

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 27, 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: REVISED Hydrogeologic Modeling Work Plan, Tronox LLC Henderson, Nevada Dated: June 7, 2010

Dear Mr. Paque,

The NDEP has received and reviewed TRX's above-identified Deliverable and finds that the document is acceptable with the following comments noted for the Administrative Record:

- Section 2.1.2, page 4, 5th bullet, TRX should note that POSSM also injects treated groundwater from the GWTS.
- Section 5.4.3.2, page 15, last sentence of section, this would be the preferred alternative because it involves fewer assumptions.
- Figure 3. The schematic CSM indicates "minimal impact" to groundwater. TRX should note that there is neither a human health nor ecological risk assessment to support this conclusion.
- 4. The NDEP recommends interim Deliverables to avoid delays at the end of the modeling effort caused by re-doing model development and/or calibration tasks. (For example the following Milestone reviews could be conducted: Conclusion of Conceptual Model Development, Completion of Flow Model, etc.)

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

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Mike Skromyda, Tronox LLC

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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

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George Crouse, Syngenta Crop Protection, Inc.

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Lee Erickson, Stauffer Management Company

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Joe Kelly, Montrose Chemical Corporation of CA

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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