



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

**STATE OF NEVADA**  
Department of Conservation & Natural Resources

Brian Sandoval, Governor  
Leo M. Drozdoff, P.E., Director  
David Emme, Administrator

December 4, 2015

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 and EDD, July 2014 through June 2015 Annual Remedial Performance  
Sampling, Nevada Environmental Response Trust (NERT), Henderson, Nevada*

Dated: September 9, 2015

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 **02/04/2016** 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](mailto:wdong@ndep.nv.gov) or 702-486-2850 x252.

Sincerely,

Weiquan Dong, P.E.  
Bureau of Industrial Site Clean-Up  
NDEP-Las Vegas City Office

WD:jcp

EC:

James Dotchin, NDEP BISC Las Vegas  
J. Carlton Parker, NDEP BISC Las Vegas  
Adam Baas, Edgcomb Law Group  
Allan Delorme, Ramboll Environ  
Alison Fong, U.S. Environmental Protection Agency, Region 9  
Andrew Barnes, Geosyntec  
Andrew Steinberg, Nevada Environmental Response Trust

Betty Kuo Brinton, MWDH2O  
Brenda Pohlmann, City of Henderson  
Brian Waggle, Hargis + Associates  
Carol Nagai, MWDH2O  
Charles K. Hauser, Esq., Southern Nevada Water Authority  
Chris Ritchie, Ramboll Environ  
Chuck Elmendorf, Stauffer Management Company, LLC  
Dave Share, Olin  
David Johnson, Central Arizona Water Conservation District  
Dave Johnson, LVVWD  
Derek Amidon, Tetrattech  
Ebrahim Juma, Clean Water Team  
Ed Modiano, de maximis, inc.  
Eric Fordham, Geopentech  
Frank Johns, Tetrattech  
George Crouse, Syngenta Crop Protection, Inc.  
Jasmine Mehta, AG Office  
Jay Steinberg, Nevada Environmental Response Trust  
Jeff Gibson, AMPAC  
Jill Teraoka, MWDH2O  
Joanne Otani  
Joe Kelly, Montrose Chemical Corporation of CA  
Joe Leedy, Clean Water Team  
John Pekala, Ramboll Environ  
Katherine Baylor, U.S. Environmental Protection Agency, Region 9  
Kelly McIntosh, GEI Consultants  
Kevin Fisher, LV Valley Water District  
Kirk Stowers, Broadbent & Associates  
Kim Kuwabara, Environcorp  
Kurt Fehling, The Fehling Group  
Kyle Gadley, Geosyntec  
Kyle Hansen, Tetrattech  
Lee Farris, BRC  
Marcia Scully, Metropolitan Water District of Southern California  
Maria Lopez, Water District of Southern California  
Mark Paris, Landwell  
Matt Pocernich, Neptune & Company Inc  
Michael J. Bogle, Womble Carlyle Sandridge & Rice, LLP  
Michael Long, Hargis + Associates  
Mickey Chaudhuri, Metropolitan Water District of Southern California  
Nicholas Pogoncheff, PES Environmental, Inc.  
Paul Black, Neptune and Company, Inc.  
Paul Hackenberry, Hackenberry Associates, LLC  
Ranjit Sahu, BRC  
Rebecca Shircliff, Neptune and Company, Inc.  
Richard Pfarrer, TIMET  
Rick Kellogg, BRC  
Scott Bryan, Central Arizona Project  
Steve Clough, Nevada Environmental Response Trust  
Tanya O'Neill, Foley & Lardner L  
Todd Tietjen, SNWA

## Attachment A

### **DVSR Comments**

1. Attachment A and Section VI. Matrix Spike/Matrix Spike Duplicate Table is missing information for sample M-7B Matrix Spike/Matrix Spike Duplicate recovery as is listed in Table IV Overall Qualified Results indicating that the recoveries were outside the laboratory acceptance limits.
2. Attachment B and Section XII Overall Assessment of Data. Row six (6) of the 2015 Annual Remedial Performance Sampling section Technical Holding Time (H) should be a lower case (h).

### **EDD Comments**

1. In the results table, the final\_validation\_qualifier for chromium [VI] for one field blank and one equipment blank as well as the initial result for M-95-20150526 is an "R", which indicates the result is rejected. Because the result is qualified as rejected, the detect\_flag\_fod and detect\_flag\_ra should also be populated with an "R". Please correct the "D" in the detect\_flag\_fod and detect\_flag\_ra fields to an "R" to be consistent with the final\_validation\_qualifier.
2. In the results table, there are two results for chromium [VI] for sample M-95-20150526. One result was rejected and one result was qualified with a J- for exceeding holding times. Please use the reanalysis\_flag field in the results table to indicate which is the reanalysis, so only the final result gets uploaded into the database.
3. In the samples table, all of the groundwater samples with the exception of nine samples have a sample\_top\_depth and a sample\_bottom\_depth provided. Please provide the sample\_top\_depth and a sample\_bottom\_depth for these nine samples if available.
4. In the validation\_reason table, the validation\_reason for "m,be" is null. If this is a combination of the "be" and "m" codes, then provide both of those definitions in the validation\_reason field for completeness or just remove the row since both codes are already defined.