



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

Steve Sisolak, Governor
Bradley Crowell, Director
Greg Lovato, Administrator

May 28, 2019

Jay A. Steinberg
Nevada Environmental Response Trust
35 East Wacker Drive, Suite 690
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 NERT Athens Well Field Capture Evaluation and Zero-Valent Iron Treatability Study, Revision 0*

Dated: April 19, 2019

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 7/28/2019** 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:

Jeffrey Kinder, Deputy Administrator NDEP
Frederick Perdomo, Deputy Administrator NDEP
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
Gary Carter, Endeavour
George Crouse, Syngenta Crop Protection, Inc.
Greg Kodweis, SNWA
Harry Van Den Berg, AECOM
Jay Steinberg, Nevada Environmental Response Trust
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Joe Kelly, Montrose Chemical Corporation of CA
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John Edgcomb, Edgcomb Law Group
John Pekala, Ramboll Environ
Kelly McIntosh, GEI Consultants
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
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Steven Anderson, LVVWD
Tanya O'Neill, Foley & Lardner L
Todd Tietjen, SNWA

Attachment A

General Comments NDEP noticed that many minor issues had been commented in the DVSR and EDD reports and some of them were repeated more than once. NDEP suggests that NERT avoid these minor issues in future deliverables.

DVSR Review:

1. **Section 1.0, Precision and Accuracy of Environmental Data:** In the third paragraph, please also cite the NDEP validation guidelines as the basis for validation.
2. **Section 3.4 and 5.4, completeness:** Please separate the completeness for the wet chemistry completeness by method.
3. **Section 3.2.1, pH holding time:** In the EDD there are 45 pH results qualified "HF" by the laboratory that are not qualified as having an exceeded holding time. Please confirm these results should not be qualified.

EDD Review

1. This EDD has the same filename and dvsr_id as the EDD for NERT Semi-annual 2H2018. Both have file names of "NERT 1903 EDD Rev 0. accdb" and dvsr_id="NERT 1903". Each EDD should have a unique file name and dvsr_id because these are used to distinguish data in the database. For now, the EDD has been renamed to "NERT 1903 EDD AWF Rev 0.accdb" with a dvsr_id of "NERT 1903 AWF". If you would like a different unique name, please provide the filename and dvsr_id you would prefer to use.
2. Note the standardized name for the following parameters:

Current EDD parameter	Standardized parameter	Standardized parameter_id
Iron, Ferrous	Ferrous Iron	7439-89-6 [2+]
Iron, Ferric	Ferric Iron	7439-89-6 [3+]

3. There are records in the results table where the associated matrix is SO (soil) and the result_units are mg/L or ug/L. As this creates a matrix/units mismatch in the database, please change the analytical method to include "soluble," as this would provide sufficient information to verify the units are correct.
4. The filtered_flag field should be populated with "TOTAL" or "DISSOLVED" per the revised EDD Guidance. This field will be updated during file upload if a revised EDD is not required for other reasons.