



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

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

May 9, 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 July through November 2017 Data*

Dated: April 3, 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 06/03/2019** 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

cc w/attachment:

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

Andrew Steinberg, Nevada Environmental Response Trust
Anna Springsteen, Neptune & Company Inc.
Betty Kuo Brinton, MWDH2O
Brenda Pohlmann, City of Henderson
Brian Loffman, Iepetomane
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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Kirk Stowers, Broadbent & Associates
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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
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Steven Anderson, LVVWD
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 has 319 results reported as nitrite. Please update the EDD to include the reporting basis for nitrite.
2. **Section 10.1.7, field duplicates:** The text states qualifications for field duplicate RPD outliers were applied in 5 field duplicate pairs. Ten results are qualified in four field duplicate pairs. Please revise this sentence for clarity.
3. **Section 10.2.1, metals holding time:** Chromium, reported by Method 200.7 in sample PC-40-20170821, was flagged by the laboratory as having been analyzed beyond the holding time. The result was not qualified during data validation. Please verify the holding time was met.
4. **Section 11.2.1, pH holding time:** Thirty-one pH results flagged by the laboratory as having been analyzed beyond the holding time were not qualified during data validation. Please verify the holding times were met. (Also note that this section refers the reader to Attachment I, rather than Attachment J.)
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 filtered_flag field in the results table has been updated to "TOTAL" and "DISSOLVED" in the revised EDD Guidance. This update should be reflected in all future EDDs.
2. There are multiple records in the results table where percent_moisture=0 and the matrix is soil. Please verify that these records should have "0" in this field.
3. In the results table, there are multiple records where the method_detection_limit is greater than the sample_quantitation_limit. Please review these records and update them.
4. See DVSR comment #5.