

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" Sites,
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 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
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Ranajit Sahu, BRC, 311 North Story Place, Alhambra, CA 91801
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Craig Wilkinson, TIMET, PO Box 2128, Henderson, Nevada, 89009-7003
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George Crouse, Syngenta Crop Protection, Inc., 410 Swing Road, Greensboro, NC 27409
Nick Pogoncheff, PES Environmental, 1682 Novato Blvd., Suite100, Novato, CA 94947
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Paul Black, Neptune and Company, Inc., 8550 West 14th Street, Suite 100, Lakewood, CO 80215