

October 9, 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 Parcel "F"
Site, Henderson, Nevada, Revision 1 (dated September 19, 2007)

Dear Ms. Crowley,

The NDEP has received and reviewed TRX's above-referenced Phase 2 Sampling and Analysis Plan (Phase 2 SAP) and finds that the document is acceptable with the following exceptions to be addressed in the resulting investigation report:

1. Table 1, the NDEP noted that data for TR-5 was not listed on this table as requested. Please provide this data in the investigation report. In addition, please provide discussion on included data that includes comments on comparability and applicability of the data.
2. Response to comments (RTC) 2.d, TRX states that no further evaluation of the vapor intrusion pathway is recommended for this part of the Phase 2 SAP because the depth to groundwater and that soil vapor sampling will be conducted under another work plan. The NDEP acknowledges that the soil vapor will be addressed in another work plan but cautions that this data may be needed to facilitate a No Further Action Determination (NFAD).
3. RTC 7.e, TRX states that the mobile aboveground storage tank (AST) was on the adjacent TIMET property and appears to be empty with "some solid residue in the bottom". Please discuss what materials were in this tank. The NDEP has observed this tank on the northeast corner of grid F-B2. Please add a judgmental sample in this location. In addition, please state what actions TRX proposes for use or disposal of this AST. Please submit errata pages for the above-referenced report prior to the commencement of field work that addresses the addition of this sample (e.g. page 4, Figure 2, etc.).

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

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
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