



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

STATE OF NEVADA  
Department of Conservation & Natural Resources

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

April 29, 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: *Phase 2a Results and Final  
Closeout – Galleria Drive Bioremediation Treatability Study*

Dated: March 27, 2020

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 06/29/2020 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.

Betty Kuo Brinton, MWDH2O  
Brenda Pohlmann, City of Henderson  
Brian Loffman, lepetomaneBrian 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  
John Solvie, Calrk County Water Quasslity  
Kelly McIntosh, GEI Consultants  
Kirk Stowers, Broadbent & Associates  
Kirsten Lockhart, Neptune & Company Inc.  
Kim Kuwabara, Ramboll Environ  
Kurt Fehling, The Fehling Group  
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Marcia Scully, Metropolitan Water District of Southern California  
Maria Lopez, Water District of Southern California  
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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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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, sample counts:** The text states that 48 water and 72 soil samples were collected; however, there are 50 water samples and 74 soil samples in the EDD samples table. Please either correct or explain this discrepancy.
2. **Section 1, laboratories:** The laboratory designated “MI” in the EDD is not identified in this section. Please identify this laboratory and the analyses they conducted.
3. **Section 3.2.2 table reference:** The table listing MS/MSD qualification in Table 9 instead of Table 8, as referenced in the text.
4. **Section 3.4, comparability:** Please include a short discussion regarding the comparability of the chlorate primary and split results analyzed by different methods.

### **EDD Review**

1. In the results table, there are four results with analytical\_method=”PFLA” and analytical\_suite=”Microbial” where the detect\_flag\_fod=”U”, but the result\_reported is not equal to the sample\_quantitation\_limit. Per the EDD guidance, the result\_reported should be set to the sample\_quantitation\_limit for a non-detected result.
2. We have noted that rejected data (records in the results table with final\_validation\_qualifier=”R”) are to be excluded from the BMI database.