

December 11, 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:  
*Response to Nevada Division of Environmental Protection (NDEP) Comments to the  
Revised Work Plan to Evaluate Effective Groundwater Capture at Tronox LLC,  
Henderson, Nevada*  
Dated November 28, 2007

Dear Ms. Crowley,

The NDEP has received and reviewed TRX's response to comments identified above and finds that the document is acceptable with the following exceptions noted for the administrative record: (Please note that nothing further is required by the NDEP for this Deliverable.)

- General comment, the NDEP recognizes that the new wells PC-134 and PC-135 are located within the highest concentration area. The NDEP believes that providing monitor wells at this one location on the western lobe of the paleochannel will provide the minimum amount of data to demonstrate inward flow. Please note that after collecting and analyzing the data from this location, TRX may find it necessary to install an alluvial well to the west of PC-134 to provide more data for gradient mapping and groundwater elevation contouring for the western lobe of the paleochannel and/or to the east of PC-136 for the eastern lobe of the paleochannel.
- TRX Response to NDEP comment #3, please note that the NDEP's comment requested information on the type of hydraulic testing that TRX was proposing and was not specific to vertical hydraulic conductivity.
- TRX response to NDEP comment #8.c, the NDEP does acknowledge their June 26, 2007 comment that "overlapping cones of depression can be a line of evidence" for demonstrating groundwater capture. However, the June 26, 2007 comment also stated that "The capture zone and cone of depression will only be the same if background hydraulic gradient is zero." Also, the NDEP did not state that overlapping cones equate to capture in the June 26, 2007 comments. Given the current data set at Athens Rd Well Field; the drawdown data indicate capture while more importantly the groundwater elevation maps do not have closed contours indicating inward flow from down gradient. Please note that TRX has drawn the contour map

for the eastern lobe of the channel to show a closed contour but the elevation data on the map do not support that interpretation.

Please contact the undersigned with any questions at [sharbour@ndep.nv.gov](mailto: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:bar:sh

CC: Jim Najima, NDEP, BCA, Carson City  
Brian Rakvica, NDEP, BCA, Las Vegas  
Keith Bailey, Environmental Answers LLC, 3229 Persimmon Creek Drive, Edmond, OK 73013  
Sally Bilodeau, ENSR, 1220 Avenida Acaso, Camarillo, CA 93012-8727  
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, BRC, 311 North Story Place, Alhambra, CA 91801  
Rick Kellogg, BRC, 875 West Warm Springs, Henderson, NV 89011  
Mark Paris, Landwell, 875 West Warm Springs, Henderson, NV 89011  
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  
Nick Pogoncheff, PES Environmental, 1682 Novato Blvd., Suite100, Novato, CA 94947  
Lee Erickson, Stauffer Management Company, P.O. Box 18890, Golden, CO 80402  
Stan Smith, Olin Chlor Alkali, PO Box 86, Henderson, Nevada 89009  
Michael Bellotti, Olin Corporation, PO Box 248 1186 Lower River Road, Charleston TN 37310-0248  
Curt Richards, Olin Corporation, PO Box 248 1186 Lower River Road, Charleston TN 37310-0248  
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  
Paul Hackenberry, Hackenberry Associates, LLC, 550 W. Plumb Lane B425, Reno, Nevada  
89509  
Brian Giroux, McGinley and Associates, 425 Maestro Drive, Suite 202, Reno, NV 89511