

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 28, 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: Revised Electronic Data Deliverable for Data Validation Summary Report: Parcel "C", "D", "F", "G" and "H" Soil Confirmation, Tronox LLC, Henderson, Nevada: NDEP Facility ID # 000539

Dated: July 21, 2010

Dear Mr. Paque,

The NDEP has received and reviewed TRX's above-identified Deliverable and finds that the document is acceptable with the following comments noted for the Administrative Record:

- In correcting data issue b from the original comments (229 results which have a
 final_validation_qualifier but no reason code), it appears that all records where
 final_validation_reason_codes was NULL have now been filled in with the new code "nd"
 (not detected). This means that V2 of the EDD now has 7 results for which
 final_validation_qualifier is NULL and detect_flag_fod = T which have
 final_validation_reason_codes set to "nd", which is clearly incorrect. Neptune has set
 final_validation_reason_codes back to NULL for these records in V3.
- 2. In addressing data issue e (location_id S3-PG-1-1, which is found in the samples table, is missing from the locations table), the location S2-PG-1-1 (which appears in the samples table) appears to have been inadvertently deleted from the locations table. Neptune has copied the location information for this location from the locations table of the previously reviewed version of the database into the location table for the newest version (V3).

The revised version, V3, of the database will be provided electronically to TRX and Northgate Environmental Management, Inc. under separate cover. Please contact the undersigned with any questions at sharbour@ndep.nv.gov or 775-687-9332.





Sincerely.

Shannon Harbour, P.E.

Staff Engineer III

Bureau of Corrective Actions

Special Projects Branch

NDEP-Carson City Office

Fax: 775-687-8335

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

Ranajit 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