



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

Steve Sisolak, *Governor*
James R. Lawrence, *Acting Director*
Greg Lovato, *Administrator*

September 16, 2022

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 Electronic Data Deliverable for Phase 3 Remedial Investigation
Modification No. 10, Rev. 0

Dated: August 4, 2022

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 **11/16/2022** 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,

Dong Weiquan

Weiquan Dong, P.E.
Bureau of Industrial Site Cleanup
NDEP-Las Vegas City Office

WD:cp

EC:

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Dan Pastor, P.E. TetraTech
Dan Petersen, Ramboll
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William Frier, U.S. Environmental Protection Agency, Region 9

Attachment A

DVSR Review:

1. Several SDGs report a cooler temperature outside of acceptance limit with no explanation either in the SDG or DVSR for the exceedance. When reviewing the COCs there are a series of temperatures recorded that are within acceptance limit. Then there is a single entry of a cooler temperature that is outside the acceptance limit. The laboratory lists all the recorded temperatures in the Job Narrative. Looking at traceability, is there a sample inventory to know which samples were placed in each cooler? From information provided, there is no way to tell which samples were preserved properly and is totally dependent on the lab to identify samples that are received outside required cooler temperature acceptance criteria.

For SDG 550-168578-1, the following cooler temperatures were recorded; 0.9, 2.4, 3.3, 4.4, 5.0, 13.9 and 17.2 °C. The Job Narrative indicates that “All perchlorate containers were received at 13.9 C. The unpreserved containers for 314.0 was also received at 13.9 C for sample 3 thru 6, and 8 thru 10.” There is no discussion in the DVSR regarding this outlier. Why weren't the samples in the cooler received at 17.2 C included in the Job Narrative as well?

EDD Review

File “NERT 2202 EDD Rev 0.accdb”

1. The EDD is acceptable.