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DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION

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October 22, 2005

Ms. Susan Crowley
Kerr-McGee Chemical LLC
PO Box 55
Henderson, Nevada 89009

Re: **Tronox LLC (Tronox)**
NDEP Facility ID #H-000539
Nevada Division of Environmental Protection Response to:
*Tronox Response to NDEP Comments of September 6, 2005 Regarding the
Conceptual Site Model*
dated October 14, 2005

Dear Ms. Crowley,

The NDEP has received and reviewed Tronox's letter identified above and provides two comments below.

1. Tronox Response 1, it is not clear why the unapproved data usability report is proposed to be included in the CSM. Please do not include this document in the CSM. Tronox should consider initiation of data validation of all data sets that are proposed to be used in this project. If Tronox needs additional clarification on what is expected in the data validation reports a meeting can be scheduled between the NDEP's chemist and Tronox's chemists.
2. Tronox Response 13, please list the identification of the composition of site-related wastes as a data gap.

Please provide a response to these comments in our next monthly meeting. If there is anything further or if there are any questions please do not hesitate to contact me.

Ms. Susan Crowley

10/22/2005

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Sincerely,



Brian A. Rakvica, P.E.
Supervisor
Bureau of Corrective Actions
Special Projects Branch
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CC: Jim Najima, NDEP, BCA, Carson City
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