



# 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

September 30, 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: *Post-Remediation Screening Health Risk Assessment Report for Parcels C, D, F, G, and H, Revision 2*

Dated: June 27, 2013

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 10/30/2013** based on the comments found in Attachment A. The Trust should additionally provide an annotated response-to-comments letter as part of the revised Deliverable.

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  
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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  
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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. Section 4.2 Data Usability, Criterion V, Data Review, page 21, 2nd full paragraph, 2nd and 4th bullets. The section notes that MS/MSD recoveries were outside of control limits in 570 instances and that holding-time exceedances in 75 instances. The Deliverable should discuss the potential effect on the risk assessment in the uncertainty analysis section.
2. Section 4.2 Data Usability, Criterion VI, Data Quality Indicators, page 22, 2nd paragraph, last two sentences. The Deliverable should be updated to identify the rejected data (e.g., table format) and how these occurrences potentially affect the risk assessment (e.g., spatial coverage, etc.) and are discussed in the uncertainty analysis section.
3. Table 5 Parcel Chemicals of Potential Concern (COPC) Selection. While it is noted that the April 2010 BCL table was the latest version in effect during remediation, however, the Deliverable should still rely upon the latest BCL table and guidance (August, 2013) for screening purposes. Please update accordingly.
4. Table 9 Summary of Toxicity Criteria and Absorption Factors for Chemicals of Potential Concern. The Deliverable should rely upon the latest toxicity criteria for each of the COPCs. Please update accordingly.
5. Editorial Changes. Page 25 footnote #5. Please change “contaminate” to “contaminant”.