

March 27, 2008

Ms. Shannon Harbour, P.E.
Nevada Division of Environmental Protection
Bureau of Corrective Actions
2030 E. Flamingo Road, Suite 230
Las Vegas, Nevada 89119-0818



Subject: Data Validation Summary Report for the Tronox Parcels C, D, F, and G Investigation – November 2007, BMI Industrial Complex, Clark County, Nevada

Dear Shannon:

On behalf of Ranajit Sahu please find enclosed replacement pages (Tables 2-7 and 2-9) and DVD for the *Data Validation Summary Report* for the Tronox Parcels C, D, F, and G Investigation – November 2007, BMI Industrial Complex, Clark County, Nevada. The following are our response to your comments dated March 24, 2008.

1. Table 2-1, three Analysis Dates for laboratory sample F7K150237005, in Table 2-7, page 17 of 31 appears incorrect.

Response: This is an Excel format error. The dates are correct and the formatting has been changed to MM/DD/YYYY consistent with the other records in this table.

2. Database, the Analytical Method name “KWSR” is included in the database. This method is not included in Table 1-2. The report should clarify the name KWSR or correct the database.

Response: This is an internal TestAmerica Richland code, not the method name. TestAmerica has many combinations of the sequence that they run preparation and separation methods so they use codes that establish the different sequences and other parameters involved. This is the total dissolution method. The correct method for the uranium isotopes is RC-5067 or HASL-300. This method has been changed in the database.



3. Tables 2-9 and 2-10, a number of the values in the Limit column are incorrect. In some cases they appear to match the QL value, in other instances their origin is unclear. The values in the Limit column should show the maximum RPD, difference, or RER value that is acceptable.

Response: Table 2-9 has been resorted in order to view the primary and duplicate pair for each result together. The limits were reviewed on both tables and only two errors in the limit were found on Table 2-9. The control limits of acetone for sample TSB-FJ-6-0 was revised from 5.1 to 21 ug/kg and of nitrate for sample TSB-GJ-02-0 the limit was revised from 0.25 to 0.21 mg/kg. Neither change resulted in qualifier changes. Amended data validation reports have been provided. No errors were found on Table 2-10.

To reiterate what is presented in SOP 40, duplicates are evaluated using a RPD limit of 50% for field duplicates or 20% for laboratory duplicates (inorganics only) unless the result is less than five times the reporting limit. In that case the absolute value of the reporting limit is used as a control limit. For laboratory duplicates the qualifier is applied to all samples in the analytical batch while for field duplicates the qualifier is applied to the primary and duplicate sample only.

If you have any questions or comments, please contact me at 916-924-9378 or Ranajit Sahu at 626-382-0001.

Sincerely,



Mark K. Jones
Project Manager

Enclosures: Data Validation Summary Report for the Tronox Parcels C, D, F, and G Investigation - November 2007, BMI Industrial Complex, Clark County, Nevada

cc: Ranajit Sahu, BEC, 875 West Warm Springs Road, Henderson, NV 89011
Brian Rakvica, NDEP, BCA, Las Vegas, NV 89119
Jim Najima, NDEP, BCA, Carson City, NV 89701
David Gratson, Neptune and Company, Inc., 3128 Pueblo Hawikuh, Santa Fe, NM 87507