



**LETTER OF TRANSMITTAL**  
1232.01.32

April 16, 2013

Weiquan Dong  
Nevada Division of Environmental Protection  
2030 East Flamingo Road, Suite 230  
Las Vegas, NV 89119

**Via: Electronic Mail**

Description	Date	No. of Copies
<p>The following is enclosed per the latest requirements for submittal of deliverables to NDEP and distribution to other companies, dated April 8, 2013.</p> <ul style="list-style-type: none"> <li>• Response to NDEP's February 21, 2013 Comments to the <i>Data Validation Summary Report, Additional Pre-Confirmation Sampling, Nevada Environmental Response Trust Site, Henderson, Nevada</i>, dated April 11, 2011</li> <li>• Revised EDD per above comments to the <i>Data Validation Summary Report, Additional Pre-Confirmation Sampling, Nevada Environmental Response Trust Site, Henderson, Nevada</i>, dated April 11, 2011 (Submitting as Separate Electronic File)</li> </ul>	4/16/13	1

The item(s) are transmitted:

<input checked="" type="checkbox"/>	At your request	<input checked="" type="checkbox"/>	For your action
<input type="checkbox"/>	For your review/comment	<input type="checkbox"/>	For your files
<input type="checkbox"/>	For approval	<input type="checkbox"/>	For your information

**Comments:**

If you should have any questions, please contact me at (949) 716-0050 extension 101.

Sincerely,

Derrick Willis  
Principal

cc: Deni Chambers, Northgate  
Christa Smaling, BMI Compliance Coordinator, NDEP LV  
Kelly Schilling, Neptune, Inc.  
Brian Rakvica, McGinley & Associates, Las Vegas NV  
Jeff Gibson, AMPAC  
Mark Paris, BRC  
Lee Farris, BRC  
Ranajit Sahu, BRC  
Joe Kelly, Montrose Chemical  
Paul Sundberg, Montrose Chemical  
Jay Steinberg, ENVIRON  
Allan DeLorme, ENVIRON  
John Pekala, ENVIRON  
Curt Richards, Olin  
Jay Gear, Olin  
Ed Modiano, *de maximis inc.*  
Chuck Elmendorf, Stauffer Management Company, LLC  
Nicholas Pogoncheff, PES Environmental, Inc.  
George Crouse, Syngenta Crop Protection, Inc.  
David Hadzinski, c/o TIMET-HSEA Dept.  
Kirk Stowers, Broadbent & Associates  
Victoria Tyson, Tyson Contracting  
Enoe Marcum, WAPA





**From:** Deni Chambers, C.E.G, C.Hg  
Derrick Willis, Principal  
Cindy Arnold, Quality Assurance Officer

**Date:** April 16, 2013

**To:** Weiquan Dong, P.E.  
Bureau of Corrective Actions  
Nevada Division of Environmental Protection

**RE: Tronox LLC (TRX) Facility, Nevada Environmental Response Trust (Trust) Property, NDEP Facility ID #H-00539** - Nevada Division of Environmental Protection (NDEP) Response to *Data Validation Summary Report Additional Pre-Confirmation Sampling Nevada Environmental Response Trust Site, Henderson, Nevada*, Dated April 11, 2011

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**Response to NDEP's February 21, 2013 Comments on  
Data Validation Summary Report, Additional Pre-Confirmation Sampling**

1. *Comment: The 'Results' Table should be named Results Table (extra 'l').*

**Response:** The "Results" Table tab was amended by removal of the additional "l". This revision and all subsequent revisions in this response are presented in the revised EDD file NDEP\_EDD\_TRONO-2711-2011\_V2.

2. *Comment: There are duplicate Sample ID values in the "sample\_id\_field" in the Samples Table. This field value must be unique.*

**Response:** The "Samples" Table was reviewed and duplicate "sample\_id\_field" entries for SA72-1\_01\_BPC and SSA07-02-0.00BPC were removed.

3. *Comment: There are duplicate Location ID values in the Locations. This field value must be unique.*

**Response:** The "Locations" Table was reviewed and duplicate "location\_id" entries for SSAP7-02 and SSAQ4-03 were removed.

4. *Comment: The currently named "preparation\_date" and "preparation\_time" fields should be named Prep\_date and Prep\_time in the Results Table. (Note the fields currently provided have a space before the underscore.)*

**Response:** The "Results" Table was amended to present the "Field Names" as "prep\_date" and "prep\_time."

5. *Comment: There are 101 records in Results Table where detect\_flag\_fod='T' but all have the UJ qualifier. If the records are qualified with a U, UJ, or R, then the detect\_flag\_fod should not be equal to "T".*

**Response:** The 101 records in the "Results" Table where both the "detect\_flag\_fod" and "detect\_flag\_ra" were "T" and the "validation\_qualifier" was "UJ" were amended to reflect both the "detect\_flag\_fod" and "detect\_flag\_ra" equal to "F," indicating non-detected values, in accordance with the NDEP-Required Electronic Data Deliverables (EDD) Format, July 7, 2010.

6. *Comment: There are 2870 records in Results Table where PQL=NULL and the analytical\_suite field is equal to SVOCs, VOCs, and OCPESTs. A PQL should be provided for these analyses.*

**Response:** The "Results" Table was reviewed and showed the 2870 records where the PQL=NULL and "analytical\_suite" equals: SVOC, VOCs and OCPEST are identified as "result\_type" SURR (indicating these records are for surrogates), therefore a PQL is not required for these records.

7. *Comment: The Validated\_flag in Results Table should be named validation\_flag.*

**Response:** The "Results" Table was amended to reflect the "Field Name," "validation\_flag."

