



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

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

May 30, 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 and EDD for NERT Semi-annual Remedial Performance Sampling (July to December 2018)*

Dated: April 8, 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 07/30/2019** 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
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
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Joanne Otani
Joe Kelly, Montrose Chemical Corporation of CA
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John Edgcomb, Edgcomb Law Group
John Pekala, Ramboll Environ
Kelly McIntosh, GEI Consultants
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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.
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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, Precision and Accuracy of Environmental Data:** In the third paragraph, please also cite the NDEP validation guidelines as the basis for validation.
2. **Section 3.0 and Section 5.4, number of wet chemistry results:** The total number of results listed in these sections, 3,416, is inclusive of the unvalidated field pH data. As the DVSR details the results of validation, please exclude these results in the wet chemistry total and the grand total in Section 5.4.
3. **Section 2.2.2 and Section 3.2.2, ICBs and CCBs:** Text in these sections indicate that ICB and CCB results were assessed; however, Table II notes these blanks were not assessed. Please revise either the text or table to resolve this inconsistency.

EDD Review

4. 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. This does not require a revised EDD unless the DVSR comments are such that a revised EDD is needed.