

September 19, 2007

Susan Crowley
Tronox LLC
PO Box 55
Henderson, Nevada 89009

Re: **Tronox LLC (TRX)**
NDEP Facility ID #H-000539
Nevada Division of Environmental Protection Response to:
Data Validation Summary Report (DVSR) for the *TRONOX Annual Performance Report for Chromium and Perchlorate, Henderson, Nevada July 2006 to June 2007*.
Dated August 28, 2007

Dear Ms. Crowley,

The NDEP has received and reviewed TRX's Data Validation Summary Report (DVSR) identified above and provides comments in Attachment A. A revised DVSR should be submitted based on the comments found in Appendix A by **October 18, 2007**. TRX should additionally provide an annotated response-to-comments letter as part of the revised DVSR.

Please contact the undersigned with any questions at (702) 486-2850 x 240 or sharbour@ndep.nv.gov.

Sincerely,

Shannon Harbour, P.E.
Staff Engineer III
Bureau of Corrective Actions
Special Projects Branch
NDEP-Las Vegas Office

SH:sh

CC: Jim Najima, NDEP, BCA, Carson City
Brian Rakvica, NDEP, BCA, Las Vegas
Keith Bailey, 3229 Persimmon Creek Drive, Edmond, OK 73013
Sally Bilodeau, ENSR, 1220 Avenida Acaso, Camarillo, CA 93012-8727
Barry Conaty, Akin, Gump, Strauss, Hauer & Feld, L.L.P., 1333 New Hampshire Avenue, N.W.,
Washington, D.C. 20036
Brenda Pohlmann, City of Henderson, PO Box 95050, Henderson, NV 89009
Mitch Kaplan, U.S. Environmental Protection Agency, Region 9, mail code: WST-5,
75 Hawthorne Street, San Francisco, CA 94105-3901
Rob Mrowka, Clark County Comprehensive Planning, PO Box 551741, Las Vegas, NV, 89155-
1741
Ranajit Sahu, BRC, 311 North Story Place, Alhambra, CA 91801
Rick Kellogg, BRC, 875 West Warm Springs, Henderson, NV 89011
Mark Paris, Landwell, 875 West Warm Springs, Henderson, NV 89011
Craig Wilkinson, TIMET, PO Box 2128, Henderson, Nevada, 89009-7003
Kirk Stowers, Broadbent & Associates, 8 West Pacific Avenue, Henderson, Nevada 89015
George Crouse, Syngenta Crop Protection, Inc., 410 Swing Road, Greensboro, NC 27409
Nick Pogoncheff, PES Environmental, 1682 Novato Blvd., Suite 100, Novato, CA 94947
Lee Erickson, Stauffer Management Company, P.O. Box 18890, Golden, CO 80402
Chris Sylvia, Pioneer Americas LLC, PO Box 86, Henderson, Nevada 89009
Paul Sundberg, Montrose Chemical Corporation, 3846 Estate Drive, Stockton, California
95209
Joe Kelly, Montrose Chemical Corporation of CA, 600 Ericksen Avenue NE, Suite 380,
Bainbridge Island, WA 98110

Attachment A

1. Section 2.0, the DVSR indicates that the data were subject to limited data validation (i.e. Tier 2) due to the absence of complete data packages with raw data. The NDEP has the following comments:
 - a. The DVSR indicates that the limited data validation is consistent with the NDEP guidance on data validation of 2006. However, the NDEP guidance also requires at least 10% of the data to undergo full data validation – to the level of raw data. Thus, this data validation has not met the NDEP requirements.
 - b. TRX should request the full raw data reports from MWH for at least 10% of the data from this report and these data should then be validated as follows (where applicable) for inclusion in the DVSR:
 - i. 100% validation of Initial and Continuing Calibration,
 - ii. Random recalculation (10-20%) of reported results versus raw data, and
 - iii. 100% validation of Interference Check Sample (data reporting forms), ICP Serial Dilution (data reporting forms), Reporting Limits (ensure they include appropriate sample weights, moisture, dilution).
2. Section 3.7, the NDEP has the following comments:
 - a. The DVSR states that the nitrate results for the influent/effluent sample pair collected on 1/29/2007 were qualified and estimated due to the absence of a CCV. This is consistent with laboratory report SDG 194620; however, please note that the absent CCV also applies to nitrite in this SDG although the results were below the detection limits for this analyte.
 - b. The DVSR states that the samples were reanalyzed outside of the holding time with similar results as the original. However, this could not be confirmed since the analysis date and SDG for this reanalysis was not provided. Please provide the SDG under which the reanalysis was performed and include those laboratory reports in the report if they are not currently provided
3. Table E-3, the NDEP has the following comments:
 - a. Sample M – 36 (analyzed on 05/03/07 from laboratory report SDG 203591) in Table E-3 contains a discrepancy in the “DQI” column for Holding Time and then refers to the associated “DQI Result” as 108% RPD. Since the issue is holding time, an RPD value is not applicable. The “DQI Result” would normally be reported in days if the DQI issue was holding time. In addition, upon checking the SDG report from the laboratory there appears to be no problem with holding time. Please correct this discrepancy.
 - b. Samples from laboratory report SDG 203746 (ART-1 through ART - 8) were noted as qualified due to an exceedance of the TDS holding time requirement. The laboratory report stated that these samples were initially analyzed within holding time and re-analysis was outside the holding time. Additionally, the DVSR should include some indication of why these samples required reanalysis and whether similar results were obtained if the data are at all comparable. Please address these comments in the DVSR.
 - c. Laboratory report SDG 192802 shows the analysis for nitrate is slightly past the 1-day holding time. This sample was not included with those listed in the Table E-3. Please correct this discrepancy.