



October 30, 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: *Revised Data
Validation Summary Report and Electronic Data Deliverable Vacuum Enhanced
Recovery Treatability Study*

Dated: October 15, 2018

Dear Mr. Steinberg,

The NDEP has received and reviewed the Trust's above-identified Deliverable and finds that the document is acceptable with the following comments noted for the Administrative Record:

1. Please add bias to the holding time qualification for chloroform in sample VER-01D-35.0-20171020.

***NERT Response:** Per the 2017 National Functional Guidelines "If aqueous samples are not properly preserved and are analyzed outside of the technical holding time of 7 days, qualify detects as estimated (J) and non-detects as unusable (R)". No change is required.*

NDEP/Neptune Response: The footnote to Tables 2 and 16 indicates that bias can be added to the qualifier, but that caution should be used to do so. No revision is requested, but in the future, please include a statement indicating the validator's professional judgment to add/withhold bias in the qualification.

Please contact the undersigned with any questions at wdong@ndep.nv.gov or 702-486-2850 x252.

Sincerely,

Wei-quan 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
Frederick Perdomo, AG Office
Gary Carter, Endeavour
George Crouse, Syngenta Crop Protection, Inc.
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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
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Michael Long, Hargis +
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