



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

**STATE OF NEVADA**  
Department of Conservation & Natural Resources

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

October 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 and EDD for Dioxin Impacted Soil Removal Action & Zero-Valent Iron Treatability Study, Modification No. 5 September 2018 through April 2019*

Dated: September 17, 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 **December 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](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  
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  
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  
John Solvie, Calrk County Water Quasslity  
Kelly McIntosh, GEI Consultants  
Kirk Stowers, Broadbent & Associates  
Kirsten Lockhart, Neptune & Company Inc.  
Kim Kuwabara, Ramboll Environ  
Kurt Fehling, The Fehling Group  
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  
Ranajit Sahu, BRC  
Richard Pfarrer, TIMET  
Rick Kellogg, BRC  
R9LandSubmit@EPA.gov  
Steve Clough, Nevada Environmental Response Trust  
Steven Anderson, LVVWD  
Tanya O'Neill, Foley & Lardner L  
Todd Tietjen, SNWA

## Attachment A

### DVSR Review:

1. **Section 8.2.2.1, TPH method blank:** Two detects above the PQL were qualified as estimated but had no bias assigned. Please add bias or explain why it was not used.
2. **Section 9.1.6, dioxin matrix interference qualifications:** Text in this section indicates that 44 results were qualified for matrix interference. 47 results in the EDD were qualified and had a reason code of "o." Please investigate this discrepancy and revise either the text or the EDD.
3. **Section 9.2.2, dioxin blank qualifications:** Please explain why a 5× rule is used for dioxin qualifications when a 2× rule is used for the other organic analytes.
4. **Section 11.1.7, wet chemistry Stage 4 counts:** The Stage 4 validation sample counts for TOC, ignitability and anions do not match the EDD. Please investigate these discrepancies and revise either the text or the EDD.

### EDD Review

1. Please provide the following information and verifications for the obsolete samples.
  - a. Verify that the four samples in table "obsolete\_samples" should have all dioxin data removed from the database.
  - b. Provide the DVSR/EDD for sample SSAK-05-0BPC.
  - c. Verify that the samples marked as "obsolete" in the samples and results tables should not be uploaded into the database.