



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

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

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

April 12, 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: *Baseline Ecological Risk  
Assessment and Phase 3 Remedial Investigation Modification #7 DVSR and EDD*

Dated: February 16, 2021

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 06/12/2021** 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 702-668-3929.

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  
Steve Linder, U.S. Environmental Protection Agency, Region 9  
Allan Delorme, Ramboll Environ  
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 Rakvica, Syngenta  
Brian Waggle, Hargis + Associates  
Carol Nagai, MWDH<sub>2</sub>O  
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\  
Debbie Maust. Cap-Az  
Derek Amidon, Tetrattech  
Ebrahim Juma, Clean Water Team  
Ed Modiano, de maximis, inc.  
Eric Fordham, Geopentech  
Gary Carter, Endeavour  
Jay Steinberg, Nevada Environmental Response Trust  
Jeff Gibson, Endeavour  
Jill Teraoka, MWDH<sub>2</sub>O  
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  
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Kirk Stowers, Broadbent & Associates  
Kirsten Lockhart, Neptune & Company Inc.  
Kim Kuwabara, Ramboll Environ  
Kurt Fehling, The Fehling Group  
Kyle.Hansen, Tetrattech  
Lee Farris, BRC  
M. Santos, NWDH  
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.  
Peggy Roefer, CRC  
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## Attachment A

### DVSR Review:

1. Section 2.1.3 – Please clarify why all chloroform non-detects within the batch are not qualified for the low recovery in the matrix spike. The Flag column in the Table in Section VIII of Appendix A indicates “All non-detects” are flagged UJ. The only associated sample listed is the parent sample.
2. Section 8.1.3 – There are two methods used for analysis of total organic carbon, Lloyd Kahn and SW9060. When using “TOC” alone within the DVSR it is difficult to determine which method is being discussed. Please add a reference to which method is affected by the QC exceedances for TOC. Also, the EDD uses a different “parameter” for each method. “Carbon” is used for Lloyd Kahn method and “Total Organic Carbon” is used for SW9060. Please clarify and confirm that “Carbon” is the correct parameter and not “Total Organic Carbon”

### EDD Review

File “NERT 2006 EDD Rev 0.accdb”

1. In the samples table, the matrix “WP” is not in the matrix code list in Appendix B of the EDD Guidance. Check Appendix B to see if this sample is represented by any matrix code in the list. If not, please define the “WP” matrix.
2. In the results table, there are 68 results for Acrolein where result\_reported is NULL. All of the detect flags are “U” indicating the results are all non-detected concentrations and should be set equal to the SQL per EDD Guidance. Also note that these Acrolein results are reported as TICs. A result\_reported should be provided for these records.
3. In the results table, there are 2 results for “%SOLIDS” and 17 results for “Moisture Content” that are reported in “% by wt (dry)”. Please verify the correct units for these records. The lab reports and all other results for these parameters are reported in “%”.