



environmental management, inc.

**From:** Derrick Willis  
Cindy Arnold

**Date:** July 21, 2010

**To:** Shannon Harbour, PE  
Nevada Division of Environmental Protection

**RE:** Response to Nevada Division of Environmental Protection's July 6, 2010 Comments on *Data Validation Summary Report, Parcel "C", "D", "F", "G", and "H" Soil Confirmation, Tronox LLC, Henderson, Nevada*, dated June 15, 2010

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### Response to Comments

Northgate Environmental Management, Inc. (Northgate) submits this Response to Comments on the Data Validation Summary Report, Parcel "C", "D", "F", "G", and "H" Soil Confirmation, (DVSR) on behalf of Tronox LLC. Tronox has reviewed the July 6, 2010 Nevada Division of Environmental Protection (NDEP) comments and responds accordingly. It should be noted that all revisions to the document pertain to the Electronic Data Deliverable and that no changes have been made to the original text or tables.

#### Comments

1. *EDD Database, NDEP has the following comments:*
  - a. *General format comments, NDEP has the following comments:*
    - i. *The "result" table should be named "Results".*
    - ii. *validation\_reason\_code field in validation\_reason table should be named final\_validation\_reason\_code.*

**Response:** The Electronic Data Deliverables amendments for the Revised Shallow Supplemental Soil Sampling DVSR were made in accordance with the NDEP-Required EDD format, dated July 7, 2010.

- i. The revised EDD submittal was amended to identify the "Results" table.
      - ii. The revised Validation Reason table was amended to reflect the final\_validation\_reason\_code field as recommended in the NDEP EDD guidance.
2. *Please address the following comments:*
  - iii. *There are 78 non-detect records where result\_reported is null, this field should be populated with the SQL.*
  - iv. *There are 229 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. Please add a new reason code that will apply to these true non-*

*detects.*

- v. There are 20 non-rad, non surrogate, non TEQ results where pql is null.*
- vi. sample\_id\_field P2-PF-1-1-0.0, which is found in the results table, is missing from the samples table.*
- vii. location\_id S3-PG-1-1, which is found in the samples table, is missing from the locations table.*

**Response:** The items listed were addressed in the revised EDD submittal for the Revised Shallow Supplemental Soil Sampling DVSR in accordance with the NDEP-Required Electronic Data Deliverables (EDD) format, dated July 7, 2010.

- i. The revised EDD submittal was amended by populating all non-detected nulls with the sample specific SQL.
- ii. The revised result table was amended to include the new reason code “nd” for all qualified non-detected values previously null. The new validation reason code “nd” was also added to the validation reason code table.
- iii. The revised results table was amended by removing all internal standards and Aroclor 1262 and 1268 that were included in error. The remaining practical quantitation limits (PQL) left null are limited to total toxicity equivalency and percent moisture, which do not require specific a PQL.
- iv. The samples table was amended to include the missing sample ID (P2-PF-1-1-0.0).
- v. The locations table was amended to include the missing sample ID (S3-PG-1-1).

