



environmental management, inc.

From: Deni Chambers
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Date: September 8, 2010

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

RE: Response to September 1, 2010 Nevada Division of Environmental Protection (NDEP) Comments on *Revised Data Validation Summary Report, Pre-Confirmation Sampling RZ-D, EDD Only*, Dated August 26, 2010.

1. *Comment:* Response to comments (RTC) 1, NDEP observed that there are still 48 records in which the results reported and sql units differ (uk/kg versus pg/g). All of these are associated with surrogate in the organochlorine pesticide analysis. Since the surrogate sql is not used, these fields do not need to be revised.

Response: Tronox has made the necessary changes to the EDD writer so that these discrepancies and surrogate results are eliminated in future EDDs.

2. *Comment:* There are 172 records (all for asbestos) where the validation_reason_code (i.e. final_validation_reason_codes) is NULL and the final_validation_qualifier is NOT NULL. In many cases the final_validation_qualifier is U, indicating the result is a non-detect, and this is consistent with the reported value. This is acceptable as long as the detect flat = F, as is true in this case. However, there are 40 of the 172 records where the final_validation_qualifier is J. The prior EDD did not have a final_validation_qualifier for these same results. For records that are detects, and also have a final validation qualifier, a final validation reason codes field should be populated. Please provide a reason code or explanation for the J qualified asbestos result.

Response: The asbestos samples were J qualified because the resulting value was between the MDL and the PQL. Since the SQL reporting has been eliminated from the asbestos sample reporting, we eliminated the "sp" final validation reason code as it had no meaning in fact. The "sp" has been replaced for the 40 records in question.