



environmental management, inc.

From: Deni Chambers
Derrick Willis

Date: August 25, 2010

To: Shannon Harbour, P.E.
Nevada Division of Environmental Protection

RE: Response to August 11, 2010 Nevada Division of Environmental Protection (NDEP) Comments on *Data Validation Summary Report, Pre-Confirmation Sampling RZ-C*, Dated July 28, 2010.

1. *Comment:* Units, unless there is a justifiable reason for reporting the mdl and pql in different units than the result and sql, NDEP's preference is to have these all reported in the same units. Also, TRX should ensure that the units for the sql is identical to the result units since the EDD does not provide explicit units for the sql. TRX should specifically state this in the DVSR.

Response: The EDD was reviewed and amended to reflect the same units for: mdl, pql, sql and the analytical result.

2. *Comment:* NDEP noted that there are 2 identical duplicate records in Samples Table (sample_id_field SSAO5-02-1BPC,SA09-5BPC). Please revise this table as necessary.

Response: The samples table was amended by removing the duplicate records.

3. *Comment:* NDEP has noted that there are multiple entries in the Samples Table for samples SSAN6-01-3BPC, SSAN6-02-3BPC, and SSAO5-02-1BPC. These entries differ only in the contents of the percent_moisture field. If it is the case that there can really be more than 1 percent_moisture value for a given sample, the percent_moisture field needs to be moved to the results table. NDEP did not anticipate this scenario in the original EDD guidance; however, if it is a valid scenario, NDEP's EDD guidance will need to be updated. Therefore, please either confirm that the above-described scenario is valid and move percent_moisture to the Results Table or correct the Samples Table.

Response: The multiple percent moisture entries for samples SSAN6-01-3BPC, SSAN6-02-3BPC and SSAO5-02-1BPC are due to multiple laboratories performing sample analysis. The samples table was amended to reflect a single percent moisture for samples SSAN6-01-3BPC, SSAN6-02-3BPC and SSAO5-01-1BPC, where the percent moisture represents the maximum percent moisture obtained. This scenario was discussed with NDEP and Tronox will implement the revised NDEP EDD percent moisture guidance with the next EDD submittal.

4. *Comment:* NDEP has noted that Samples SSA06-02-1BPC_FD and SSAO6-01-0.33BPC appear in the Results Table but are missing from the Samples Table. Please add these samples to the Samples Table.

Response: The samples table was amended to include data for field samples: SSA06-02-1BPC_FD and SSAO6-01-0.33BPC.

5. *Comment:* NDEP has noted that there are 144 results where prep_time and prep_date are null (all perchlorates). Please revise the tables as necessary.

Response: The results table was amended by populating the prep_time and prep_date for all perchlorate analysis.

6. *Comment:* NDEP has noted that the value “sp”, which appears on the final_validation_reason_codes of the results table, appears in validation_reason table as “sp#.” Please revise as necessary.

Response: The final_validation_reason_codes “sp” presented on the results table is correct. The “sp#” value found in the validation_reason table was amended to “sp.”

7. *Comment:* TRX should revise the final_validation_reason_code field in the validation_reason table as it should be named validation_reason_code as per the EDD guidance.

Response: The validation_reason table was amended to reflect the prescribed field final_validation_reason_code.

