



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 20, 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:
TRX Letter Submittal RE: Manganese Tailings Pile Confirmation Sampling
Dated: July 9, 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 July 27, 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 775-687-9332.

Sincerely,

Shannon Harbour, P.E.
Staff Engineer III
Bureau of Corrective Actions
Special Projects Branch
NDEP-Carson City Office
Fax: 775-687-8335

SH:sh

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
Susan Crowley, Tronox LLC (Contractor)
Deni Chambers, Northgate Environmental
Brian Rakvica, McGinley and Associates
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
Ranjit Sahu, BRC
Rick Kellogg, BRC
Mark Paris, Landwell
Craig Wilkinson, TIMET
Kirk Stowers, Broadbent & Associates
Victoria Tyson, Tyson Contracting
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
Teri Copeland, Neptune and Company, Inc.
Kurt Fehling, The Fehling Group, LLC
Joanne Otani

CC: Ebrahim Juma, Planning Manager, Air Quality and Environmental Management
Susan Crowley, C/O Tronox LLC, PO Box 55, Henderson, NV 89009
Lee Erickson, Stauffer Management Company

Attachment A

1. TRX should provide a brief background section discussing a CSM-based description of the manganese tailings pile area including history and a list of wastes and potential contaminants that were placed or occurred in this area. Please note that the liquids discovered during the excavation should be discussed for potential impact and targeted sampling.
2. During the Phase B Source Area Investigation, TRX collected samples from the surface (0.0-0.5 fbg), 5 fbg, and 10 fbg; however, TRX is only proposing to sample at the surface and 0.5-1.0 fbg interval. TRX should conduct the sampling of this area in a manner consistent with previous sampling that will be used in a Health Risk Assessment for this Remediation Zone.
3. TRX should justify the elimination of chemical analytical suites from the Phase B broad suite analysis using CSM-based discussion. All chemical suites used in Phase B should be sampled unless otherwise approved by the NDEP.
4. TRX should acknowledge and discuss the former cooling tower that is located in the manganese tailings area and how this area will be characterized.
5. TRX should also propose sampling on the southern boundary of the manganese tailings area.
6. Figure 1, NDEP provides the following comments:
 - a. Please clarify what the Manganese Boring Locations are and if samples were collected, please present the results.
 - b. Please provide the Phase B results in this Figure.