



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 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
Deni Chambers, Northgate Environmental
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
Joe McGinley, McGinley & Associates
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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. 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.