



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

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

June 9, 2010

Matt Paque
Tronox LLC
PO BOX 268859
Oklahoma City, OK 73134

Re: **Tronox LLC (TRX)**
NDEP Facility ID #H-000539
Nevada Division of Environmental Protection (NDEP) Response to:
Removal Action Work Plan, for Phase B Soil Remediation of Remediation Zones TZ-B through RZ-E, Tronox LLC, Henderson, Nevada
Dated: Revised May 28, 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 June 23, 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,

for

Shannon Harbour, P.E.
Staff Engineer III
Bureau of Corrective Actions
Special Projects Branch
NDEP-Las Vegas Office
Fax: 702-486-5733

SH:GL:gl



EC: Jim Najima, Bureau of Corrective Actions, NDEP
Greg Lovato, Bureau of Corrective Actions, NDEP
Mike Skromyda, Tronox LLC
Michael J. Foster, Tronox LLC
Keith Bailey, Environmental Answers LLC
Deni Chambers, Northgate Environmental
Brian Rakvica, McGinley and Associates
Paul Black, Neptune and Company, Inc.
Kelly Black, Neptune and Company, Inc.
Teri Copeland, Neptune and Company, Inc.
Kurt Fehling, The Fehling Group, LLC
Joanne Otani,
Julie Panko, ChemRisk, Inc.
Barry Conaty, Holland & Hart LLP
Brenda Pohlmann, City of Henderson
Mitch Kaplan, U.S. Environmental Protection Agency, Region 9
Ebrahim Juma, Planning Manager, Air Quality and Environmental Management
Joe McGinley, McGinley & Associates
Ranajit Sahu, BRC
Rick Kellogg, BRC
Mark Paris, Landwell
Craig Wilkinson, TIMET
Kirk Stowers, Broadbent & Associates
George Crouse, Syngenta Crop Protection, Inc.
Nick Pogoncheff, PES Environmental
Lee Erickson, Stauffer Management Company
Michael Bellotti, Olin Corporation
Curt Richards, Olin Corporation
Paul Sundberg, Montrose Chemical Corporation
Joe Kelly, Montrose Chemical Corporation of CA
Jeff Gibson, AMPAC
Larry Cummings, AMPAC

CC: Susan Crowley, C/O Tronox LLC, PO Box 55, Henderson, NV 89009

Attachment A

1. Section 6.0, page 24, NDEP has the following comments:
 - a. 1st paragraph, last sentence, please remove “and cannot be remediated at this time” as TRX should provide discussion on the feasibility of remediation in the separate Environmental Covenants document.
 - b. 2nd paragraph, 1st sentence, please revise this sentence by replacing “required” with “proposed”.
2. Response to Comments (RTC), Raw Text, RTC 4, the requested map showing the location of the Manganese Tailings Cross-Sections was not included in the errata packet. Please provide this map.
3. RTC, Perimeter Air Monitoring Plan, RTC 1.a and Appendix B, TRX should note that the revised Table 1 does not contain the OCPs, perchlorate or PCBs. TRX should indicate in which RZs they intend to monitor for these chemicals.