

November 27, 2023

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 Screening-Level Health Risk Assessment For 8th Street DVSR and EDD - September 2022 (Data Validation Summary Report for The Screening-Level Health Risk Assessment For 8th Street; Data Validation Summary Report for Asbestos Data from The Screening-Level Health Risk Assessment For 8th Street)

Dated: July 28, 2023

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 **01/29/2024** 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 702-668-3929.

Sincerely,

*Dong Weiquan*

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

WD:AP

EC:

Frederick Perdomo, Deputy Administrator NDEP  
James Dotchin, NDEP BISC Las Vegas  
Alan Pineda, NDEP BISC Las Vegas  
Andrew Steinberg, Nevada Environmental Response Trust  
Anna Springsteen, Neptune & Company Inc.  
Betty Kuo Brinton, Metropolitan Water District of Southern California

Brian Waggle, Hargis + Associates  
Brian Loffman, Nevada Environmental Response Trust  
Brian Rakvica, Syngenta  
Carol Nagai, Metropolitan Water District of Southern California  
Chris Ritchie, Ramboll  
Christine Klimek, City of Henderson  
Chuck Elmendorf, Stauffer Management Company, LLC  
Claire Trombadore, EPA  
Dana Grady, P.E. TetraTech  
Dan Petersen, Ramboll  
Dane Grimshaw, Olin  
Daniel Chan, SNWA  
Darren Croteau, Terraphase Engineering, Inc.  
Dave Share, Olin  
Dave Johnson, LVVWD  
David Bohmann, TetraTech  
Ed Modiano, de maximis, inc.  
Eric Fordham, GeoPentech  
Gary Carter, Endeavour  
Jay A. Steinberg, Nevada Environmental Response Trust  
Jeff Gibson, Endeavour  
Jill Teraoka, Metropolitan Water District of Southern California  
Joanne Otani, The Fehling Group  
Ashley Green, Montrose Chemical Corporation of CA  
Joe Leedy, Clean Water Team  
John Edgcomb, Edgcomb Law Group  
John-Paul Rossi, Stauffer Management Company LLC  
John Solvie, Clark County Water Quality  
Karen Gastineau, Broadbent & Associates  
Kathrine Callaway, Cap-AZ  
Kelly McIntosh, GEI Consultants  
Kelly Richardson, Latham & Watkins LLP  
Kirk Stowers, Broadbent & Associates  
Kirsten Lockhart, Neptune & Company Inc.  
Kim Kuwabara, Ramboll  
Kurt Fehling, The Fehling Group  
Lee Farris, BRC  
Marcia Scully, Metropolitan Water District of Southern California  
Maria Lopez, Metropolitan Water District of Southern California  
Mark Duffy, U.S. Environmental Protection Agency, Region 9  
Mark Paris, Landwell  
Mauricio Santos, Metropolitan Water District of Southern California  
Melanie Hanks, Olin  
Michael J. Bogle, Womble Carlyle Sandridge & Rice, LLP  
Michael Long, Hargis +  
Mickey Chaudhuri, Metropolitan Water District of Southern California  
Nathaniel Glynn, Latham & Watkins LLP

Nicholas Pogoncheff, PES Environmental, Inc.9  
Orestes Morfin, CA  
Paul Black, Neptune & Company  
Peter Jacobson, Syngenta  
Ranajit Sahu, BRC  
Rebecca Sugerman, U.S. Environmental Protection Agency, Region 9  
Richard Pfarrer, TIMET  
Rick Kellogg, BRC  
R9LandSubmit@EPA.gov  
Roy Thun, GHD  
Spencer Lapiers, de maximus  
Steve Clough, Nevada Environmental Response Trust  
Steven Anderson, LVVWD  
Steve Armann, U.S. Environmental Protection Agency, Region 9  
Tanya O'Neill, Foley & Lardner L  
Todd Tietjen, SNWA  
Warren Turkett, Colorado River Commission  
William Frier, U.S. Environmental Protection Agency, Region 9  
Zeitel Sentz, de maximus

## Attachment A

### DVSR Review:

1. Attachment A, Section IV - Continuing Calibration, Benzoic acid and Hexachlorocyclopentadiene %D are greater than 20%. There is no indication of low or high recovery of the continuing calibration relative to the spike level. Non-detect results for Benzoic acid are qualified as estimated, UJ, whereas non-detect results for Hexachlorocyclopentadiene are not qualified as estimated, UJ. Please explain the discrepancy.
2. Attachment H, Section II – Initial Calibration and Initial Calibration Verification – There is no indication of low or high recovery of the ICV. Example, Demeton-O recovery is 103.6% and Demeton-S recovery is 87.8%, both are greater than 20%. However, Demeton-O receives no flagging while Demeton-S receives a qualifier UJ for affected results. Both ICV recoveries appear to be positive or high recovery. Please explain why some results are qualified and others are not qualified. Methyl parathion ICV percent difference is >20%. The appearance is the ICV was recovered high. Should the results for methyl parathion be qualified as UJ when the recovered amount in the ICV is higher than the spike level?
3. No comments on the asbestos DVSR.

### EDD Review:

1. In the results table, the units for 54 asbestos results were “s/g”. These units either need to be defined or corrected.
2. In the results table, update the validation\_flag=”Y” to either “T” or “F” per the EDD guidance.
4. In the results table, there are 108 records that do not have an “analysis\_time”. Indicate whether or not this information is available for each record.
5. In the results table, there are 108 records that do not have a “prep\_time”. Indicate whether or not this information is available for each record.
6. Note that the parameters “Diesel Range Organics[C10-C22]” and “Petroleum Hydrocarbons C22-C32” will be uploaded to the BMI database with a standardized name. All synonyms for parameter names can be found on the BMI database website.