



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

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

December 19, 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 Soil Background Concentration Study

Dated: December 11, 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 02/19/2019** 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
Carrie Hunt, 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, NDEP
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, analysis list:** Radium-226 (Method 903.0) and radium-228 (Method 904.0) are missing from the list of methods/analytes. Please update the list to include these.
2. **Section 1, references:** Please note that the July 13, 2018 Data Validation Guidance letter encompasses all previous data validation guidance, including blank qualification. Older NDEP data validation guidance need not be cited.
3. **Sections 2.1.8, 3.1.5, Stage 4 validation:** The text in these sections indicates that all results for samples validated at Stage 4 were detects above the SQL; however, many of the results for Stage 4 samples were non-detects. Please verify that all sample results – detects and non-detects – were verified to be correctly calculated and consider rewording these sentences to correctly convey what was done in the validation process.
4. **Sections 4.1.6, 4.2.2, 5.1.5 and Attachment C:** The references cite MARLAP for the evaluation of QA/QC criteria, but based on the text in Sections 4.1.6, 4.2.2, 5.1.5 and Attachment C, field duplicate results are assessed using static RPDs and method blank results are assessed as metals/wet chemistry analytes as opposed to the evaluation methods suggested in Appendix C of MARLAP. Please explain which MARLAP criteria are used, which are not, and the reason for these choices.
5. **Sections 4.3 and 5.3, MDC:** While the validation guidance used to (incorrectly) refer to the minimum detectable concentration as the minimum detectable activity, this terminology has been updated. Please replace “minimum detectable activity (MDA)” with “minimum detectable concentration (MDC).”
6. **Sections 4.2.2, 4.5, 5.1.5 and 5.5:** As there is no PQL for radionuclides, the final paragraph of Sections 4.2.2/5.1.5 and the final sentence of Sections 4.5/5.5 are not applicable and should be removed or revised.

EDD Review

1. There are no comments for the EDD “NERT 2018-1811 EDD Rev 0.mdb”.