



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

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

November 26, 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 Semi-Annual Remedial Performance Sampling, January through
June 2018 (Reversion 0) and Associated EDD*

Dated: October 5, 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 01/30/2019** 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 Loffman, lepetomane
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.
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 +
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
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Steve Clough, Nevada Environmental Response Trust
Steven Anderson, LVVWD
Tanya O'Neill, Foley & Lardner L
Todd Tietjen, SNWA

Attachment A

DVSR Review:

1. **Section 1.0, first paragraph:** The samples table contains 815 samples but the text states there are 814 samples. Please determine which is correct and edit the text or samples table, as necessary.
2. **Section 1.0, analysis list:** The text lists methods 200.8, 7470A and 1664, but these analyses do not appear in the EDD. Please correct the method list or EDD as necessary.
3. **Section 1.0, sensitivity, page 10:** The text states that the laboratory is required to report detects to the MDL and that the laboratory uses a formatter to report the results to the MDL; however, as per the text in the preceding sentences, these results are actually reported to the SQL. Please revise replace MDL with SQL in these two sentences.
4. **Section 4.2.1, mercury holding time:** As mercury was not analyzed, it is not necessary to list the holding time in this section. As other edits are requested, please delete the reference to mercury in this section.

EDD Review

1. NDEP will update the DVSR and EDD guidance on the multiple results. It will have following language: The Multiple results can be reported for a single analyte for several reasons: dilutions to report analytes within the linear range of the calibration, results reported with QC sample outliers can be reanalyzed beyond the holding time and both results are reported, and analytes can be reported from two different methods (e.g., SW-846 8260 and 8270). In cases where more than one result is reported for an analyte in a sample, all results, including the validation qualifiers and reason codes (which may be “R” or “DNR”), are to be provided in the electronic data deliverable and will be uploaded into the BMI database. When these data are used for decision making, the end user should document the professional judgment used to choose the appropriate result. Please revise DVSR and EDD to follow this latest update.
2. A final_validation_reason_codes of “orr, nd” may be updated to a final_validation_qualifier of “U” and a final_validation_reason_codes of “nd”.