



Susan Crowley
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March 10, 2010

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

Re: **Tronox LLC (TRX)**
NDEP Facility ID #H-000539
Tronox Response to Nevada Division of Environmental Protection (NDEP) 2-26-10 Comments
Regarding: Tronox's *Data Validation Summary Report, Phase B Investigation Area III Soil, Tronox
LLC, Henderson, Nevada*
Dated February 18, 2010

Dear Ms. Harbour,

Please find attached TRX's response to NDEP comments regarding the subject document. Included is an annotated RTC (in Attachment A). Tronox believes that the text is clear, and that no amendment to the DVSR is necessary.

I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and, to the best of my knowledge, comply with all applicable federal, state and local statutes, regulations and ordinances.

Please contact me with any questions at susan.crowley@tronox.com or at (702) 592-7727. Thank you.

Sincerely,

Susan Crowley
CEM 1428, exp 3-8-11

Tronox. Adding value beyond the product.

Shannon Harbour

March 10, 2010

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CC: Jim Najima, NDEP, BCA, Carson City
Keith Bailey, Environmental Answers LLC, 3229 Persimmon Creek Drive, Edmond, OK 73013
Susan Crowley, Crowley Environmental LLC, 366 Esquina Dr, Henderson NV 89014
Mike Skromyda, Tronox LLC, PO Box 55, Henderson, NV 89009
Deni Chambers, Northgate Environmental, 300 Frank H. Ogawa Plaza, Suite 510, Oakland, CA 94612
Barry Conaty, Holland & Hart LLP, 975 F Street, N.W. Suite 900, Washington, D.C. 20004
Brenda Pohlmann, City of Henderson, PO Box 95050, Henderson, NV 89009
Mitch Kaplan, U.S. Environmental Protection Agency, Region 9, mail code: WST-5, 75 Hawthorne Street, San Francisco, CA 94105-3901
Ebrahim Juma, Planning Manager, Air Quality and Environmental Management, 500 S. Grand Central Pkwy, 1st floor, P.O. Box 555210, Las Vegas, NV 89155-5210
Ranajit Sahu, BRC, 311 North Story Place, Alhambra, CA 91801
Rick Kellogg, BRC, 875 West Warm Springs, Henderson, NV 89011
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Craig Wilkinson, TIMET, PO Box 2128, Henderson, Nevada, 89009-7003
Kirk Stowers, Broadbent & Associates, 8 West Pacific Avenue, Henderson, Nevada 89015
George Crouse, Syngenta Crop Protection, Inc., 410 Swing Road, Greensboro, NC 27409
Nick Pogoncheff, PES Environmental, 1682 Novato Blvd., Suite100, Novato, CA 94947
Lee Erickson, Stauffer Management Company, P.O. Box 18890, Golden, CO 80402
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Larry Cummings, AMPAC, 3883 Howard Hughes Pkwy, Ste 700, Henderson, NV 89169

Attachment A

1. Introduction, 2nd paragraph, the DVSR states there are "676 field quality control (QC) samples." This number does not agree with the data presented in Table 1-1. Please clarify or correct this difference as necessary.

Response:

The Introduction text was confirmed to agree with the values presented in Table 1-1. The field quality control samples used to calculate the total 676 field QC value are defined in the text. 676 field QC samples = 30 Field Blanks + 149 Equipment Blanks + 304 Field Duplicates + 193 MS/MSDs. Tronox believes that the text is clear, and that no amendment to the DVSR is necessary.

DVSR Introduction text

Area III soils were collected from 33 borings resulting in the analyses of 2,990 environmental and 676 field quality control (QC) samples (field blank, equipment blank, field duplicate, and matrix spike [MS]/MS duplicate [MSD] analysis).

2. Sample Conditions. Section 3.0, the DVSR does not describe whether any sample receipt conditions that do not meet method/SOP requirements were identified or encountered for this sampling and analysis effort. These would include cooler temperatures and preservative. Sample preservation is mentioned in Section 3.1 but no details are provided with respect to these samples. Please revise the DVSR to include discussion on whether any issues were identified and how they impacted the data quality

Response:

The text in Section 3.1 clarifies that no hold time or preservation deficiencies were found in association with this DVSR data submittal. Sample preservation and temperature were documented on the laboratory sample custody records. Sample preparation and analytical hold times are also reviewed by the analyzing laboratory and deficiencies are listed in laboratory reports as presented in Appendix A of this DVSR. Sample temperature, preservation and hold time are reviewed during the validation process and qualified per the BMI Common Areas, Clark County, Nevada SOP-40 Data Review/Validation, May 2009. The Area III Soil validation reports are presented as Appendix B, with no hold time or preservation deficiencies listed. Tronox believes that the text is clear, and that no amendment to the DVSR is necessary.

DVSR text from Section 3.1

None of the Area III soil and SPLP sample data were qualified due to hold time and preservation exceedances.