



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

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

March 23, 2021

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: *Baseline Ecological Risk
Assessment and Phase 3 Remedial Investigation Modification #7 DVSR and EDD*

Dated: February 16, 2021

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 05/23/2021** 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 702-668-3929.

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
Steve Linder, U.S. Environmental Protection Agency, Region 9
Allan Delorme, Ramboll Environ
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 Rakvica, Syngenta
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\
Debbie Maust. Cap-Az
Derek Amidon, Tetrattech
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Eric Fordham, Geopentech
Gary Carter, Endeavour
Jay Steinberg, Nevada Environmental Response Trust
Jeff Gibson, Endeavour
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John Edgcomb, Edgcomb Law Group
John Pekala, Ramboll Environ
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Kelly McIntosh,GEI Consultants
Kirk Stowers, Broadbent & Associates
Kirsten Lockhart, Neptune & Company Inc.
Kim Kuwabara, Ramboll Environ
Kurt Fehling, The Fehling Group
Kyle.Hansen, Tetrattech
Lee Farris, BRC
M. Santos, NWDH
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.
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Todd Tietjen, SNW
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Attachment A

DVSR Review:

1. Section 2.1.3 – Please clarify why all chloroform non-detects within the batch are not qualified for the low recovery in the matrix spike. The Flag column in the Table in Section VIII of Appendix A indicates “All non-detects” are flagged UJ. The only associated sample listed is the parent sample.
2. Section 8.1.3 – There are two methods used for analysis of total organic carbon, Lloyd Kahn and SW9060. When using “TOC” alone within the DVSR it is difficult to determine which method is being discussed. Please add a reference to which method is affected by the QC exceedances for TOC. Also, the EDD uses a different “parameter” for each method. “Carbon” is used for Lloyd Kahn method and “Total Organic Carbon” is used for SW9060. Please clarify and confirm that “Carbon” is the correct parameter and not “Total Organic Carbon”

EDD Review

File “NERT 2006 EDD Rev 0.accdb”

1. In the samples table, the matrix “WP” is not in the matrix code list in Appendix B of the EDD Guidance. Check Appendix B to see if this sample is represented by any matrix code in the list. If not, please define the “WP” matrix.
2. In the results table, there are 68 results for Acrolein where result_reported is NULL. All of the detect flags are “U” indicating the results are all non-detected concentrations and should be set equal to the SQL per EDD Guidance. Also note that these Acrolein results are reported as TICs. A result_reported should be provided for these records.
3. In the results table, there are 2 results for “%SOLIDS” and 17 results for “Moisture Content” that are reported in “% by wt (dry)”. Please verify the correct units for these records. The lab reports and all other results for these parameters are reported in “%”.