



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

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

September 16, 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: *Data Validation Summary
Report Annual Remedial Performance Sampling January through June 2020*

Dated: January 5, 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 **11/16/2021** 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 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
Allan Delorme, Ramboll Environ
Andrew Barnes, Geosyntec
Andrew Steinberg, Nevada Environmental Response Trust
Anna Springsteen, Neptune & Company Inc.
Betty Kuo Brinton, M Metropolitan Water District of Southern California
Brian Waggle, Hargis + Associates
Brian Loffman, Nevada Environmental Response Trust

Brian Rakvica, Syngenta
Carol Nagai, Metropolitan Water District of Southern California
Carrie Hunt, Olin Corporation
Chris Ritchie, Ramboll Environ
Christine Klimek, City of Henderson
Chuck Elmendorf, Stauffer Management Company, LLC
Dan Pastor, P.E. TetraTech
Dave Share, Olin
Dave Johnson, LVVWD
Derek Amidon, Tetrattech
Ebrahim Juma, Clean Water Team
Ed Modiano, de maximis, inc.
Eric Fordham, GeoPentech
Gary Carter, Endeavour
Greg Kodweis, SNWA
Jay Steinberg, Nevada Environmental Response Trust
Jeff Gibson, Endeavour
Jill Teraoka, Metropolitan Water District of Southern California
Joanne Otani, The Fehling Group
Joe Kelly, Montrose Chemical Corporation of CA
Joe Leedy, Clean Water Team
John Edgcomb, Edgcomb Law Group
John Pekala, Ramboll Environ
John Solvie, Clark County Water Quality
Kathrine Callaway, Cap-AZ
Kelly McIntosh, GEI Consultants
Kirk Stowers, Broadbent & Associates
Kirsten Lockhart, Neptune & Company Inc.
Kim Kuwabara, Ramboll Environ
Kurt Fehling, The Fehling Group
Lee Farris, BRC
Marcia Scully, Metropolitan Water District of Southern California
Maria Lopez, Metropolitan Water District of Southern California
Mark Duffy, U.S. Environmental Protection Agency, Region 9
Mark Paris, Landwell
Mauricio Santos, Metropolitan Water District of Southern California
Michael J. Bogle, Womble Carlyle Sandridge & Rice, LLP
Michael Long, Hargis +
Mickey Chaudhuri, Metropolitan Water District of Southern California
Nicholas Pogoncheff, PES Environmental, Inc.
Nicole Moutoux, U.S. Environmental Protection Agency, Region 9
Orestes Morfin, CAP
Paul Black, Neptune and Company, Inc.
Peggy Roefer, CRC
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Steven Anderson, LVVWD
Steve Armann, U.S. Environmental Protection Agency, Region 9
Tanya O'Neill, Foley & Lardner L
Todd Tietjen, SNWA
William Frier, U.S. Environmental Protection Agency, Region 9

Attachment

DVSR Review:

1. 4.0 Metals – DVSR states there are 724 chromium results. The EDD shows 730 results. Please provide reason for the difference.
2. 5.0 Wet Chemistry – DVSR states there are 678 anion results. The EDD shows 691 results (one nitrate result as DNR) and the Completeness Table in 7.4 shows 690 results. Please provide reason for the difference.
3. Table III – Stage 2a Validation Stage Percentages; The total results for anions is 678, the EDD shows 691 results (one nitrate result as DNR). The total results for chromium is 724. The EDD shows 730 results. Please provide reason for the difference.

EDD Review

File “NERT 2005 EDD Rev 0.accdb”

1. In the samples table, samples MW-02-20200521, MW-20-20200521, and MW-25-20200521 have matrix=WG, but do not have an entry for “litho”. Provide the litho for these samples or a reason that litho was not provided.