



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

**STATE OF NEVADA**  
Department of Conservation & Natural Resources

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

May 19, 2015

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 2014, Annual Remedial Performance Sampling, Nevada Environmental Response Trust (NERT), Henderson, Nevada*

Dated: April 10, 2015

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 06/19/2015** 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](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, 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  
Brenda Pohlmann, City of Henderson  
Brian Waggle, Hargis + Associates  
Catherine Sties, MWDH2O  
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  
Derek Amidon, Tetrattech  
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  
Jasmine Mehta, AG Office  
Jay Steinberg, Nevada Environmental Response Trust  
Jeff Gibson, AMPAC  
Jill Teraoka, MWDH2O  
Joanne Otani  
Joe Kelly, Montrose Chemical Corporation of CA  
Joe Leedy, Clean Water Team  
John Pekala, Environcorp  
Katherine Baylor, U.S. Environmental Protection Agency, Region 9  
Kevin Fisher, LV Valley Water District  
Kevin Lombardozi, Valhi  
Kirk Stowers, Broadbent & Associates  
Kurt Fehling, The Fehling Group  
Kyle Gadley, Geosyntec  
Lee Farris, BRC  
Marcia Scully, Metropolitan Water District of Southern California  
Maria Lopez, Water District of Southern California  
Mark Paris, Landwell  
Matt Pocernich, Neptune & Company Inc  
Michael J. Bogle, Womble Carlyle Sandridge & Rice, LLP  
Michael Long, Hargis + Associates  
Mickey Chaudhuri, Metropolitan Water District of Southern California  
Nicholas Pogoncheff, PES Environmental, Inc.  
Paul Black, Neptune and Company, Inc.  
Paul Hackenberry, Hackenberry Associates, LLC  
Peggy Roefer, Southern Nevada Water Authority  
Ranajit Sahu, BRC  
Rebecca Shircliff, Neptune and Company, Inc.  
Richard Pfarrer, TIMET  
Rick Kellogg, BRC  
Ron Zegers, Southern Nevada Water Authority  
Scott Bryan, Central Arizona Project  
Steve Clough, Nevada Environmental Response Trust  
Susan Crowley, Crowley Environ.  
Tanya O'Neill, Foley & Lardner LLP

## Attachment A

### **DVSR Comments**

1. Section 1.0, page 3, Qualifier Hierarchy. It appears that the qualifier hierarchy has been truncated from previous DVSRs and the following statement was removed from this DVSR. "UJ = U plus J or J-" and "The UJ flag is used when a non-detected (U) flag is added to a biased (J-) or non-biased flag (J)." This hierarchy should be used with non-detects that may be affected by non-biased or potentially low biased QC issues. Previous comments may have created confusion, but please add this back into the DVSR and confirm this is the hierarchy used for data validation. Note that a UJ is not used with there is a potential positive bias (J+) since a positive bias would theoretically result in a detect.
2. Section 1.0, page 6, Sensitivity. Define MDL, SQL, and PQL per NDEP guidance (4/13/09), including details as to how they are determined.
3. Section 1.0, QC Checks. Please add a table that lists the QC checks performed for each validation stage.
4. Section 3.1.2, Surrogates. Note that this suggestion is in the DVSR, but is not discussed in Attachment B.
5. Section 3.1.7, Not Reportable Data. Please discuss in the DVSR how the data considered "not reportable" were qualified (i.e., qualifier/code used). Also, discuss in the DVSR what criteria or guidelines were used to determine which data would be reported and which were not.
6. General, Results Between the SQL and PQL. The EDD includes samples that are qualified due to results between the SQL and PQL. Please describe this in the DVSR and include a table.
7. Table III. There are no results listed for EB-1 for chromium and FB-1 for chromium, hexavalent in this table. Please revise as necessary.

### **EDD Comments**

Location M-94 was the only location\_id that did not have a sub\_area provided. The EDD guidance requires a sub\_area for all locations. Please provide the sub\_area for M-94 if it is available.