



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

March 24, 2008

Susan Crowley
Tronox LLC
PO Box 55
Henderson, Nevada 89009

Re: **Tronox LLC (TRX)**
NDEP Facility ID #H-000539
Nevada Division of Environmental Protection (NDEP) Response to:
Data Validation Summary Report (DVSR), Tronox Parcels C, D, R, and G Investigation,
November 2007, BMI Industrial Complex, Clark County, Nevada
Dated February 27, 2008

Dear Ms. Crowley,

The NDEP has received and reviewed TRX's DVSR identified above and provides comments in Attachment A. TRX should note that this DVSR was reviewed for completeness, rationality, accuracy of the text with the tables and a random crosscheck with laboratory reports. This review did not encompass 100% of the report but was a sampling of the laboratory reports and database against the tables provided in the report. Errata pages should be submitted based on the comments found in Appendix A. Please advise the NDEP regarding the schedule for this submittal. TRX should additionally provide an annotated response-to-comments letter as part of the submittal.

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

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, Environmental Answers LLC, 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
Michael Bellotti, Olin Corporation, 3855 North Ocoee Street, Suite 200, Cleveland, TN 37312
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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
Paul Black, Neptune and Company, Inc., 8550 West 14th Street, Suite 100, Lakewood, CO 80215
Dave Gratson, Neptune and Company, 1505 15th Street, Suite B, Los Alamos, NM 87544

Attachment A

1. Table 2-1, three Analysis Dates for laboratory sample F7K150237005, in Table 2-7, page 17 of 31 appears incorrect.
2. Database, the Analytical Method name "KWSR" is included in the database. This method is not included in Table 1-2. The report should clarify the name KWSR or correct the database.
3. Tables 2-9 and 2-10, a number of the values in the Limit column are incorrect. In some cases they appear to match the QL value, in other instances their origin is unclear. The values in the Limit column should show the maximum RPD, difference, or RER value that is acceptable.