



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

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

April 27, 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 January through March and May 2015 Groundwater
Remedial Investigation Sampling, Nevada Environmental Response Trust (NERT),
Henderson, Nevada*

Dated: November 20, 2017 and February 6, 2018

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 06/27/2018** 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
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

DVSR Review:

1. **Section 1, pH method:** The text lists the pH analytical method as 9040C; however, the EDD lists the method as WPH. Please revise either the text or the EDD to correct this discrepancy.
2. **Table III, sample counts:** Sample counts presented in Table III do not match the counts obtained from the EDD. Counts in the table below were taken from Table III and the sample counts from the EDD are listed parenthetically. Please check the sample counts and correct Table III as necessary and verify the sample counts reported in the introductory section for each method, the section describing the samples validated to Stage 4 and the table in Section 14.4.

Parameter	Stage 2B	Stage 4	Total
1,2,3-TCP & 1,4-Dioxane	161	24 (24)	185
Dissolved Metals (200.7/200.8)	174 (170)	24	198 (194)
Metals (200.7/200.8)	23 (26)	2 (3)	25 (29)
Dissolved Mercury	76 (74)	7	83 (81)
Mercury	8 (10)	1	9 (11)
Anions	191 (192)	27 (26)	218
Nitrate/Nitrite as Nitrogen	191 (192)	27 (25)	218 (217)
Chlorate	166 (167)	26 (25)	192
Perchlorate	168 (169)	27 (26)	195
Alkalinity	83 (84)	9 (8)	92
TDS	195 (196)	28 (27)	223
Ammonia as Nitrogen	126 (127)	23 (22)	149
TOC	83 (84)	9 (8)	92
Sulfide	83 (84)	9 (8)	92

3. **Section 2.0, VOC analyte list:** The samples analyzed for VOCs appear to have several different target compound lists (1, 61, or 63 analytes). Could this be noted in this section, and could the requested list be noted in Table I (e.g., * for 61 analytes, + for 1, etc.).
4. **Section 4.1.3, MSD/MSD recovery criterion:** Should the MS/MSD criterion listed in parentheses be <10% rather than <0%.
5. **Sections 4.2.2, 5.2.2, 6.2.2, 8.2.2, 9.2.2, 10.2.2, blank qualification strategy:** The blank qualification strategy is not described in these sections. Please either list the qualification strategy in this section or refer to a section that has this information.
6. **Section 8, rejected results:** The text in this section states that the results were rejected for holding time exceedances; however, the EDD shows the two results were qualified for matrix spike recovery outliers (reason code "m").
7. **Section 8.1.3, qualified sample counts:** The EDD contains 273 results qualified "UJ" and "J-" and 6 results qualified "J" for MS/MSD recovery outliers; however, the text states 279 results were qualified "UJ" and "J-" and does not specify that any results were qualified "J."
8. **Section 8.2.1, pH holding time qualifications:** Please add text to this section to discuss the reason no bias was added to the pH samples qualified for holding time exceedances.

9. **Section 14.2, holding time qualifications:** The text in this section indicates that a VOC result was qualified for a holding time exceedance; however, this result was qualified for headspace. Please edit the text in this section to accurately reflect the qualifications applied.
10. **Section 14.4, SVOC completeness:** The overall completeness did meet the $\geq 90\%$ criterion; however, the SVOC completeness was less than 90%. Please discuss the effect on the SVOC data.
11. **EDD Qualifications:** Please check the Nitrate-NO₃ result for sample M-69-20150204. The laboratory qualification indicates this sample was analyzed beyond the holding time.

EDD Review

1. In the results table, a minimum_detectable activity is not reported for any of the radionuclide results. Please provide the minimum_detectable activity for these results.