



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

Jim Gibbons, Governor  
Allen Biaggi, Director  
Leo M. Drozdoff, P.E., Administrator

August 2, 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, Pre-Confirmation Sampling RZ-B, Tronox LLC,*  
*Henderson, Nevada*  
Dated: July 19, 2010

Dear Mr. Paque,

The NDEP has received and reviewed TRX's above-identified Deliverable and provides comments in Attachment A. TRX should provide an annotated response-to-comments letter by **August 13, 2010** in response to these comments.

Please contact the undersigned with any questions at [sharbour@ndep.nv.gov](mailto: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  
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. Data Issues, NDEP noted 38 records for asbestos where the detect\_flag\_fod = T and result\_reported < SQL. The code final\_validation\_code given is "sp", which was not found in the validation\_reason\_code table. TRX does list "sp#" in the table but it says "detected value reported >SQL <PQL", which is incorrect in this case since the value is < SQL and no PQL is provided. For this issue, please clarify the following:
  - a. The basis for the SQL (i.e. how is this derived since an asbestos\_analytical\_sensitivity value is also provided?).
  - b. Why the asbestos data is qualified with "sp" based on this SQL.
2. Format Issues, please note that the following comments should be corrected for future DVSR submittals. No revision is needed for this Deliverable.
  - a. Field name prep\_date has a space introduced in the name "prep\_date".
  - b. Field name prep\_time has a space introduced in the name "prep\_time".
  - c. The validation code "sp" is found in the results table but not in the validation\_reason table. The validation\_reason table has the # sign after the "sp." Confirm these are equivalent.