



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

December 26, 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: *DVSR and EDD for Annual Remedial Performance Report for Chromium and Perchlorate, July 2013 – June 2014, Nevada Environmental Response Trust Site, Henderson, Nevada*

Dated: October 31, 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 01/30/2015** 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

EC: Greg Lovato, NDEP, Dpty Admin., Carson City
James Dotchin, NDEP, BCA LV
Adam Baas, Edgcomb Law Group
Allan Delorme, ENVIRON
Alison Fong, U.S. Environmental Protection Agency, Region 9
Andrew Barnes, Geosyntec
Andrew Steinberg, Nevada Environmental Response Trust



Betty Kuo, MWDH2O
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Charles K. Hauser, Esq., Southern Nevada Water Authority
Chris Ritchie, Environ Co.
Chuck Elmendorf, Stauffer Management Company, LLC
Dave Share, Olin
David Johnson, Central Arizona Water Conservation District
Ebrahim Juma, Clean Water Team
Ed Modiano, de maximis, inc.
Eric Fordham, Geopentech
Frank Johns, Tetrattech
George Crouse, Syngenta Crop Protection, Inc.
Dave Share, Olin Co
Jay Steinberg, Nevada Environmental Response Trust
Jeff Gibson, AMPAC
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Joe Leedy, Clean Water Team
John Pekala, Environcorp
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Kirk Stowers, Broadbent & Associates
Kurt Fehling, The Fehling Group
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Matt Pocernich, Neptune & Company Inc
Michael Long, Hargis + Associates
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Richard Pfarrer, TIMET
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Ron Zegers, Southern Nevada Water Authority
Scott Bryan, Central Arizona Project
Susan Crowley, Crowley Envirn.
Tanya O'Neill, Foley & Lardner LLP
Wayne Klomp, AG's Office

Attachment A

DVSR Review:

1. Attachments A and B, Sample Result Verification. Sections XI and IX of Attachments A and B, respectively, discuss issues related to dissolved versus total hexavalent chromium; however, it does not discuss how the issue was handled. Please provide an explanation as to how the issues were handled and why (i.e., reason for qualifications or no qualifications).
2. Sections 2.1.7 and 3.1.7, Attachments A (XII) and B (X), Rejected Data. Sections XII and X of Attachments A and B, respectively, indicate that results were rejected when there was more than one result for a single sample. It is not recommended that data be rejected unless there is QC issue that requires this action. Also note that rejection of data due to duplicate analyses can confuse the interpretation of completeness. When handling duplicate data points, it is recommended that the "unused" data be denoted with a specific code or qualifier (e.g., X) that would not be confused with a quality-related issue. Additionally, there needs to be clarification about the data (e.g., duplicated data or data from independent analyses) and a discussion as to how the retained data points are chosen so as not to bias the overall results.
3. Sections 2.2.2 and 3.2.2, Blank Contamination. For metals and wet chemistry, it would be useful if the associated attachments had tables that allowed one to directly compare the sample result to the blank result and the associated PQL/SQL. The way the tables are currently organized does not allow for direct comparison of these values.
4. Section 3.2.1 and Attachment B (I), Holding Times. Please revise the second sentence of the first paragraph in Section 3.2.1. It indicates that all samples met their holding time when they did not. Additionally, Section I of Attachment B indicates that non-detect results were rejected when the holding time was exceeded by greater than two times. It is not made clear if any samples were actually rejected for this issue. Section 5.4 indicates that no results were rejected; however, it should be made clear if any results were rejected specific to holding time issues where rejection is a possibility.

EDD Review:

1. There were 408 records in the results table that had a prep_date and prep_time, but the preparation_method was blank. Please provide a preparation method if it is available.
2. There were 10 records for phosphate in the results table that have a PQL reported, but the SQL is blank. Please provide the SQL for these records if it is available.