Resullts" Table should be named Results Table (extra '1').
- 2. There are duplicate Sample ID values in the "sample_id_field" in the Samples Table. This field value must be unique.
- 3. There are duplicate Location ID values in the Locations. This field value must be unique.
- 4. The currently named "preparation _date" and "preparation _time" fields should be named Prep_date and Prep_time in the Results Table. (Note the fields currently provided have a space before the underscore.)
- 5. There are 101 records in Results Table where detect_flag_fod='T' but all have the UJ qualifier. If the records are qualified with a U, UJ, or R, then the detect_flag_fod should not be equal to "T."
- 6. There are 2870 records in Results Table where PQL=NULL and the analytical_suite field is equal to SVOCs, VOCs, and OCPESTs. A PQL should be provided for these analyses.
- 7. The Validated_flag in Results Table should be named validation_flag.