



STATE OF NEVADA
Department of Conservation & Natural Resources
DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor
Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

November 24, 2009

Susan Crowley (Contractor)
C/O Tronox LLC
PO Box 55
Henderson, NV 89009

Re: **Tronox LLC (TRX)**
NDEP Facility ID #H-000539
Nevada Division of Environmental Protection (NDEP) Response to:
Memorandum: Scope for Additional Sampling – Phase B Investigation, Area 1 (including
subsequently submitted supporting data and figures)
Dated November 19, 2009

Dear Ms. Crowley,

The NDEP has received and reviewed TRX's above-identified Memorandum and finds that the document is acceptable with the following exceptions noted for the administrative record:

- NDEP notes that borings RSAI2 and RSAI3 exhibited hexachlorobenzene concentrations greater than the Basic Comparison Level (BCL) at 10 feet below ground surface (fbgs). TRX should consider including sampling of these locations below 10 fbgs (similar to the sampling proposed as part of this pre-confirmation sampling effort). Otherwise, TRX will need to conduct post-excavation confirmation sampling in this area. TRX should note that the second alternative may result in the need for additional rounds of excavation.

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
Fax: 702-486-5733

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
Susan Crowley, Crowley Environmental LLC, 366 Esquina Dr, Henderson NV 89014
Mike Skromyda, Tronox LLC, PO Box 55, Henderson, NV 89009
Deni Chambers, Northgate Environmental, 300 Frank H. Ogawa Plaza, Suite 510, Oakland, CA 94612
Barry Conaty, Holland & Hart LLP, 975 F Street, N.W. Suite 900, Washington, D.C. 20004
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, Planning Manager, Air Quality and Environmental Management, 500 S. Grand Central
Pkwy, 1st floor, P.O. Box 555210, Las Vegas, NV 89155-5210
Ranjit 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., Suite 100, 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, 10733 Wave Crest Court, Stockton, CA 95209
Joe Kelly, Montrose Chemical Corporation of CA, 600 Ericksen Avenue NE, Suite 380, Bainbridge Island,
WA 98110
Jeff Gibson, AMPAC, 3883 Howard Hughes Pkwy, Ste 700, Henderson, NV 89169
Larry Cummings, AMPAC, 3883 Howard Hughes Pkwy, Ste 700, Henderson, NV 89169
Teri Copeland, Neptune and Company, Inc., 5737 Kanan Road #182, Agoura Hills CA 91301
Joanne Otani, 919 Monroe St, Santa Rosa CA 95404
Paul Hackenberry, Hackenberry Associates, LLC, 550 W. Plumb Lane B425, Reno, NV 89509
Paul Black, Neptune and Company, Inc., 8550 West 14th Street, Suite 100, Lakewood, CO 80215
Mike Balshi, Neptune and Company, Inc., 8550 West 14th Street, Suite 100, Lakewood, CO 80215
Dave Gratson, Neptune and Company, Inc., 1505 15th Street, Suite B, Los Alamos, NM 87544
Kurt Fehling, The Fehling Group, LLC, 936-B Seventh Street, #181, Novato, CA 94945