



STATE OF NEVADA
Department of Conservation & Natural Resources
DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

July 6, 2010

Matt Paque
Tronox LLC
PO BOX 268859
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, Parcel "C", "D", "F", "G", and "H" Soil Confirmation, Tronox LLC, Henderson, Nevada
Dated: June 15, 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 **by July 21, 2010** based on the comments found in Attachment A. TRX should additionally provide an annotated response-to-comments letter as part of the revised Deliverable.

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

SH:sh

EC: Jim Najima, Bureau of Corrective Actions, NDEP
Greg Lovato, Bureau of Corrective Actions, NDEP
Mike Skromyda, Tronox LLC
Michael J. Foster, Tronox LLC
Keith Bailey, Environmental Answers LLC
Susan Crowley, Tronox LLC (Contractor)
Deni Chambers, Northgate Environmental



Brian Rakvica, McGinley and Associates
Barry Conaty, Holland & Hart LLP
Brenda Pohlmann, City of Henderson
Mitch Kaplan, U.S. Environmental Protection Agency, Region 9
Ebrahim Juma, Planning Manager, Air Quality and Environmental Management
Joe McGinley, McGinley & Associates
Ranjit Sahu, BRC
Rick Kellogg, BRC
Mark Paris, Landwell
Craig Wilkinson, TIMET
Kirk Stowers, Broadbent & Associates
Victoria Tyson, Tyson Contracting
George Crouse, Syngenta Crop Protection, Inc.
Nick Pogoncheff, PES Environmental
Lee Erickson, Stauffer Management Company
Michael Bellotti, Olin Corporation
Curt Richards, Olin Corporation
Paul Sundberg, Montrose Chemical Corporation
Joe Kelly, Montrose Chemical Corporation of CA
Jeff Gibson, AMPAC
Larry Cummings, AMPAC
Dave Gratson, Neptune and Company, Inc.

CC: Ebrahim Juma, Planning Manager, Air Quality and Environmental Management
Susan Crowley, C/O Tronox LLC, PO Box 55, Henderson, NV 89009
Lee Erickson, Stauffer Management Company

Attachment A

1. EDD Database, NDEP has the following comments:
 - a. General format comments, NDEP has the following comments:
 - i. The “result” table should be named "Results".
 - ii. validation_reason_code field in validation_reason table should be named final_validation_reason_code.
 - b. Please address the following comments:
 - i. There are 78 non-detect records where result_reported is null, this field should be populated with the SQL.
 - ii. There are 229 results which have a final_validation_qualifier but no reason code. These all appear to be non-detects, (results is < SQL, detect flag = F). This requirement for either both fields null or both fields populated is consistent with the latest EDD Guidance. Please add a new reason code that will apply to these true non-detects.
 - iii. There are 20 non-rad, non surrogate, non TEQ results where pql is null.
 - iv. sample_id_field P2-PF-1-1-0.0, which is found in the results table, is missing from the samples table.
 - v. location_id S3-PG-1-1, which is found in the samples table, is missing from the locations table.