March 26, 2008

Susan Crowley Tronox LLC PO Box 55 Henderson, Nevada 89009

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

Nevada Division of Environmental Protection (NDEP) Response to: Phase B Source Area Investigation – Soil Gas Survey Work Plan, Tronox LLC, Henderson, Nevada Dated March 20, 2008

Dear Ms. Crowley,

The NDEP has received and reviewed TRX's above-identified Work Plan and finds that the document is acceptable with the following conditions:

- 1. Based on the referenced BRC Standard Operating Procedure (SOP) 37 Active Soil Gas Investigation, the soil gas samples are to be collected at five feet below ground surface (fbgs) not ten fbgs as proposed in the Work Plan. TRX should collect soil gas samples at five fbgs except for those samples located in the vicinity of Unit 3. These samples should be collected at five feet below the depth of the Unit 3 basement.
- 2. NDEP expects that the issue of data adequacy for soil gas will be addressed once data is received. The form and timing of this evaluation can be discussed with the NDEP at a later date.

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

Ebrahim Juma, Clark County Comprehensive Planning, PO Box 551741, Las Vegas, NV, 89155-1741

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

Nick Pogoncheff, PES Environmental, 1682 Novato Blvd., Suite100, Novato, CA 94947

Lee Erickson, Stauffer Management Company, P.O. Box 18890, Golden, CO 80402

Michael Bellotti, Olin Corporation, 3855 North Ocoee Street, Suite 200, Cleveland, TN 37312

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