



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

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

August 8, 2018

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 October through December 2014 Soil Remedial Investigation Sampling
Revision 1 and Response to Comments (RTCs)

Dated: July 6, 2018 and July 10, 2018

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 10/08/2018** 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
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
David Parker, Central Arizona Water Conservation District
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 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 Duffy, U.S. Environmental Protection Agency, Region 9
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.
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
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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. **Sections 2 and 3, duplicate results:** Samples that were analyzed by both 8270 and 8270C SIM have duplicate results for the PAHs. Also, samples that were analyzed by 8260 and 8270 have duplicate results for 1,2,4-trichlorobenzene; 1,2-dichlorobenzene; 1,3-dichlorobenzene; 1,4-dichlorobenzene; hexachlorobutadiene; and naphthalene. Using the validator's professional judgment, reject one set of duplicate results, leaving only one valid value for each analyte, for each sample. Please add text to this section to describe the qualifications and the logic behind the professional judgment.

***NERT Response:** Results for PAHs that have been analyzed by methods 8270 and 8270C SIM and results for 1,2,4-trichlorobenzene; 1,2-dichlorobenzene; 1,3-dichlorobenzene; 1,4-dichlorobenzene; hexachlorobutadiene; and naphthalene analyzed by 8260 and 8270 were validated as part of this data set. Both sets of results were determined to be valid as a result of the data validation; therefore, both sets have been included in the DVSR. The decision on usability will be reserved for the data end user as part of the data evaluation.*

NDEP/Neptune Response: Per a May 29, 2018 letter to Stauffer Management Company, Montrose Chemical Corporation and Olin Corporation, in response to an equivalent request, NDEP requested one value for each analyte be reported in the EDD. (This is consistent with current DVSR guidance.) The letter notes that justification for the choice is to be provided as needed; however, NDEP DVSR guidance (previous and current) requires the reasoning behind professional judgement be documented in the DVSR. Please revise the EDD and DVSR text to report one value for these duplicated analytes and to describe the reasoning behind the values chosen. Results can be rejected or qualified "DNR."