



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 17, 2010

Matt Paque
Tronox LLC
3301 NW 150th
Oklahoma City, OK 73134

Re: **Tronox LLC (TRX)**
NDEP Facility ID #H-000539

Nevada Division of Environmental Protection (NDEP) Response to:
Tronox Response to Nevada Division of Environmental Protection (NDEP) 2-26-10
Comments Regarding: Tronox's Data Validation Summary Report, Phase B Investigation
Area III Soil, Tronox LLC, Henderson, Nevada Dated February 18, 2010
Dated: March 10, 2010

Dear Mr. Paque,

The NDEP has received and reviewed TRX's above-identified response-to-comments letter and based on this review finds that the *Phase B Investigation Area III Soil Data Validation Summary Report* (DVSR) dated February 18, 2010 is acceptable with the following comment noted for the administrative record:

- NDEP would find it helpful for future reviews of DVSRs if TRX could incorporate the additional details that were included in the response-to-comments letter for increased readability and transparency. For example, TRX stated in the Area III DVSR that no data were qualified (item 2), which doesn't convey anything about the conditions of the samples. By including "... no hold time or preservation deficiencies were found in association with this DVSR data submittal" and then stating "None of the Area III soil and SPLP sample data were qualified due to hold time and preservation exceedances.", the DVSR will be clear as to what was reviewed, if there were any potential problems, and the potential impact on data quality (if any).

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
Fax: 702-486-5733



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EC: Jim Najima, NDEP, BCA, Carson City
Brian Rakvica, NDEP, BCA, Las Vegas
Greg Lovato, Bureau of Corrective Actions, NDEP, Carson City, NV

CC: Keith Bailey, Environmental Answers LLC, 3229 Persimmon Creek Drive, Edmond, OK 73013
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