



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

Brian Sandoval, Governor
Bradley Crowell, Director
Greg Lovato, Administrator

December 27, 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 for Parcel F Health Risk Assessment Remedial Investigation Sampling
April 2017 Revision 1, Nevada Environmental Response Trust (NERT), Henderson,
Nevada*

Dated: December 19, 2017

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 02/27/2018** 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.
Bureau of Industrial Site Cleanup
NDEP-Las Vegas City Office

WD:cp

EC:

James Dotchin, NDEP BISC Las Vegas
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
Brenda Pohlmann, City of Henderson
Brian Waggle, Hargis + Associates
Carol Nagai, MWDH2O
Chinny Esakkiperumal, Olin Corporation
Chris Ritchie, Ramboll Environ
Chuck Elmendorf, Stauffer Management Company, LLC
Dan Pastor, P.E. TetraTech
Dave Share, Olin
Dave Johnson, LVVWD
Derek Amidon, Tetrattech
Ebrahim Juma, Clean Water Team
Ed Modiano, de maximis, inc.
Eric Fordham, Geopentech
Gary Carter, Endeavour
George Crouse, Syngenta Crop Protection, Inc.
Harry Van Den Berg, AECOM
Jay Johnson, Central Arizona Water Conservation District
Jay Steinberg, Nevada Environmental Response Trust
Jeff Gibson, Endeavour
Jill Teraoka, MWDH2O
Joanne Otani
Joe Kelly, Montrose Chemical Corporation of CA
Joe Leedy, Clean Water Team
John Edgcomb, Edgcomb Law Group
John Pekala, Ramboll Environ
Kelly McIntosh, GEI Consultants
Kevin Fisher, LV Valley Water District
Kirk Stowers, Broadbent & Associates
Kirsten Lockhart, Neptune & Company Inc.
Kim Kuwabara, Ramboll Environ
Kurt Fehling, The Fehling Group
Kyle Gadley, Geosyntec
Kyle Hansen, Tetrattech
Lee Farris, BRC
Marcia Scully, Metropolitan Water District of Southern California
Maria Lopez, Water District of Southern California
Mark Duffy, U.S. Environmental Protection Agency, Region 9
Mark Paris, Landwell
Michael J. Bogle, Womble Carlyle Sandridge & Rice, LLP
Michael Long, Hargis + Associates
Micheline Fairbank, AG Office
Mickey Chaudhuri, Metropolitan Water District of Southern California
Nicholas Pogoncheff, PES Environmental, Inc.
Orestes Morfin, CAP
Paul Black, Neptune and Company, Inc.
Paul Hackenberry, Hackenberry Associates, LLC
Patti Meeks, Neptune & Company Inc.
Peggy Roefer, CRC
Ranajit Sahu, BRC
Richard Pfarrer, TIMET
Rick Kellogg, BRC
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

1. **Section 2.2.2, 7.2.2, and 8.2.2, blank qualification:** The text in these sections states that when a result is qualified for an associated blank detect, the result will be qualified as estimated (J). Please edit the text to include the bias which should be applied with the qualifier. The National Functional Guidelines does recommend assigning bias to organic results in some cases of blank contamination (see volatile Section VI.E.4). Please consider this use of bias.
2. **Section 5.1.2 and 6.1.2, pesticide and Aroclor internal standards:** The last sentence of these section states that the internal standard areas and retention times were acceptable. As laboratories do not regularly employ internal standards for Methods 8081 or 8082, please verify that internal standards were utilized. A review of the EDD table “samples_LabQCSamples” shows the use of surrogates for these methods but no internal standards. NDEP suggests either contacting the data validator or reviewing the laboratory data packages to ascertain if internal standards were actually used. Otherwise, please provide the laboratory data packages so we can make this determination.