

September 19, 2007

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 "G" Site, Henderson, Nevada*
Dated August 28, 2007

Dear Ms. Crowley,

The NDEP has received and reviewed TRX's Phase 2 Sampling and Analysis Plan (SAP) 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

SH:sh

CC: Jim Najima, NDEP, BCA, Carson City
Brian Rakvica, NDEP, BCA, Las Vegas
Keith Bailey, Tronox, Inc, 3229 Persimmon Creek Drive, Edmond, OK 73013
Sally Bilodeau, ENSR, 1220 Avenida Acaso, Camarillo, CA 93012-8727
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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
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Ranajit Sahu, BRC, 311 North Story Place, Alhambra, CA 91801
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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
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Lee Erickson, Stauffer Management Company, P.O. Box 18890, Golden, CO 80402
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, the Figures do not show the relationship of Parcel “G” (Site) to surrounding source areas. TRX has identified most of these source areas in their CSM; however, transparency is lacking in this document. Please provide a map showing the Site in comparison to these source areas.
2. Background, the NDEP provides the following comments:
 - a. TRX states that this Site is in “the vicinity of BMI Industrial Companies”. The Site is located on TRX property and in the vicinity of other BMI Industrial Companies. Please revise the text accordingly.
 - b. TRX states that two monitoring wells (TR-7 and TR-8) are located within the Site. TRX additionally states that monitoring well data from TR-8 indicated that concentrations of monitored chemicals are “generally low to non-detect”. Please provide a table listing the concentration data available from all of the monitoring wells located on and in the immediate vicinity of the Site.
 - c. TRX states that the concentration of chloroform in TR-8 was 2,500 ppb. Please provide a discussion on the vapor intrusion pathway in relation to future land use including development and construction activities.
 - d. TRX proposes to focus sampling on the upper five feet of soil since five feet of fill will be imported to bring the Site to grade for construction. Please note that deed restrictions may need to be placed on the Site to facilitate a No Further Action Determination (NFAD).
3. Scope of Work, Task 1: Field Implementation, see the following comments:
 - a. The reference for the BRC Field Sampling and Standard Operating Procedures (FSSOP) should be updated.
 - b. TRX states that dioxins and furans are not proposed for to be analyzed because of no indication of any surface impacts. The NDEP believes that dioxin/furan impacts are expected throughout the BMI Complex and it is necessary to include their analysis for surface soils.
 - c. The reference for the quality assurance project procedure (QAPP) should be updated.
4. Scope of Work, Task 2: Data Evaluation, please add SOP 40 to the QAPP reference.
5. Schedule, 1st paragraph, please verify that the 28-day turn around time is applicable to all analytes (i.e.: asbestos, radionuclides).
6. The following comments are based on a May 11, 2007 letter from the NDEP, Re: Nevada Division of Environmental Protection Response to: *Phase I Environmental Site Assessment – Approximately 182 Acres of land* (Phase I), dated March 5, 2007. These comments were generated for the “four acre parcel” (currently labeled as Parcel “G” in the Phase 2 SAP).
 - a. TRX’s contractor Basic Remediation Company (BRC) stated during a site visit with the NDEP that there is an earthen stormwater basin of unknown origin/use located on this parcel (predominately located in grid G-A2). Please discuss any information found regarding this basin. Also, please add a judgmental sample in this area.
 - b. BRC identified the electrical vault on this parcel as unknown ownership and use during a site visit with the NDEP. NDEP noted that it appears to be in line with the WAPA cable tunnel. Please discuss the ownership and use of this vault.
7. Table 1, the NDEP has noted numerous errors on this table in respect to TRX’s site related chemical (SRC) list. For example, (please note that this is not a complete list):

- a. 1,2 Dichlorobenzene; 1,3 Dichlorobenzene; and 1,4 Dichlorobenzene are not listed on Table 1.
- b. 2-Methylnaphthalene, bis(2-Ethylhexyl) phthalate, and Dimethyl phthalate are not indicated as being on the TRX SRC list even though they are listed on the March 2006 SRC list for TRX.