



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

March 29, 2010

Matt Paque
Tronox LLC
3301 NW 150th
Oklahoma City, OK 73134

Re: **Tronox LLC (TRX)**
NDEP Facility ID #H-000539
Nevada Division of Environmental Protection (NDEP) Response to:
*Technical Memorandum Regarding General Comment #1 of NDEP's March 17, 2010
Comments on Pre-Confirmation Sampling Work Plan*
Dated: March 22, 2010

Dear Mr. Paque,

The NDEP has received and reviewed TRX's above-identified Deliverable and provides comments in Attachment A. A revised Deliverable should be submitted **by April 12, 2010** based on the comments found in Attachment A. TRX should additionally provide an annotated response-to-comments letter as part of the revised Deliverable.

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

EC: Jim Najima, NDEP, BCA, Carson City
Brian Rakvica, NDEP, BCA, Las Vegas
Greg Lovato, Bureau of Corrective Actions, NDEP, Carson City, NV



CC: Keith Bailey, Environmental Answers LLC, 3229 Persimmon Creek Drive, Edmond, OK 73013
Susan Crowley, C/O Tronox LLC, PO Box 55, Henderson, NV 89009
Mike Skromyda, Tronox LLC, PO Box 55, Henderson, NV 89009
Michael J. Foster, Tronox LLC, P.O. Box 268859, Oklahoma City, OK 73126-8859
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
Joe McGinley, McGinley & Associates, 815 Maestro Dr, Reno, NV 89511
Joe McGinley, McGinley & Associates, 8275 S Eastern Ave, Ste 200, Las Vegas, NV 89123
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

Attachment A

1. Page 1, 4th bullet, TRX should clarify if the soil at the bottom of the excavation will represent the surface concentrations in all cases or only in cases where no backfill is used.
2. Page 2, 1st bullet, TRX states that “existing data for soil that will be excavated will be replaced with clean data from pre-confirmation samples.” TRX should also specify how this will be calculated if there are multiple pre-confirmation samples. Please note that this applies to the examples provided in the remainder of the document. For example,
 - a. Page 2, Example #1, there are often several samples which represent the 0-3’ soil interval in this example. NDEP needs to understand how TRX plans to handle this data for use in the risk assessment.
3. Page 3, TRX states “Example #3 – Excavation to 8 feet bgs for HCB. In this case, a pre-confirmation sample will have been collected at 8 feet bgs and analyzed for the full suite of SVOCs. The data from this sample will be substituted for the SVOC data collected in shallower samples from this location. However, unlike the previous two examples, in this case, the existing soil data collected in shallower samples for the remaining chemicals will be eliminated from consideration, and the existing data from samples collected 10 feet bgs will be used to represent the concentration in what will be near-surface soil (i.e., the upper 2 feet of soil) after the excavation is complete.
 - a. NDEP would like to clarify that for the remaining chemicals, if a deeper soil sample (e.g., at 20 feet below ground surface (bgs)) does not currently exist, then the existing soil data from samples collected at 10 feet bgs would represent the entire 0-10 feet bgs interval.