



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

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

June 10, 2020

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 Electronic Data Deliverable, Las Vegas Wash Zero-Valent Iron Treatability Study*

Dated: May 7, 2020

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 08/10/2020 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,

Song Weiquan

Weiquan Dong, P.E.
Bureau of Industrial Site Cleanup
NDEP-Las Vegas City Office

WD:cp

EC:

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Carlton Parker, NDEP BISC Las Vegas
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Andrew Steinberg, Nevada Environmental Response Trust
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Dan Pastor, P.E. TetraTech
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Todd Tietjen, SNWA

Attachment A

DVSR Review:

1. **Section 1.0, sample count:** The text states there are 40 environmental and QC samples; however, the EDD has 41 “NORM” samples and 7 QC samples and Table 1 has 30 environmental samples and 11 QC samples. Please correct these discrepancies. (Also, please note that, as written, “40 environmental and quality control samples” implies a total of 40 samples.)
2. **Section 1.0, laboratories:** The text states that the samples were analyzed by Eurofins and Pace. The “lab_id” field in the EDD also lists “LLI.” If this was not a Pace or Eurofins subcontract laboratory, it should be identified in the text.
3. **Section 1.0, methods and analytes:** The ferrous iron method is identified as SM 3500 -FE D in the text but is reported only as SM 3500 in the EDD. The text states that the analyte reported by the Llyod Kahn method is total organic carbon; however, the EDD reports this analyte only as carbon (if the text is corrected, please note that total organic carbon is referenced in several locations in the text.). Please correct these discrepancies.
4. **Table II, footnotes:** The “-“ symbol is identified as not applicable to Stage 2A validation in all footnotes, including the table presenting only Stage 2B requirements (page 24 of the PDF). This specific instance should be revised to define the symbol as not applicable to Stage 2B validation.
5. **Section 4.2.1, holding times:** Please check the holding times for nitrate. When reported on its own (i.e., not as nitrate/nitrite), the aqueous method holding time is 48 hours instead of 28 days.
6. **EDD, calibration range exceeded:** There are 10 results for chloride and sulfate with laboratory “E” qualifiers. This usually indicates the result was reported above the linear range of the calibration. Should these results have been qualified during validation?

EDD Review

1. 6 records with matrix *WG* are missing entry in field *litho*. Sample ID: ZTS-MW113-20191203, ZTS-MW113-20191206H2, ZTS-MW114-20191206, ZTS-MW114-20191206H2, ZTS-MW115-20191206, ZTS-MW115-20191206H2. Please add this information if it is available