NEVADA DIVISION OF
ENVIRONMENTAL
PROTECTION

STATE OF NEVADA
Department of Conservation & Natural Resources
Brian Sandoval, Governor
Bradley Crowell, Director
Greg Lovato, Administrator

December 5, 2017

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 for March 2013 Soil Gas Sampling, Nevada Environmental Response Trust (NERT), Henderson, Nevada*

Dated: September 22, 2016

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 12/25/2017** 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,

Dong

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

WD:cp

EC:
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Carlton Parker, NDEP BISC Las Vegas
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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Carol Nagai, MWDH2O

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Chinny Esakkiperumal, Olin Corporation
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Dave Johnson, LVVWD
Derek Amidon, Tetratech
Ebrahim Juma, Clean Water Team
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Jay Steinberg, Nevada Environmental Response Trust
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Kyle Gadley, Geosyntec
Kyle.Hansen, Tetratech
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Peggy Roefer, CRC
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Richard Pfarrer, TIMET
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Scott Bryan, Central Arizona Project
Steve Clough, Nevada Environmental Response Trust
Steven Anderson, LVVWD
Tanya O'Neill, Foley & Lardner L
Todd Tietjen, SNWA

## Attachment A

**DVSR Review:**

1. **Section 1.0, qualifier definitions:** Listing "None" among the qualifier definitions gives the impression that "None" is a valid value for the final_validation_qualifier field. Please discuss the meaning of "no qualifier applied" within the body of the text.

2. **Section 1.0, qualifier definition:** As sample results are no longer censored for detected in associated blanks, please remove the following sentence from the definition of the "U" qualifier.

   > The "U" flag is used to qualify any result that is detected in an environmental sample and associated blank at less than the PQL.

3. **Section 1.0, qualifier hierarchy:** The National Functional Guidelines does not recognize the use of the UJ qualifier with bias (UJ+ or UJ-). Please eliminate the text discussing bias with respect to the UJ qualifier.

4. **Section 1.0, precision:** The discussion of precision states that RPD is calculated from percent recoveries but the RPD equation uses concentration. Please revise the text to use either recovery or concentration.

5. **Section 1.0, representativeness/holding times:** The text indicates that results analyzed beyond two times the holding time are rejected; however, detected results would not be rejected. Please revise the text to indicate this.

6. **Section 2.1.1, continuing calibration:** The text notes 13 methylene chloride results were qualified. Were the remaining %Ds acceptable?

7. **Section 2.1.2, surrogates:** The surrogate validation_stage field is not NULL. As surrogates are not validated and the results are not counted in the total to calculate completeness, please edit this field.

8. **Section 2.2.2, blank qualification scheme:** Should the italicized words be added to the scheme below?

   > Results Above the PQL If a sample result and blank contaminant value were greater than the PQL and the sample results was less than 10 times the blank contaminant value, the sample result was qualified as detected estimated (J+) at the concentration reported in the sample results.

9. **Sections 4.1 and 4.2, precision and representativeness:** Approximately 30% of the field duplicate results were qualified for RPD (or difference) outliers and 75% of all data (including the field duplicate results) were qualified due to the detection of helium, the leak detection compound. Given the large percentage of data qualified for these issues, a discussion of possible impacts on data representativeness and precision is warranted. (As these data are likely biased low, the discussion could also include potential effects on the usefulness of the data in the health risk assessment.)

**EDD Review**

1. The result_reported field in the results table has 534 records that have a null entry. For results that were not detected, the result_reported should be equal to the sample_quantitation_limit. In addition, the records that were not qualified do not show the final_validation_qualifier of "U".