



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

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

May 31, 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 (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 07/07/2019** 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:

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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.
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Kirsten Lockhart, Neptune & Company Inc.
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Kyle Gadley, Geosyntec
Kyle.Hansen, Tetrattech
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Marcia Scully, Metropolitan Water District of Southern California
Maria Lopez, Water District of Southern California
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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.
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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".