



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

Joe Lombardo, Governor
James A. Settelmeyer, Director
Jennifer Carr, Administrator

June 17, 2024

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: *Screening-Level Health Risk Assessment for 8th Street DVSR and EDD – September 2022, Revision 1*

Dated: January 9, 2024

Dear Mr. Steinberg,

The NDEP has reviewed the above-identified Deliverable and provides comments in Attachment A. A revised Deliverable should be submitted by **August 17, 2024** based on the comments found in Attachment A.

Please contact the undersigned with any questions at alan.pineda@ndep.nv.gov or 702-668-3925.

Sincerely,

Alan Pineda, P.E.
Bureau of Industrial Site Cleanup
NDEP-Las Vegas City Office

EC:

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Esther Franco, NDEP BISC Las Vegas
Aaron Welch, Central Arizona Project
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Andrew Steinberg, Nevada Environmental Response Trust
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Dana Grady, Tetra Tech
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Daniel Chan, Southern Nevada Water Authority
Danielle E. Greene, Colorado River Commission of Nevada
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Marcia Scully, Metropolitan Water District of Southern California
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Paul Black, Neptune & Company, Inc.
Peter Jacobson, Syngenta

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Weiquan Dong, Southern Nevada Water Authority
William Carson, Terraphase Engineering
William Frier, U.S. Environmental Protection Agency, Region 9
Zeitel Senitz, de maximis inc.

Attachment A

DVSR Review:

File "NERT 2303 DVSR Rev 1.pdf"

1. **NDEP Comment:** Attachment A, Section IV - Continuing Calibration, Benzoic acid and Hexachlorocyclopentadiene %D are greater than 20%. There is no indication of low or high recovery of the continuing calibration relative to the spike level. Non-detect results for Benzoic acid are qualified as estimated, UJ, whereas non-detect results for Hexachlorocyclopentadiene are not qualified as estimated, UJ. Please explain the discrepancy.

NERT Response: The continuing calibration verification (CCV) recovery was low for benzoic acid and non-detect results were qualified "UJ" as estimated non-detect. The recovery for hexachlorocyclopentadiene was high for the CCV and the analyte was not detected in any of the associated samples; therefore, non-detect results were not qualified for a potential bias. Therefore, no changes to the DVSR are required.

NDEP Response: The NERT response does not address the comment. In section 3.1.1, second paragraph, there is no direction of bias mentioned to confirm the reason why no qualifiers are applied. Please include the direction of bias (low or high). In section 3.1.1, third paragraph, there is no direction of bias mentioned to confirm the reason to qualify benzoic acid results as UJ and no qualification for hexachlorocyclopentadiene. Please include the direction of bias (low or high) as the reason for qualifying, or not qualifying results.

Similarly, no bias is indicated in Appendix B, Section IV. Continuing Calibration. Please include the bias for confirmation.

2. **NDEP Comment:** Attachment H, Section II – Initial Calibration and Initial Calibration Verification – There is no indication of low or high recovery of the ICV. Example, Demeton-O recovery is 103.6% and Demeton-S recovery is 87.8%, both are greater than 20%. However, Demeton-O receives no flagging while Demeton-S receives a qualifier UJ for affected results. Both ICV recoveries appear to be positive or high recovery. Please explain why some results are qualified and others are not qualified. Methyl parathion ICV percent difference is >20%. The appearance is the ICV was recovered high. Should the results for methyl parathion be qualified as UJ when the recovered amount in the ICV is higher than the spike level?

NERT response: The recoveries for Demeton-O were high and the recoveries for Demeton-S were low; therefore all non-detect results for total Demeton (Demeton-O + Demeton-S) were qualified "UJ" as estimated non-detect. The recovery for methyl parathion was low for the ICV; therefore the associated non-detect results were qualified "UJ". Therefore, no changes to the DVSR are required.

NDEP Response: The NERT response does not address the comment. Similar to the discussion above Please include the direction of bias. The percent difference does not indicate if the recovery was low or high. Please include discussion regarding the nature of the outlier, whether the percent difference is a result of a low or high recovery of the analyte in the ICV.

EDD Review

File "NERT 2303 EDD Rev 1.accdb"

This EDD is acceptable.