



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

Steve Sisolak, *Governor*
James R. Lawrence, *Acting Director*
Greg Lovato, *Administrator*

August 4, 2022

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: *Combined DVSR
and EDD, Revision 0 for Annual Groundwater Monitoring and GWETS Performance
Report July 2020 – June 2021 performance period*

Dated: May 27, 2022

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 **10/04/2022** 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:
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Dan Pastor, P.E. TetraTech
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Attachment A

DVSR Review:

1. Attachment A VOC – Field Blanks – Not all samples in the EDD have the final reason code of “bf” for the affected samples. Only the first sample in the exceptions list contains the “bf” code. Please explain the discrepancy.
2. Attachment A VOC – Surrogates –The table indicates “All analytes” are flagged with reason code “s”. Does this indicate all analytes in the VOC list or only analytes associated with the surrogate? Please explain the discrepancy.
3. General comment for clarification: The EDD lists all the applicable final reason codes that affect the sample. Are these codes listed in order of hierarchy? If so,
 - 1.a. Section 3.2.1 – Preservation – Qualifiers as “J-” or “UJ” – EDD Sample PC-56-20210507 flagged as “J” with no negative bias. Since vial headspace (vh) flag is listed first in EDD should this be “J-” as stated in the DVSR?
 - 1.b. Section 3.2.2.2 – Trip Blank – Qualifiers as “J” – EDD Sample MC-53-20210429 flagged as “J+”. Since trip blank (bt) flags are listed first in the EDD should this be “J” as stated in the DVSR?

The hierarchy listed in Section 1.0 gives the “J” flag priority over “J+” and “J-” because direction cannot be determined. Please verify the final flag for the two samples listed above.

4. Section 5.1.2 – Matrix Spike – Chlorate – Qualifiers DVSR Total: 178 – EDD Total: 154. Please explain the discrepancy. The MS/MSD RPD (m,ld) Flag totals appear to be correct.
5. Section 5.1.2 – Matrix Spike – Nitrate as Nitrogen – Qualifiers DVSR Total: 64 – EDD Total: 52. Please explain the discrepancy. The MS/MSD RPD (m,ld) Flag totals appear to be correct.
6. Sample Receipt: There are several coolers (19) received at elevated temperatures by the Lab. This appears to be happening on a continuing basis. There is no information available to determine which samples were in the cooler with elevated temperatures (unless only one cooler was submitted that day). Unless there are field notes recording cooler sample inventory, there is no way to establish sample traceability to the cooler. Example, SDG 550-162775 – 5 coolers were submitted to the lab and received with temperature readings of 1.3, 1.3, 1.6, 2.1 and 24.8 degrees C. On first appearance, it is inconceivable that one cooler was received at 24.8 supposedly to have ice present with the other four clearly able to reach acceptable temperature range. The COC is 8 pages with no indication which samples were in each cooler. All samples were collected on 4/28/2021 and delivered by hand(?) to the lab. The samples were received by “DCS” then relinquished to a drop box. Was anyone there to record the cooler temperatures on 4/28/21? If not, the temperatures were collected on

4/29/2021 the following morning when the technician officially received the coolers into the lab, see COC, Case Narrative and Login Sample Receipt Checklist. The checklist was generated on 4/29/2021 at 8:40am. Certainly, there would have been enough time for the cooler to cool down overnight.

Please verify the cooler temperatures were in fact recorded on 4/28/2021 at the lab and at the time of drop-off to confirm that coolers did not have time to cool. Otherwise, the method for preserving samples on ice should be reviewed. General Note: Each cooler should have its own COC for sample traceability to the cooler.

EDD Review

File "NERT 2102 EDD Rev 0.accdb"

1. The EDD is acceptable.