



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

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

April 8, 2019

Jay A. Steinberg
Nevada Environmental Response Trust
35 East Wacker Drive, Suite 690
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: Revised Data
Validation Summary Report and Electronic Data Deliverable, Vacuum Enhanced
Recovery Treatability Study Supplemental Sampling

Dated: February 11, 2019

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. **NDEP's Comment:** In each of the EDDs for NERT VER Treatability and NERT VER Treatability Supplemental, there is a table of field test results. These results will be uploaded to the database with the fields that are provided in the table "field_tests". In addition, the detect_flag_fod and detect_flag_ra will be populated with "D" and the validation_flag will be entered as "F".

NERT response: The EDD was updated to include fields as stated: detect_flag_fod, detect_flag_ra. And validation_flag.

NDEP's Response: After this comment was submitted, more EDDs have been received with various types of test data in tables separate from the main locations, samples, results, and validation_reason tables. Because these field data may need to be uploaded into the NDEP BMI database, please include the data in the locations, samples, results, and validation_reason tables unless there is a reason not to do so.

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:

Jeffrey Kinder, Deputy Administrator NDEP
Frederick Perdomo, Deputy Administrator NDEP
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 Loffman, lepetomane
Brian Waggle, Hargis + Associates
Carol Nagai, MWDH2O
Carrie Hunt, 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.
Greg Kodweis, SNWA
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
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 +
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
Ranjit Sahu, BRC
Richard Pfarrer, TIMET
Rick Kellogg, BRC
R9LandSubmit@EPA.gov
Steve Clough, Nevada Environmental Response Trust
Steven Anderson, LVVWD
Tanya O'Neill, Foley & Lardner L
Todd Tietjen, SNWA