April 3, 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: Quarterly Performance Report for Remediation Systems, Tronox LLC, Henderson, Nevada, Appendix C – Data Validation Summary Report (DVSR) Dated February 27, 2008

Dear Ms. Crowley,

The NDEP has received and reviewed TRX's DVSR identified above and provides comments in Attachment A. TRX should note that this DVSR was reviewed for completeness, rationality, accuracy of the text with the tables and a random crosscheck with laboratory reports. This review did not encompass 100% of the report but was a sampling of the laboratory reports and database against the tables provided in the report. Errata pages should be submitted based on the comments found in Appendix A. Please advise the NDEP regarding the schedule for this submittal. TRX should additionally provide an annotated response-to-comments letter as part of the submittal.

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: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

Curt Richards, Olin Corporation, 3855 North Ocoee Street, Suite 200, Cleveland, TN 37312

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

Dave Gratson, Neptune and Company, 1505 15th Street, Suite B, Los Alamos, NM 87544

Attachment A

- 1. Hexavalent Chromium, Sample M-11, Report number 221809, the laboratory report for Sample M-11 in SDG 221809 indicates this sample was analyzed past the holding time; however, this sample is not included in Table D-3 nor is the result under that SDG qualified. These results should be reviewed and this potential discrepancy clarified
- 2. DVSR, Memorandum dated January 29, 2008, the Memorandum refers to Report number 22057R; the correct report name is 220257R.
- 3. Sample M-10_11/07/07, this sample was analyzed under two different SDGs, 221802 and 221809, with the analysis for TDS under both. The DVSR should clarify that these analyses were split between two SDGs and discuss how the TDS results were used since they were reported in both SDGs.