



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

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

Brian Sandoval, Governor  
Bradley Crowell, Director  
Greg Lovato, Administrator

August 22, 2017

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: Reversed  
DVSR/EDD for *Soil Flushing Treatability Study Report (Reversion 1)*

Dated: July 3, 2017

Dear Mr. Steinberg,

The NDEP has received and reviewed the Trust's above-identified Deliverable and finds that the DVSR portion of the document is acceptable. The following comments are noted for the EDD. Please submit a reversion of EED based on following comments:

1. The equipment blank results have now been validated; however, there are 149 equipment blank results with a "U" qualification but no associated reason code. Please update the EDD to include the appropriate reason codes for these results;
2. Table 6 and EDD: The number of qualifications now agree; however, as the number of qualifications in the EDD changed markedly, from 246 to 67, please identify the reason so many fewer results are now qualified. (No revision to the DVSR is requested.);
3. EDD: Two records in Rev1 are missing validation\_reason\_codes. Sample TT-TP3-L2-6 for chlorate was qualified as UJ with validation\_reason\_code="fd" and is now qualified as U with no validation\_reason\_code. Sample TT-TP2-B3A-14 for chloride was qualified as J+ with validation\_reason\_code="fd,m" and is now qualified as J with no validation\_reason\_code. Please verify these changes and provide a validation\_reason\_code for each record.
4. EDD: As the original results table contained 7,677 records and the Rev1 results table has only 7,633, the data set was completely checked again, resulting in one additional comment. Sample TT-TP4-M3-20160405-DUP for selenium was originally qualified as J with a validation\_reason\_code="fd,sp" and detect flags of "D". The record for Rev1 now has a qualifier of "U" with validation\_reason\_code="sp" and detect flags of "D". Please indicate the correct detect flags, final\_valiation\_qualifier, and validation\_reason\_code for this record so all fields are consistent with each other.

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:cp

EC:

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Carlton Parker, NDEP BISC Las Vegas  
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Andrew Steinberg, Nevada Environmental Response Trust  
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