



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

**STATE OF NEVADA**  
Department of Conservation & Natural Resources  
Steve Sisolak, Governor  
Bradley Crowell, Director  
Greg Lovato, Administrator

May 30, 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 and EDD (DVSR ID: TetraTech-M11-2019) for Seep Well Field Area  
Bioremediation Treatability Study, Revision 0*

Dated: May 6, 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 07/30/2019** 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](mailto: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  
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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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Kyle.Hansen, Tetrattech  
Lee Farris, BRC  
Marcia Scully, Metropolitan Water District of Southern California  
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Michael J. Bogle, Womble Carlyle Sandridge & Rice, LLP  
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Nicholas Pogoncheff, PES Environmental, Inc.  
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Steven Anderson, LVVWD  
Tanya O'Neill, Foley & Lardner L  
Todd Tietjen, SNWA

## Attachment A

### DVSR Review:

1. **Section 1.0, sample number:** The last sentence of the first paragraph indicates there are a total of 866 samples assessed in this DVSR; however, the EDD has a total of 890 samples. Please revise either the text or EDD to resolve this inconsistency.
2. **Table 1, pH:** There are 7 pH results by Method 9045C with a validation\_flag of "F." Please confirm these results were not validated.
3. **Table 1, analyte names:** In table 1, phosphorous is denoted as "Phosphorus, Total"; however, in the EDD it is "Phosphorus." As the name in the table contains more information, please revise the EDD for consistency.

### EDD Review

1. In the samples table, the records associated with location\_id="COH-2B1" are missing the sample\_top\_depth, sample\_bottom\_depth, litho, and hydro entries.
2. In the results table, there are records with analytical\_suite of "NTOTAL" and "SM4500-H+", which are not in Appendix E of the current EDD Guidance. These records should have an analytical\_suite="GENERAL". However, we will accept the analytical\_suite entries of "Microbial" and "Physical Properties" because these are new categories under this field.
3. There are records in the results table for Total Dissolved Solids 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. There are records in the results table where the detect\_flag\_fod and the detect\_flag\_ra do not match each other and these records are not for radionuclides. These two detect\_flag fields should be the same unless analytical\_suite="RADS".