



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources
Brian Sandoval, Governor
Bradley Crowell, Director
Greg Lovato, Administrator

September 18, 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: *Health Risk
Assessment for Parcels C, D, and G, Nevada Environmental Response Trust Site,
Henderson, NV*

Dated: July 31, 2017

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 10/18/2017** 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.
Bureau of Industrial Site Cleanup
NDEP-Las Vegas City Office

WD:cp

EC:

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

Brenda Pohlmann, City of Henderson
Brian Waggle, Hargis + Associates
Carol Nagai, MWDH2O
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
Dan Pastor, P.E. TretraTech
Gary Carter, Endeavour
George Crouse, Syngenta Crop Protection, Inc.
Harry Van Den Berg, AECOM
Jay Steinberg, Nevada Environmental Response Trust
Jeff Gibson, Endeavour
Jill Teraoka, MWDH2O
Joanne Otani
Joe Kelly, Montrose Chemical Corporation of CA
Joe Leedy, Clean Water Team
John Edgcomb, Edgcomb Law Group
John Pekala, Ramboll Environ
Kelly McIntosh, GEI Consultants
Kevin Fisher, LV Valley Water District
Kirk Stowers, Broadbent & Associates
Kirsten Lockhart, Neptune & Company Inc.
Kim Kuwabara, Ramboll Environ
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
Michael J. Bogle, Womble Carlyle Sandridge & Rice, LLP
Michael Long, Hargis + Associates
Micheline Fairbank, AG Office
Mickey Chaudhuri, Metropolitan Water District of Southern California
Nicholas Pogoncheff, PES Environmental, Inc.
Paul Black, Neptune and Company, Inc.
Paul Hackenberry, Hackenberry Associates, LLC
Patti Meeks, Neptune & Company Inc.
Peggy Roefer, CRC
Ranajit Sahu, BRC
Rick Perdomo, AG Office
Richard Pfarrer, TIMET
Rick Kellogg, BRC
Scott Bryan, Central Arizona Project
Steve Clough, Nevada Environmental Response Trust
Steven Anderson, LVVWD
Tanya O'Neill, Foley & Lardner L
Todd Tietjen, SNWA

Attachment A

1. Section 5.4.1.3 Dioxin TEQ, states, p. 85. According to this section, dioxins failed the screening process but were still eliminated as a COPC as the UCL was less than the site-specific action level of 0.0027 mg/kg. As a general rule, the NDEP does not allow screening using the UCL. However, a review of the data indicate there is only one sample greater than the action level; that of TSB-CJ-09 with a concentration of 0.0039 mg/kg. It is recommended that: 1) NERT remediate the area associated with this sample and if the resulting confirmation sample is less than the action level, then dioxins would no longer be considered COPCs for this evaluation or 2) Revise the calculation of health risk factors with including TSB-CJ-09 with dioxin concentration of 0.0039 mg/kg.
2. NDEP Specific Comment #14 stated, “Please verify the calculation for sample pairs....as they do not appear to be correct (Table 4 Field Duplicate Qualifications).” NERT Response (Appendix A-2) states “All calculation for field duplicates were updated.” A review of the precision discussion included for the 2013 soil gas investigation (page 47) indicates that “no field duplicates was collected during the 2013 investigation near the Study Area.” As such, tabulation of field duplicate qualifications is no longer included in this report. The NDEP cannot verify whether the calculations were updated.
3. Appendix A-1 Response to Comment Letter – Responses to NDEP Comments on Soil HRA Revision 3, General Comment #5, Asbestos risk calculation workbooks. In the response, it was noted that “...the asbestos cancer risks based on the primary samples only are presented in the uncertainty section...” The NDEP was not able to confirm. Please identify the location in the uncertainty section for this discussion.
4. Executive Summary, top of page, first paragraph, last two sentences, p. ES-4. “In all parcels, chloroform...” Please delete. It appears to be a duplicate.
5. Table 5-23. HIs for Parcel D, Indoor Worker (0.006), Parcel C, Outdoor Worker (0.0006), and Parcel G, Outdoor Worker (0.00005) do not match the main body of the text, page 88. The significant figures do not match. This does not change the overall conclusions of the report.
6. Table 5-24. HI for Parcel G, Construction Worker (0.000002) does not match the main body of the text, page 90. There is an extra “0” but this does not change the overall conclusions of the report.
7. DVSRs (Sections 4.1.1.2, 4.2.1.2, and 4.3.1)
The NDEP could not confirm that the following DVSRs had been reviewed by Neptune:
 - I. All three soil gas DVSRs
 - II. Henderson_Offsite_Relational_062807 DVSR for groundwater
 - III. Soil DVSRs: Parcels C, D, F, G from February 2008, Parcels C, D, F, G, H Supplemental January 2009, Parcel C, D, F, G, and H Soil Confirmations
8. Table 5-1, page 2 of 3, 2,3,7,8-TCDD TEQ reports

No. of Samples	No. of Detects	% Detects
50	50	82

Please correct the percent detects.

9. Table 5-9A and Table 5-9B. “Note [2]: 2,3,7,8-TCDD TEQ was not carried through the risk calculation, but evaluated by comparing the soil EPC to the site-specific action level of 0.0027 mg/kg.” The data included the tables are not attributed with a comment “[2]”. Under

COPC column 2,3,7,8-TCDD TEQ entry is annotated with a [1] note which should likely be changed to [2].