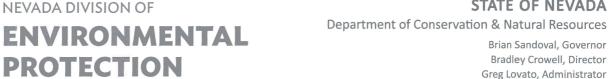
STATE OF NEVADA



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

September 4, 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 for the Vacuum Enhanced Recovery Treatability Study, Revision 0

Dated: July 12, 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 11/05/2018 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,

Weiguan 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, Tetratech

Ebrahim Juma, Clean Water Team

Ed Modiano, de maximis, inc.

Eric Fordham, Geopentech

\Frederick Perdomo, AG Office

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, Tetratech

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
R9LandSubmit@EPA.gov
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. <u>Section 2.1, last paragraph:</u> Possible causes of poor precision would not normally include matrix interference, as matrix interference would be expected to have the same effect on duplicate and parent (or MS and MSD) samples. Sample heterogeneity can cause poor precision. Please revise this text accordingly.
- 2. <u>Section 2.3, next to last paragraph:</u> To clarify, consider revising this sentence to include the words in **bold**: Contaminants found in both the environmental sample and the blank sample are assumed to be laboratory artifacts if both values are less than the PQL or if a sample result and blank contaminant value are greater than the PQL and the sample result is less than 10 times the blank contaminant value."
- 3. Sections 3.1.4, 3.2.1, 3.2.2: Please include the number of results qualified in these sections.
- 4. <u>Sections 3.2.2 and 3.2.6:</u> The text notes that in cases where dilutions cause low recoveries, no qualifications are applied. Please note the dilution factor at which compounds/surrogates are considered to be diluted out.
- 5. <u>Section 3.3.1, holding time bias</u>: Please add bias to the holding time qualification for chloroform in sample VER-01D-35.0-20171020.
- 6. <u>Section 3.5</u>: In order to show that rejecting 69 results did not adversely affect the VOC completeness, please present the completeness by method.
- 7. <u>Section 1, Table 2, Validation Stage</u>: Current NDEP guidance allows surface water and groundwater samples to be validated to Stage 2A. The decrease in validation effort was not extended to air samples; however, 13 sample analyzed by TO15 were validated to Stage 2A. Please revise the TO15 validation for these samples to Stage 2B and validate sufficient additional samples to Stage 4 so the 10% criterion is met.

EDD Review

- 1. The results table had two records where the detect_flag_fod="D", but the result_reported was less than the sample_quantitation_limit (SQL). Sample VER-01D-C-08-AIR for styrene has a result of 0.47 ug/m3 compared to an SQL of 0.48 ug/m3. Sample VER-01D-C-12-AIR for carbon disulfide has a result of 0.83 ug/m3 compared to an SQL of 0.85 ug/m3. Both records have a final_validation_qualifier of "J" and a reason code of "sp", which is defined as ">SQL and <PQL". Please correct each record so the information is consistent within the record.
- 2. The validation_flag field in the results table has entries of "Y" and should be updated to "T" (true) to be consistent with the current EDD Guidance document.