



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

**STATE OF NEVADA**  
Department of Conservation & Natural Resources

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

January 3, 2020

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, Remedial Investigation Sampling Phase 2, March 2018 through March 2019*

Dated: November 13, 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 03/02/2020** 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](mailto: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.  
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Carrie Hunt, Olin Corporation  
Chris Ritchie, Ramboll Environ  
Chuck Elmendorf, Stauffer Management Company, LLC  
Dan Pastor, P.E. TetraTech  
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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  
Michael J. Bogle, Womble Carlyle Sandridge & Rice, LLP  
Michael Long, Hargis +  
Mickey Chaudhuri, Metropolitan Water District of Southern California  
Nicholas Pogoncheff, PES Environmental, 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, methods list:** There are two discrepancies between the methods list in this section and the EDD: 1) the EDD also has Orthophosphate (total)(as PO<sub>4</sub>) listed as an analyte in Method 300.0; and 2) in the EDD, the method for ferrous iron is SM 3500 and not SM 3500-FE D.
2. **Section 1.0, TO-15 and TO-15 VOL results:** As TO-15 and TO-15 VOL report the results of the same sample/analysis in different units. Although it is noted that at least one other NERT DVSR/EDD has reported both sets of results, it seems that only one set should be reported and loaded to the BMI database so there are no identical results in the database. Is there a reason to keep one set as opposed to the other?
3. **Section 1.0, precision and accuracy, page 3:** The text defines an SRM as “sample reference material.” Please correct this to “standard reference material.”
4. **Section 14.0, metals sample count:** The text notes there are 44 water samples analyzed by 200.8 for arsenic; however, the EDD had 53 samples. Please confirm the number of samples analyzed by 200.8.
5. **Section 14.1.7, field duplicate qualifications:** The qualifications noted were in 4 field duplicate pairs instead of 3, as noted in the text. Please confirm and correct as necessary.
6. **Section 15.0, sample counts:** Please check the following discrepancies in the analyte/sample counts:
  - a. The text reports 95 soil samples analyzed by 300.0, but the EDD has 90.
  - b. The text reports 173 soil samples analyzed by 314.0, but the EDD has 174.
  - c. The text reports 59 soil samples analyzed by SM4500-NH<sub>3</sub>, but the EDD has 74.
7. **Holding time qualifications:** There are 21 results for Method 8260B that were qualified by the laboratory as having exceeded the holding time. None of these results were qualified in validation. Please confirm these results do not require qualification.
8. **Results above the calibration:** The result for PCB 209 in sample RISB-02-1.0-20180924 that was qualified by the laboratory as having been reported above the calibration. This result is not qualified. Please confirm this result does not require qualification.

### EDD Review

1. In the samples table, sample M-39R-20190109 is null for litho. Please provide the litho information if available.
2. Numerous records in the results table have a method\_detection\_limit greater than the sample\_quantitation\_limit. Please check the entries in these two fields.