

# STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

July 2, 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:  
*Removal Action Workplan for Soil, Tronox Parcels "C", "D", "F", "G", and "H" Stes,*  
*Henderson, Nevada*  
Dated July 1, 2008

Dear Ms. Crowley,

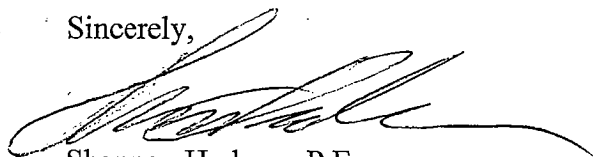
The NDEP has received and reviewed TRX's above-identified Removal Action Workplan (Work Plan) and finds that the document is acceptable with the following exceptions noted for the administrative record:

- TRX states that a report will be completed after the final data are received and validated. The NDEP assumes the "report" will be similar to the Technical Memorandum submitted for Parcels A and B and will contain a human health risk assessment (HHRA). If this assumption is not correct, please contact the NDEP to clarify.
- Please note that if any confirmation samples exhibit elevated concentrations and additional remedial actions are necessary, TRX should contact the NDEP and modify this Work Plan per the USEPA Triad methodology.
- Based on the proposed additional sampling prior to the commencement of remedial action, the NDEP understands that the submittal of the completion report/technical memorandum will be delayed approximately 6 to 8 weeks. Please note that TRX should give further consideration to the collection and analysis of additional samples, if the acquisition of a No Further Action Determination is time sensitive.

Please contact the undersigned with any questions at [sharbour@ndep.nv.gov](mailto: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, DAQEM, PO Box 551741, Las Vegas, NV, 89155-1741  
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Mark Paris, Landwell, 875 West Warm Springs, Henderson, NV 89011  
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Curt Richards, Olin Corporation, 3855 North Ocoee Street, Suite 200, Cleveland, TN 37312  
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Joe Kelly, Montrose Chemical Corporation of CA, 600 Ericksen Avenue NE, Suite 380, Bainbridge Island,  
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Paul Black, Neptune and Company, Inc., 8550 West 14<sup>th</sup> Street, Suite 100, Lakewood, CO 80215