February 23, 2006

Ms. Susan Crowley Tronox LLC PO Box 55 Henderson, Nevada 89009

Re: Tronox LLC (Trx) NDEP Facility ID #H-000539

> Nevada Division of Environmental Protection Response to: *Upgradient Investigation Work Plan* dated February 2006

Dear Ms. Crowley,

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

- 1. Table 2, it is suggested that hexavalent chromium be analyzed from the same depth increments as the remaining metals.
- 2. Table 8, please include xylenes in the VOC analysis.

These comments should be addressed as part of the work plan implementation. If there is anything further or if there are any questions please do not he sitate to contact me.

Sincerely,

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

Jeff Johnson, NDEP, BCA, Carson City

Shannon Harbour, NDEP, Las Vegas

Todd Croft, NDEP, Las Vegas

Barry Conaty, Akin, Gump, Strauss, Hauer & Feld, L.L.P., 1333 New Hampshire Avenue, N.W., Washington, D.C. 20036

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

Rob Mrowka, Clark County Comprehensive Planning, PO Box 551741, Las Vegas, NV, 89155-1741

Ranajit Sahu, BEC, 311 North Story Place, Alhambra, CA 91801

Keith Bailey, Tronox, PO Box 268859, Oklahoma City, Oklahoma 73126-8859

Craig Wilkinson, TIMET, PO Box 2128, Henderson, Nevada, 89009-7003

Kirk Stowers, Broadbent & Associates, 8 West Pacific Avenue, Henderson, Nevada 89015

Mr. George Crouse, Syngenta Crop Protection, Inc., 410 Swing Road, Greensboro, NC 27409

Mr. Lee Erickson, Stauffer Management Company, 1800 Concord Pike, Hanby 1, Wilmington, DE 19850-5437

Mr. Chris Sylvia, Pioneer Americas LLC, PO Box 86, Henderson, Nevada 89009

Mr. Paul Sundberg, Montrose Chemical Corporation, 3846 Estate Drive, Stockton, California 95209

Joe Kelly, Montrose Chemical Corporation of CA, 600 Ericksen Avenue NE, Suite 380, Bainbridge Island, WA 98110