



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 11, 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-C, Tronox LLC,*  
*Henderson Nevada*  
Dated: July 28, 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 August 25, 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 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: Susan Crowley, C/O Tronox LLC, PO Box 55, Henderson, NV 89009  
Lee Erickson, Stauffer Management Company

## Attachment A

### **EDD Issues:**

1. Units, unless there is a justifiable reason for reporting the mdl and pql in different units than the result and sql, NDEP's preference is to have these all reported in the same units. Also, TRX should ensure that the units for the sql is identical to the result units since the EDD does not provide explicit units for the sql. TRX should specifically state this in the DVSR.
2. NDEP noted that are 2 identical duplicate records in Samples Table (sample\_id\_field SSAO5-02-1BPC,SA09-5BPC). Please revise this table as necessary.
3. NDEP has noted that there are multiple entries in the Samples Table for samples SSAN6-01-3BPC, SSAN6-02-3BPC, and SSAO5-02-1BPC. These entries differ only in the contents of the percent\_moisture field. If it is the case that there can really be more than 1 percent\_moisture value for a given sample, the percent\_moisture field needs to be moved to the results table. NDEP did not anticipate this scenario in the original EDD guidance; however, if it is a valid scenario, NDEP's EDD guidance will need to be updated. Therefore, please either confirm that the above-described scenario is valid and move percent\_moisture to the Results Table or correct the Samples Table.
4. NDEP has noted that Samples SSA06-02-1BPC\_FD and SSAO6-01-0.33BPC appear in the Results Table but are missing from the Samples Table. Please add these samples to the Samples Table.
5. NDEP has noted that there are 144 results where prep\_time and prep\_date are null (all perchlorates). Please revise the tables as necessary.
6. NDEP has noted that the value "sp", which appears on the final\_validation\_reason\_codes of the results table, appears in validation\_reason table as "sp#." Please revise as necessary.
7. TRX should revise the final\_validation\_reason\_code field in the validation\_reason table as it should be named validation\_reason\_code as per the EDD guidance.