



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

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

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

November 27, 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: *Data Validation Summary Report and EDD for Parcel F Health Risk Assessment Remedial Investigation Sampling April 2017, Nevada Environmental Response Trust (NERT), Henderson, Nevada*

Dated: October 27, 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 12/27/2017** 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](mailto: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  
Chinny Esakkiperumal, Olin Corporation  
Chris Ritchie, Ramboll Environ  
Chuck Elmendorf, Stauffer Management Company, LLC  
Dan Pastor, P.E. TetraTech  
Dave Share, Olin  
Dave Johnson, LVVWD  
Derek Amidon, Tetrattech  
Ebrahim Juma, Clean Water Team  
Ed Modiano, de maximis, inc.  
Eric Fordham, Geopentech  
Gary Carter, Endeavour  
George Crouse, Syngenta Crop Protection, Inc.  
Harry Van Den Berg, AECOM  
Jay Johnson, Central Arizona Water Conservation District  
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  
Katherine Baylor, U.S. Environmental Protection Agency, Region 9  
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 Duffy, U.S. Environmental Protection Agency, Region 9  
Mark Paris, Landwell  
Michael J. Bogle, Womble Carlyle Sandridge & Rice, LLP  
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Nicholas Pogoncheff, PES Environmental, Inc.  
Orestes Morfin, CAP  
Paul Black, Neptune and Company, Inc.  
Paul Hackenberry, Hackenberry Associates, LLC  
Patti Meeks, Neptune & Company Inc.  
Peggy Roefer, CRC  
Ranajit Sahu, BRC  
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

### DVSR Review:

1. **Section 1.0, first paragraph:** The test states there are 72 samples; however, the EDD samples and results tables have 52 samples. Please correct this discrepancy.
2. **Table I:** As other edits are requested, please consider reformatting the header row of Table I to a lighter color that can be read when printed to PDF.
3. **Section 2.2.2, 7.2.2, and 8.2.2, blank qualification:** The text in these sections states that when a result is qualified for an associated blank detect, the result will be qualified as estimated (J). Please edit the text to include the bias which should be applied with the qualifier.
4. **Section 3.1.2, SVOC surrogates:** The text only notes that no qualifications were applied for acid surrogate recoveries >10%. Where the other SVOC surrogates used and evaluated, and were their results acceptable?
5. **Section 5.1.2 and 6.1.2, pesticide and Aroclor internal standards:** The last sentence of these sections states that the internal standard areas and retention times were acceptable. As laboratories do not regularly employ internal standards for Methods 8081 or 8082, please verify that internal standards were utilized.
6. **Section 8.2.2, blank qualification:** The text describing the qualification scheme for results above the PQL is missing a few words. Please consider revising the text to include the words in bold: "If a sample result and blank contaminant value were greater than the PQL and **the sample result was** less than 10 times the blank contaminant value, the sample result was qualified as detected estimated (J+) at the reported concentration.
7. **Section 9.1.3, wet chemistry field duplicates:** The sample identifiers listed in this section are incomplete; both are lacking "18." As other text edits are requested for this DVSR, please correct these IDs.
8. **Section 9.2.1, wet chemistry holding times:** Please include the bias in the holding time "J" qualifier.

### EDD Review

1. In the results table, there are 45 records for radionuclide analyses that do not have a "minimum\_detectable\_activity" (MDA) reported. Please provide the MDA for these records.
2. In the results table, there are 9 records with a final\_validation\_qualifier of "R". For these records, the detect\_flag\_fod and detect\_flag\_ra should be "R". Please update the detect flags.