



**STATE OF NEVADA**  
Department of Conservation & Natural Resources  
DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor  
Leo M. Drozdoff, P.E., Director  
Colleen Cripps, Ph.D., Administrator

August 22, 2013

Jay A. Steinberg  
Nevada Environmental Response Trust  
35 East Wacker Drive, Suite 1550  
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: *NERT's RTC for the Data Validation Summary Report, Revision 2*

And

*NERT's RTC for the Data Validation Summary Report, Revision 1*

Dated: July 24, 2013

Dear Mr. Steinberg,

The NDEP has received and reviewed the Trust's above-identified Deliverables and provides comments in Attachment A. A revised Deliverable should be submitted **by 09/30/2013** based on the comments found in Attachment A. The Trust should additionally provide an annotated response-to-comments letter as part of the revised Deliverables.

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.  
Special Projects Branch  
Bureau of Corrective Actions  
NDEP-Las Vegas City Office

WD:jd



EC: Greg Lovato, Bureau of Corrective Actions, NDEP  
James Dotchin, NDEP, BCA LV  
Adam Baas, Edgcomb Law Group  
Allan Delorme, ENVIRON  
Andrew Barnes, Geosyntec  
Andrew Steinberg, Nevada Environmental Response Trust  
Ashley Katri, McGinley & Associates  
Betty Kuo, MWDH2O  
Brenda Pohlmann, City of Henderson  
Brian Rakvica, McGinley & Associates  
Brian Waggle, Hargis + Associates  
Cassandra Joseph, AG's Office  
Catherine Sties, MWDH2O  
Charles K. Hauser, Esq., Southern Nevada Water Authority  
Chuck Elmendorf, Stauffer Management Company, LLC  
David Johnson, Central Arizona Water Conservation District  
Ebrahim Juma, Clean Water Team  
Ed Modiano, de maximis, inc.  
Eric Fordham, Geopentech  
George Crouse, Syngenta Crop Protection, Inc.  
Jay Gear, Olin Co  
Jeff Gibson, AMPAC  
Scott Bryan, Central Arizona Project  
Jill Teraoka, MWDH2O  
Joanne Otani  
Joe Kelly, Montrose Chemical Corporation of CA  
Joe Leedy, Clean Water Team  
John Pekala, Environcorp  
Kirk Stowers, Broadbent & Associates  
Kurt Fehling, The Fehling Group  
Kyle Gadleym, Geosyntec  
Lee Farris, BRC  
Marcia Scully, Metropolitan Water District of Southern California  
Mark Paris, Landwell  
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Michael Long, Hargis + Associates  
Mickey Chaudhuri, Metropolitan Water District of Southern California  
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Paul Hackenberry, Hackenberry Associates, LLC  
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Ranajit Sahu, BRC  
Rebecca Shircliff, Neptune and Company, Inc.  
Rex Heppe, Ninyo and Moore  
Richard Pfarrer, TIMET  
Rick Kellogg, BRC  
Ron Zegers, Southern Nevada Water Authority  
Scott Bryan, Central Arizona Project  
Stephen Tyahla, U.S. Environmental Protection Agency, Region 9  
Tanya O'Neill, Foley & Lardner LLP  
Teri Copeland  
Wayne Klomp, AG's Office

## Attachment A

1. Asbestos data should be validated following NDEP guidance (Data Validation Guidance for Asbestos Data in Soils for the Basic Management Incorporated (BMI) Complex and Common Areas, July 2012) and the modified elutriator method (EPA Method 540-R-97-028 with Berman and Kolk Modifications, 2000). It is not clear how any of the DQO measures (e.g., calibration, accuracy, holding time) were determined for Section 8.0 of the DVSR. For example, Section 8.1.1 points the reader to a metals report for instrument calibration in Section 7.1.1. The two main QC measures listed in the modified elutriator method are duplicates and blanks. Instructions or criteria for calibration or analyte quantitation are not discussed. Blanks are required for analysis per the modified elutriator method.
2. Attachment E, it appears that the "Acceptance Limits" column may have formatting issues and needs to be resized to show all the ranges.
3. EDD Comments: in the future to avoid confusion, it is recommended that the same name not be used for sample IDs and location IDs.