

environmental management, inc.

From: Deni Chambers, C.E.G., C.Hg. Date: April 22, 2010

Josh Otis, P.G.

To: Shannon Harbour, P.E.

Nevada Division of Environmental Protection

RE: Response to NDEP March 29, 2010 Comments on Semi-Annual Remedial

Performance Report for Chromium and Perchlorate, July 2009 – December

2009, Tronox LLC, Henderson, Nevada

RTC on Semi-Annual Remedial Performance Report for Chromium and Perchlorate July 2009 – December 2009

 General comment, please note that NDEP has not included comments that pertain to the effectiveness of capture of the groundwater treatment system (GWTS) as these issues are being addressed by two separate Deliverables which are currently in review by NDEP.

Response: Comment noted.

2. General comment, please note that NDEP's comments should not be considered comprehensive given the limitation noted above.

Response: Comment noted.

- 3. Appendix D, the NDEP provides the following comments:
 - a. The EDD provided with this DVSR does not contain values in the sample_quantitation_limit field. Please clarify if the "method_detection_limit" fields are equal to the NDEP definition of a SQL.

Response: The method_detection_limit field has been updated by the laboratory to reflect their actual MDL. The sample_quantitation_field has been populated to reflect the MDL times the dilution factor for the sample, therefore equivalent to the NDEP SQL.

b. In most instances in the EDD the "practical_quantitation_limit" (PQL) field is equal to the "method_detection_limit" (MDL) field times the "dilution_factor" field. However, there are several instance in the EDD where the PQL value is not equal to the MDL yet the sample was diluted. Please review these data and either correct or clarify in the Deliverable why the same algorithm for deriving the PQL is not applied to these samples.

Response: The PQL field has been updated to reflect the dilution factor in all cases. The laboratory noted a glitch in their reporting system which will be corrected.