



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

Steve Sisolak, Governor
Bradley Crowell, Director
Greg Lovato, Administrator

April 29, 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: *Data Validation Summary
Report for Phase 2 Remedial Investigation for February through June 2017 Data and Associated
EDD*

Dated: April 2, 2019

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 06/28/2019** 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:

Jeffrey Kinder, Deputy Administrator NDEP
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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.
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Kyle Gadley, Geosyntec
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Lee Farris, BRC
Marcia Scully, Metropolitan Water District of Southern California
Maria Lopez, Water District of Southern California
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Mark Paris, Landwell
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Michael Long, Hargis +
Mickey Chaudhuri, Metropolitan Water District of Southern California
Nicholas Pogoncheff, PES Environmental, Inc.
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Paul Black, Neptune and Company, Inc.
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Tanya O'Neill, Foley & Lardner L
Todd Tietjen, SNWA

Attachment A

DVSR Review:

1. **Introduction, analyte reporting basis:** The list of wet chemistry analytes indicates that Nitrite as Nitrogen is an analyte; however, the EDD lists this analyte as nitrite. Please update the EDD to include the reporting basis for nitrite.
2. **Section 2.0, equipment blanks and trip blanks:** The text states there are “fifty-one equipment blanks and trip blanks; however, there are more than 51 samples appended with ED, FB, TB or EBTB. Please assess the report and EDD and determine which is correct.
3. **Section 8.2.1, broken lid and broken container:** Samples RIDB-14-30.0-20170223 was received with a broken lid and sample RIBD-8-30.0-2017-0222-FD was received broken. How was it determined there was no cross-contamination?
4. **Section 14.4, rejected results:** While the metals had a completeness of greater than 90%, 57% of the niobium results were rejected. How does this affect data quality?
5. **Radionuclide EDD:** In the EDD, radionuclides have the `method_detection_limit` and `sample_quantitation_limit` populated with the `minimum_detectable_concentration`. Neither of these fields need be populated as they are not applicable to radionuclides. Additionally, the `practical_quantitation_limit` is also populated with the `minimum_detectable_concentration`. If populated, this field is most similar to the RL reported by the laboratory. Please revise the radionuclide portion of the EDD such that:
 - a) `method_detection_limit` and `sample_quantitation_limit` fields are null (as these limits are not applicable to radionuclide analyses)
 - b) `practical_quantitation_limit` may be populated with the "RL" reported by the lab

EDD Review

1. The records in the results table that have a `final_validation_qualifier` of “DNR” have a `final_validation_reason_codes` of “orr”. All `final_validation_reason_codes` should be defined in the `validation_reason` table, so “orr” should be added to this table.
2. There are multiple records in the results table where the `method_detection_limit` is greater than the `sample_quantitation_limit`. Review these records to verify that these limits are correct.
3. The `filtered_flag` field has been updated to “TOTAL” and “DISSOLVED” in the revised EDD Guidance. This update should be reflected in all future EDDs.