



NEVADA DIVISION OF  
**ENVIRONMENTAL  
PROTECTION**

STATE OF NEVADA  
Department of Conservation & Natural Resources

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

December 8, 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 *Data Validation*  
*Summary Report, Indoor Air Quality Investigation, March through May 2022*

Dated: October 18, 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 **02/08/2023** based on the comments. 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  
Alan Pineda, NDEP BISC Las Vegas  
Andrew Barnes, Geosyntec  
Andrew Steinberg, Nevada Environmental Response Trust  
Anna Springsteen, Neptune & Company Inc.  
Betty Kuo Brinton, 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  
Chris Ritchie, Ramboll  
Christine Klimek, City of Henderson  
Chuck Elmendorf, Stauffer Management Company, LLC  
Dan Pastor, P.E. TetraTech  
Dan Petersen, Ramboll  
Dane Grimshaw, Olin  
Daniel Chan, SNWA  
Darren Croteau, Terraphase Engineering, Inc.  
Dave Share, Olin  
Dave Johnson, LVVWD  
Derek Amidon, TetraTech  
Ebrahim Juma, Clean Water Team  
Ed Modiano, de maximis, inc.  
Eric Fordham, GeoPentech  
Gary Carter, Endeavour  
Jay A. 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-Paul Rossi, Stauffer Management Company LLC  
John Solvie, Clark County Water Quality  
Karen Gastineau, Broadbent & Associates  
Kathrine Callaway, Cap-AZ  
Kelly McIntosh, GEI Consultants  
Kirk Stowers, Broadbent & Associates  
Kirsten Lockhart, Neptune & Company Inc.  
Kim Kuwabara, Ramboll  
Kurt Fehling, The Fehling Group  
Laura Dye, CRC  
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  
Melanie Hanks, Olin  
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, CA  
Paul Black, Neptune & Company  
Peter Jacobson, Syngenta  
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Steve Clough, Nevada Environmental Response Trust  
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 A**

### **DVSR Review:**

1. The case narratives for the water samples indicate that cooler temperatures are above 6 degrees Celsius for 5 of 7 SDGs. There are two temperature readings on 6 of 7 COCs. Why are there two readings and which one is correct? The Lab's Login Sample Receipt Checklist does not identify cooler temperatures above the acceptable range. This has been discussed before and the lab was to revise how the erroneous value was used in their reports. The appearance is that samples are taken in the morning and not put on ice until ready to be shipped in the afternoon. Then possibly the shipper collects their own temperature prior to or after shipping to the lab/drop-off point. Then the next morning the cooler is officially received in the lab within acceptable temperature range.

The appearance is that the lab is receiving multiple coolers for each of the SDGs where one cooler would be sufficient to contain all samples. Please explain where this higher temperature reading comes from and why it is not reported in the Login Sample Receipt Checklist.

### **EDD Review**

File "NERT 2204 EDD Rev 0.accdb"

1. This EDD is acceptable.