



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, Shallow Supplemental Soil Sampling in Areas I and II.*  
*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](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:sh

EC: Jim Najima, Bureau of Corrective Actions, NDEP  
Greg Lovato, Bureau of Corrective Actions, NDEP  
Mike Skromyda, Tronox LLC  
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Keith Bailey, Environmental Answers LLC  
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Brian Rakvica, McGinley and Associates  
Barry Conaty, Holland & Hart LLP



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  
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Kirk Stowers, Broadbent & Associates  
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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. Table 1-5, this table is missing the holding time requirements for Perchlorate. Please revise.
2. EDD Database, NDEP has the following comments:
  - a. General format comments:
    - i. Clarify the difference between the results:Table and the resultsV4:Table.
    - ii. The validation\_reason table is missing.
    - iii. The field name "percent\_\_moisture" in the samples table has two underscores, this should be percent\_moisture.
  - b. Please address the following:
    - i. Results and Samples Tables, sample\_id\_field EB121109-SO-A1 found in results table is missing from samples table
    - ii. The results:Table has 4478 results where validation\_stage is null, this is not the case for the resultsV4:Table.
    - iii. In the results:Table, the final\_validation\_reason\_code and final\_validation\_qualifier are always null, this is not the case for the resultsV4:Table.
    - iv. For both the results:Table and the resultsV4:Table, there are 103 results where sql and pql are null
    - v. For both the results:Table and the resultsV4:Table, there are 77 non-detect results have null result values
    - vi. There are many 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. We suggest a new reason code be added that will apply to these true non-detects.