



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

Brian Sandoval, Governor
Leo M. Drozdoff, P.E., Director
David Emme, Administrator

May 19, 2016

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 and EDD, July through December 2015, Semi-Annual Remedial
Performance Sampling, Nevada Environmental Response Trust (NERT), Henderson,
Nevada*

Dated: April 29, 2016

Dear Mr. Steinberg,

The NDEP has received and reviewed the Trust's above-identified Deliverables and provides comments in Attachment A. A revised Deliverables should be submitted by **6/30/2016** 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 or 702-486-2850 x252.

Sincerely,

Weiquan Dong, P.E.
Bureau of Industrial Site Cleanup
NDEP-Las Vegas City Office

WD:jp

Ec: James Dotchin, NDEP BISC Las Vegas
Carlton Parker, NDEP BISC Las Vegas
Adam Baas, Edgcomb Law Group
Allan Delorme, Ramboll Environ
Alison Fong, U.S. Environmental Protection Agency, Region 9
Andrew Barnes, Geosyntec
Andrew Steinberg, Nevada Environmental Response Trust
Anna Springsteen, Neptune & Company Inc.
Betty Kuo Brinton, MWDH2O
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Brian Waggle, Hargis + Associates
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Charles K. Hauser, Esq., Southern Nevada Water Authority
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Dave Share, Olin
David Johnson, Central Arizona Water Conservation District
Dave Johnson, LVVWD
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Ed Modiano, de maximis, inc.
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Scott Bryan, Central Arizona Project
Steve Clough, Nevada Environmental Response Trust
Tanya O'Neill, Foley & Lardner L
Todd Tietjen, SNWA

Attachment A

DVSR Review:

1. **Section 1.0:** The references listed in this section include the 2004 version of the National Functional Guidelines (NFG). Please update all references to the NFG (and validation criteria, if necessary) to the 2014 version of this document.
2. **Section 1.0, data qualifier definitions:** In the last sentence of the definition of the "R" qualifier, redundant data are noted to be rejected. How is this different from the "DNR" qualifier?
3. **Section 1.0, data qualifier definitions:** Text describing the "J" qualifier notes results are qualified as estimated when a blank exceedance is insufficient to cause result rejection. Current guidance on blank qualification suggests only the estimation of data based on blank results and not rejection. Please correct this inconsistency or add additional information to the blank corrective actions in Section 2.2.2, to support rejection of sample results due to blank detects.
4. **Section 1.0, data qualifier hierarchy:** Per the National Functional Guidelines, bias is not applied to nondetected results. Please remove the J- from the UJ definition
5. **Section 1.0, precision:** The text indicates RPD is calculated using percent recoveries but the equation variable definitions are specific to calculating an RPD for laboratory/field duplicates, as they specify analyte concentrations. Please clarify it.
6. **Section 1.0, third paragraph on page 4:** This paragraph seems to discuss laboratory duplicates, but does not introduce them as such. Please clarify it.
7. **Sections 2.1.2, MS/MSD Samples:** For matrix spike outliers, the NFG (inorganic) requires the qualification of all samples of the same matrix in an SDG, if the samples are considered sufficiently similar. As there are other samples in the SDG containing M-80-20150806, should any of these samples be qualified?
8. **Section 2.1.6, Target Identification:** Validation of metals analyzed by ICP (Method 200.7) does not usually encompass target compound identification as there are no retention times or mass spectra to assess. Please provide more detail regarding what was assessed in this validation step.
9. **Section 3.0, sample counts:** The text lists 389 samples as analyzed for pH by Standard Method 4500H+B. The EDD reports a single sample as analyzed by this method. The EDD also contains 402 results for field pH by method WPH. Please correct this inconsistency in the sample count/method identification in the text and Table I or in the EDD "parameter" and "analytical_method" fields. If the WPH method is correct, it should be included in the list of wet chemistry methods in Section 1.0.
10. **Section 3.0, result count:** The next to last sentence in this section notes there are 1,531 wet chemistry records; however, the EDD has 1,545 records (not including surrogate results or duplicated analyte results). Please correct this inconsistency. (Also see comment #13.)

11. **Section 3.1.7, duplicate data:** Duplicate results for nitrate and nitrite were rejected in sample M-10-20150816. Text in this section indicated the results were "not reportable," instead of "rejected." Should these results have been qualified DNR, as per the qualifier definition on page 3?
12. **Section 5.1, second paragraph:** The text in this section indicates there were outliers reported in Section 3.1.6 (wet chemistry field duplicates); however, no outliers were noted in this section or in the correlated Wet Chemistry Data Validation Report section (Attachment B, Section X). Please correct this inconsistency.
13. **Section 5.4, completeness table:** The table in this section reports 1,531 wet chemistry analytes; however, the EDD has 1,545 (not including surrogate results or duplicated analyte results). Please correct his inconsistency.
14. **DVSR to EDD Check:**
 - a. The TOX result for sample M-6A-20150810 was qualified "F1" by the laboratory, indicating a matrix spike outlier; however, the result was not qualified. The sample was not reported as having a high recovery in the correlated data validation report (Attachment B, Section VII) nor does the data validation report indicate qualification was not required because the sample result was more than four times the spike concentration. Please assess the data to see if the TOX result for M-6A-20150810 should have been qualified.
 - b. The TDS result for sample PC-144-20150810 was qualified "H" by the laboratory, indicating an exceeded holding time, but the result was not qualified. Per the sample ID, the sample was collected on 8/10 and per the EDD "analysis_date," the sample was analyzed on 8/24. Please assess the data to see if this sample should be qualified or if there is an error in the EDD.

EDD Review

1. The EDD is acceptable; however, a revised EDD will need to be submitted if changes are required based on the DVSR comments.