



January 20, 2021

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: *Quality Assurance Project
Plan, Revision 6*

Dated: December 10, 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 **03/19/2021** based on the following comments. The Trust should additionally provide an annotated response-to-comments letter as part of the revised Deliverable.

1. Specific Comment #1 Appendix B: The folder that contains the provided electronic documents does not contain Quality Assurance Manuals (QAMs) for the following laboratories listed in section 1.4.4 Analytical Laboratories:

- Pace National Las Vegas, NV
- Geotechnical and Environmental Services, Inc
- PTS Laboratories, Inc
- Microbial Insight, Inc

It is recommended that a table be added that lists all of the laboratories, Quality Assurance Manuals (Title and date of the version submitted for review), and a location of the document, and update the Appendix B folder by adding the missing QAMs.

2. Specific Comment # 2 Table 1 and Appendix C: A sample of submitted electronic copies of SOPs saved in folder Appendix C was reviewed against the information provided in Table 1 Analytical Methods and Laboratories. The following discrepancies were observed:

- Some SOP dates in Table 1 are for older versions than those stored in the Appendix C folder
- Several SOPs that are listed in Table 1 are not available in the Appendix C folder
- Some SOPs that are stored in the Appendix C folder are not listed in Table 1.

It is recommended that Table 1 be updated to ensure that it matches current laboratory SOP status, and review and update Appendix C to assure that recent revisions of all SOPs listed in Table 1 are available in electronic copy.

Please contact the undersigned with any questions at wdong@ndep.nv.gov or 702-668-3929.

Sincerely,



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

WD:cp

EC:

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Allan Delorme, Ramboll Environ
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Andrew Steinberg, Nevada Environmental Response Trust
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Chuck Elmendorf, Stauffer Management Company, LLC
Dan Pastor, P.E. TetraTech
Dave Share, Olin
Dave Johnson, LVVWD\
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Derek Amidon, Tetrattech
Ebrahim Juma, Clean Water Team
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Kelly McIntosh, GEI Consultants
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