



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

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

February 5, 2018

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 Revision 1, Nevada
Environmental Response Trust (NERT), Henderson, Nevada*

Dated: December 20, 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 03/05/2018** 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
David Parker, Central Arizona Water Conservation District
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 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 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.
NERT Response: In Section 1.0, precision, the text has been revised to state that relative percent difference (RPD) is calculated from reported concentrations.
NDEP Response: The paragraph following the definition of “D1” and “D2” still refers to calculating RPD from percent recovery. As a revision to the text is requested in DVSR comment 9, we also request the completion of this edit.
2. **Section 2.1.1, continuing calibration:** The text notes 13 methylene chloride results were qualified. Were the remaining %Ds acceptable?
NERT Response: In Section 2.1.1, continuing calibration, the text notes 13 methylene chloride results were qualified. The remaining percent difference (%Ds) were within acceptance criteria. No changes were made to the DVSR.
NDEP Response: Noted. In the future, it would add clarity to note there were no other outliers or qualifications.
3. **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.)
NERT Response: Field duplicate RPDs were reassessed for consistency with current field duplicate protocol. Associated results were qualified only when the RPD exceeded the precision goal and both field duplicate results were greater than the PQL. After requalifying, fewer than 11% of all results were qualified due to RPD outliers. The data validation columns in the EDD have been updated with these qualifiers.

This requalification is consistent with NDEP’s June 5, 2017 comments on the NERT Parcel C DVSR. Comment 12 states:

A number of nondetect results and results detected below the PQL were qualified for field duplicate RPD outliers. Given the additional uncertainty in results reported below the PQL, these seem like unnecessary qualifications.

Leak check data were reviewed. Of the 13 samples, the helium concentration was greater than five percent of the concentration in the shroud in only one sample, E-SG-6-030813. The 65 results for this sample are qualified due to the detection of helium. After review of leak check data, fewer than eight percent of all results were qualified.

NDEP Response: Please revise the text to include the logic behind the professional judgement (or cite the guiding document containing the criterion) used to “unqualify” 585 sample results for detection of the leak check compound.