

OFFICE OF THE NEVADA ENVIRONMENTAL RESPONSE TRUST TRUSTEE

Le Petomane XXVII, Inc., Not Individually, But Solely as the Nevada Environmental Response Trust Trustee
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November 23, 2016

Mr. Weiquan Dong, Ph.D.
Bureau of Industrial Site Cleanup
Nevada Division of Environmental Protection
2030 E. Flamingo Rd, Suite 230
Las Vegas NV 89119

RE: NERT Response to NDEP July 25, 2016 Response to: *Data Validation Summary Report, Document No. 04020-023-152 and Associated EDD, Upgradient Investigation, September 2006, Tronox, LLC, Henderson, Nevada*
Nevada Environmental Response Trust
Henderson, Nevada

Dear Mr. Dong:

The Nevada Environmental Response Trust (NERT) has reviewed the Nevada Division of Environmental Protection's (NDEP) July 25, 2016 Response to the above-referenced data validation summary report (DVSR). The DVSR was prepared in September 2006 by ENSR Corporation (ENSR) on behalf of Tronox LLC (Tronox). The DVSR includes soil samples collected from five boring locations within Parcel H as part of the "upgradient investigation"¹. These samples were not included or discussed in previous versions of the parcels soil health risk assessment (HRA)², prepared by Northgate Environmental Management on behalf of NERT, and were not in the database provided to the Trust by Tronox.

NDEP provided 24 comments on the DVSR and four comments on the associated electronic data deliverable (EDD). Following our review of the comments, and considering the anticipated level of effort associated with revising the DVSR in response to the comments, NERT recommends not revising the DVSR and not using the analytical data in the parcels soil HRA. The soil samples were collected by ENSR over 10 years ago. Based on our experience with revising older DVSRs prepared by consultants no longer working at the NERT Site, we anticipate that a significant level of effort will be required to revise the DVSR. Specifically, the estimated cost to revise the DVSR and address additional NDEP comments ranges from \$10,000 to \$15,000. While NERT appreciates the value of data, it does not appear that this additional data will impact the risk results or overall conclusions of the parcels soil HRA. This conclusion is based on a review of the data conducted by Ramboll Environ. Within the soil depth range applicable to risk assessment (i.e., 0 to 10 feet below ground surface), the Parcel H soil samples collected by ENSR were analyzed for chemical analytes, asbestos, and radionuclides. The sampling results are summarized briefly, as follows:

- Chemical analytes: All samples were analyzed for chemical analytes, with detected analytes including most metals, perchlorate, and a small number of volatile organic compounds. The data review indicated that (1) no additional COPCs would be identified if the upgradient data were included in the HRA data

¹ ENSR Corporation (2006). Upgradient Investigation Results, Tronox Facility, Henderson Nevada. October 30.

² The most recently submitted version of the HRA is *Post-Remediation Screening Health Risk Assessment Report for Parcels C, D, F, G, and H*, Revision 3, prepared by Northgate Environmental Management, Inc. and dated June 19, 2014. Revision 4 of this document is in preparation.

set, and (2) the exposure point concentrations used in the HRA would not change.

- Asbestos: Samples were collected at 0.5, 10, and 30 feet below ground surface at one location (M120) and analyzed for asbestos by polarized light microscopy using EPA Method 600-R-93-116. Asbestos was reported as less than the reporting limit of 0.25 percent in all samples. USEPA notes that Method 600-R-93-116 “is not recommended for characterization activities at Superfund sites.”³
- Radionuclides: All samples were analyzed for radionuclides. As you are aware, Neptune and Company, Inc. (Neptune) is currently conducting a background evaluation for radionuclides in Parcel H. Pending the results of the evaluation, it is unclear as to whether the additional upgradient data would impact the conclusions of the background evaluation. Neptune is aware of the additional upgradient samples and could advise as to whether this data would be of value to their analysis.

In summary, considering the anticipated cost and the limited impact of the upgradient data on the risk results, NERT recommends not revising the DVSR and not including the analytical data in the parcels soil HRA. A possible exception is the radionuclide data, for which a separate DVSR could be prepared if the additional data were shown to impact Neptune’s background evaluation.

If you have any questions or concerns regarding this matter, feel to contact me at (702) 960-4309 or at steve.clough@nert-trust.com.

Office of the Nevada Environmental Response Trust



Stephen R. Clough, P.G., CEM
Remediation Director
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³ <https://www.epa.gov/superfund/superfund-asbestos-technical-resources>.

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