



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

April 29, 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 January to June 2012 Annual Remedial Performance Sampling, NERT*

Dated: July 24, 2012

Dear Mr. Steinberg,

The NDEP has received and reviewed the Trust's above-identified Deliverable and provides comments in Attachment A. A revised Deliverable should be submitted **by 05/30/2013** 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 wdong@ndep.nv.gov or 702-486-2850 x252.

Sincerely,

Weiquan Dong, P.E.
Special Projects Branch
Bureau of Corrective Actions
NDEP-Las Vegas City Office

WD:JD

EC: Greg Lovato, Bureau of Corrective Actions, NDEP
Shannon Harbour, NDEP, BCA Carson City
James Dotchin, NDEP, BCA LV
Adam Baas, Edgcomb Law Group
Allan Delorme, ENVIRON
Andrew Barnes, Geosyntec



Andrew Steinberg, Nevada Environmental Response Trust
Ashley Katri, McGinley & Associates
Betty Kuo, MWDH2O
Brenda Pohlmann, City of Henderson
Brian Rakvica, McGinley & Associates
Brian Spiller, Stauffer Management Company, LLC
Brian Waggle, Hargis + Associates
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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
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Joanne Otani
Joe Kelly, Montrose Chemical Corporation of CA
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John Pekala, Environcorp
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Kirk Stowers, Broadbent & Associates
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Kyle Gadley, Geosyntec
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Mark Paris, Landwell
Mark Travers, ENVIRON
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Michael Long, Hargis + Associates
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Rebecca Shireliff, Neptune and Company, Inc.
Rex Heppe, Ninyo and Moore
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. Sample_top_depth and sample_bottom_depth must be populated for all “WG” matrix samples.
2. The litho field in the samples table needs to be populated for six “WG” matrix samples.
3. There are 422 records where validation_flag is NULL. This field must be populated with T (true) or F (false). T indicates the value was validated after the laboratory reported the value. The analytes that were not validated in this EDD should equal F.
4. The northing and easting fields need to be populated for location_id “SF-1.”
5. The hydro field in the samples table must be populated for six “WG” matrix samples.
6. For 49 records, result_reported is NULL and the detect_flag_fod = ‘U’. For non-radionuclide non-detected results, the result_reported should equal the SQL, unless the value has been censored to a higher level because of mitigating factors (in this case, the reason for raising the reported value above the SQL should be very apparent from the final validation qualifier, reason code, and validation reason).
7. There are 23 records where analyte_name = ‘Total Dissolved Solids’ and the SQL is NULL. There are many other TDS results with the SQL reported. The SQL needs to be populated for these records.