



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

July 5, 2016

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 through December 2015, Semi-Annual Remedial
Performance Sampling, Reversion 1, Nevada Environmental Response Trust (NERT),
Henderson, Nevada*

Dated: June 16, 2016

Dear Mr. Steinberg,

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

1. The table listing the samples counts per validation stage/analytical method has been added following the sentence ending "...were validated according to the Stage 4 data validation procedures:" The colon seems to indicate that Stage 4 validation procedures will be listed immediately following. Please address this comment in future deliverable.
2. The new table listing the sample counts per validation stage/analytical method is not referenced in the text. Please address this comment in future deliverable.
3. While sufficient Stage 4 validation of wet chemistry methods was performed, suggest validating at least one sample for each wet chemistry method utilized to verify the analysis was performed and calculated correctly. Please address this comment in future deliverable.
4. The inorganic NFG does not specifically recognize the qualification of batches of samples. Professional judgement is to be applied in determining sample similarity via: "(e.g., location and type of sample, descriptive data, soil classification); field test data (e.g., pH, Eh, conductivity, chlorine); and laboratory data for other parameters (e.g., TSS, TDS, TOC, alkalinity or buffering capacity, reactive sulfide, anions)." Please address this comment in future deliverable.
5. The parameter for sample M-10-20150806 is listed as "pH" instead of "Field pH." Please revise the parameter field for this sample to be consistent with the remaining field pH samples. Please address this comment in future deliverable.

6. The appropriate qualifier has been added to the TDS result for sample PC-144-2015810, but the "final_validation_reason_codes" field was not populated. Please add the appropriate reason code to this field in future deliverable.
7. The parameter for sample M-10-20150806 is listed as "pH" instead of "Field pH." Please revise the parameter field for this sample to be consistent with the remaining field pH samples in future deliverable.
8. The appropriate qualifier has been added to the TDS result for sample PC-144-2015810, but the "final_validation_reason_codes" field was not populated. Please add the appropriate reason code to this field in future deliverable.
9. Please update the EDD according to the comments of No. 5, 7 and 8 and submit updated one within 30 days received this letter.

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

Sincerely,



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

WD

EC:

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Carlton Parker, NDEP BISC Las Vegas
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Allan Delorme, Ramboll Environ
Alison Fong, U.S. Environmental Protection Agency, Region 9
Andrew Barnes, Geosyntec
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Anna Springsteen, Neptune & Company Inc.
Betty Kuo Brinton, MWDH2O
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