



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

April 22, 2014

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: *Data Validation Summary Report, July through December, 2013, Annual Remedial Performance Sampling and Electronic Data Deliverable, Nevada Environmental Response Trust Site, Henderson, Nevada*

Dated: February 27, 2014

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 6/30/2014** 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 702-486-2850 x252.

Sincerely,

Weiquan Dong, P.E.
Special Projects Branch
Bureau of Corrective Actions
NDEP-Las Vegas City Office

WD:jd

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Stephen Tyahla, U.S. Environmental Protection Agency, Region 9
Susan Crowley, Crowley Envirn.
Tanya O'Neill, Foley & Lardner LLP
Teri Copeland
Wayne Klomp, AG's Office

Attachment A

DVSR Review:

1. Section 2.1.1 and Attachment A (III). The DVSR text for instrument calibration indicates that all CCVs met the acceptance criteria; however, Attachment A (III) does not. Attachment A indicates there was a CCV issue with chromium and samples were qualified. Please verify this is correct and revise the DVSR and Attachment A to be in agreement.
2. Section 3 and Attachment B. Section 3 combines 12 different methods and their QA/QC into a single section. This makes it confusing as to what QC was checked for each method. If this format is to remain, each subsection of Section 3 should indicate which method/suite requires the QA/QC that were validated and discussed. In addition, the DVSR Section 3.1.2 discusses surrogate QC, but this is not mentioned in Attachment B.
3. Section 1 and Attachment B (I). The Representativeness discussion in Section 1 states, "In accordance with EPA guidance (USEPA 2004), sample results for analyses that were performed after the method holding time but less than two times the method holding time were qualified as estimated (J- or UJ) and sample results for analyses that were performed after two times the method holding time were qualified as rejected (R)." There are some pH results (e.g., SDGs 440-56361-1, 440-54862-1, 440-54975-1, 440-55076-1, 440-55218-1, 440-55674-1, 440-55769-1, 440-55874-1, and 440-61402-1) that were analyzed beyond 2x the 48-hour holding time. The results for these samples were J qualified versus rejected. Due to the uniqueness of pH results, there is likely a reason why these results were not rejected. There is concern that a pH measured after 4+ days would not be representative of the initial sample pH. This depends on the sample, how it was stored and if there was atmospheric exposure. The DVSR should discuss this and verify if the results should have been J qualified.
4. Section 5.3 and Attachment B (I). Section 5.3 states, "Sample preservation, and sample integrity criteria were met." This is not the case for Attachment B (I) where TDS preservation issues were discussed. The DVSR and DV results in Attachment B should be in agreement.

EDD Review:

5. There were 33 records for perchlorate in the results table where the final_validation_qualifier was "R", indicating that the result was rejected. The EDD guidance requires that the detect_flag_fod and detect_flag_ra should also be an "R"; therefore, the detect_flag_fod and the detect_flag_ra fields need to be updated with an "R" for the rejected results. This can be corrected during the data import process instead of submitting a revised EDD for this update. Please note this for future EDDs.
6. Location_id H-28A in the samples table did not have a sample_top_depth or sample_bottom_depth and had a hydro entry of "NA". These fields are required in the EDD guidance. The all wells database does not have any additional information and shows that the well has been plugged and abandoned. Please verify that depth and hydro information is not available for H-28A for this sampling event.