

August 6, 2007

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: *Phase 2 Sampling and Analysis Plan to Conduct Soil Characterization, Tronox Parcels "A" and "B" Site, Henderson, Nevada* dated July 24, 2007

Dear Ms. Crowley,

The NDEP has received and reviewed TRX's Phase 2 report identified above and provides comments in Attachment A. A revised Phase 2 report should be submitted based on the comments found in Appendix A. Please advise the NDEP regarding the schedule for this resubmittal. TRX should additionally provide an annotated response-to-comments letter as part of the Revised Phase 2 submittal.

Please contact the undersigned with any questions at (702) 486-2850 x 240 or sharbour@ndep.nv.gov.

Sincerely,

Shannon Harbour, P.E.
Staff Engineer III
Bureau of Corrective Actions
Special Projects Branch
NDEP-Las Vegas Office

CC: Jim Najima, NDEP, BCA, Carson City
Brian Rakvica, NDEP, BCA, Las Vegas
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Chris Sylvia, Pioneer Americas LLC, PO Box 86, Henderson, Nevada 89009
Paul Sundberg, Montrose Chemical Corporation, 3846 Estate Drive, Stockton, California
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Joe Kelly, Montrose Chemical Corporation of CA, 600 Ericksen Avenue NE, Suite 380,
Bainbridge Island, WA 98110

Attachment A

1. General comment, TRX should include a discussion on where the judgmental samples were chosen and/or why they were chosen.
2. Scope of Work, Task 1: Field Implementation, the basis for the reduced list of analytes is not defensible.
 - a. NDEP has not received TRX's Phase A data; therefore, any eliminations of any site-related chemicals (SRCs) based on the Phase A results or background comparisons to the Phase A results cannot be evaluated at this time. NDEP cannot review statements by TRX that are based upon data that has not been submitted. The discussion that TRX is presenting must be supported by data.
 - b. Statements such as "the only detection in that analytical suite...was very low" have no meaning. It would be more appropriate to compare an actual data point to a meaningful metric.
 - c. Please note and revise text accordingly that dioxins/furans are listed on the TRX SRC list dated March 2006.
 - d. If TRX wants to move forward with the Phase 2 Sampling, then TRX should supply different rationale/evidence for the exclusion of a SRC or include the SRC in the analytical list in Table 1.
3. Scope of Work, Task 1: Field Implementation, 3rd paragraph, page 3, a proposed schedule for additional deeper (greater than 10' below ground surface [fbgs]) should be submitted by TRX for these parcels and BEC should provide a proposed schedule for construction of potential surface improvements. These schedules will help the NDEP determine if the construction schedule will interfere with the characterization schedule by buildings, etc. being constructed and occupied prior to the potential for the characterization data to illustrate unacceptable risk to on site workers and customers.
4. Schedule, 1st paragraph, please verify that the 28 day turn around time is applicable to all analytes (i.e.: asbestos).
5. Table 1, soil samples collected at 5 fbgs are not listed on this table; however, the last paragraph on page 3 states that samples will be collected at 0, 5, and 10 fbgs. This table needs to be modified to match the text.
6. Figures 2 and 3, the NDEP has the following comments:
 - a. As noted above, please provide discussion on how each of the judgmental samples was selected.
 - b. Grids should be labeled for ease of discussion.
7. Figure 2, the NDEP requests that the 5 partial grids adjacent to the eastern property boundary of the site be sampled.
8. Figure 3, the NDEP requests that the following grids be sampled:
 - a. grid adjacent to the east of the grid containing TSB-BR-05
 - b. grid adjacent to the east of the grid containing TSB-BR-04
 - c. grid adjacent to the south of the grid containing TSB-BJ-04
 - d. grid adjacent to the east of the grid containing TSB-BR-01
 - e. grid adjacent to the south of the grid described in comment 8.d
 - f. grid adjacent to the east of the grid described in comment 8.d
 - g. grid adjacent to the east of the grid described in comment 8.e