



# 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, 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:  
*Data Validation Summary Report, Phase B Investigation Groundwater, Tronox LLC,  
Henderson, Nevada*  
Dated: February 25, 2010

Dear Mr. Paque,

The NDEP has received and reviewed TRX's above-identified Deliverable and provides comments in Attachment A. A revised Deliverable should be submitted based on the comments found in Attachment A. Please advise the NDEP **by March 29, 2010** regarding the schedule for this resubmittal. TRX should additionally provide an annotated response-to-comments letter as an appendix to the revised submittal. Please contact the undersigned with any questions at [sharbour@ndep.nv.gov](mailto: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

SH:bar:sh

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  
Susan Crowley, C/O Tronox LLC, PO Box 55, Henderson, NV 89009



Mike Skromyda, Tronox LLC, PO Box 55, Henderson, NV 89009  
Michael J. Foster, Tronox LLC, P.O. Box 268859, Oklahoma City, OK 73126-8859  
Deni Chambers, Northgate Environmental, 300 Frank H. Ogawa Plaza, Suite 510, Oakland, CA 94612  
Barry Conaty, Holland & Hart LLP, 975 F Street, N.W. Suite 900, Washington, D.C. 20004  
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  
Ebrahim Juma, Planning Manager, Air Quality and Environmental Management, 500 S. Grand Central Pkwy, 1st floor, P.O. Box 555210, Las Vegas, NV 89155-5210  
Joe McGinley, McGinley & Associates, 815 Maestro Dr, Reno, NV 89511  
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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  
Curt Richards, Olin Corporation, 3855 North Ocoee Street, Suite 200, Cleveland, TN 37312  
Paul Sundberg, Montrose Chemical Corporation, 10733 Wave Crest Court, Stockton, CA 95209  
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Jeff Gibson, AMPAC, 3883 Howard Hughes Pkwy, Ste 700, Henderson, NV 89169  
Larry Cummings, AMPAC, 3883 Howard Hughes Pkwy, Ste 700, Henderson, NV 89169  
Dave Gratson, Neptune and Company, Inc., 1505 15<sup>th</sup> Street, Suite B, Los Alamos, NM 87544

Attachment A

1. EDD, NDEP has the following comments:
  - a. The units and values for the MDL, SQL, and PQL fields in the EDD need to be reviewed. For example, there are many *mdl\_pgl\_units* fields with a value of g/L. This is observed for all cyanide and most if not all metals values, yet these units seem unlikely. Please review and revise as necessary.
  - b. In some cases the SQL is much greater than the PQL; however, this may be related to the different units as the units for the SQL indicator are also not explicit in the EDD. TRX should clarify whether the SQL units are always equal to the *result\_units* field. Please note that this should be clarified in the DVSR as well.
  - c. Ideally, the EDD should identify the units for each DQI. Please revise as necessary.