



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:

1. Section 2.1.2, page 4, 5<sup>th</sup> bullet, TRX should note that POSSM also injects treated groundwater from the GWTS.
2. Section 5.4.3.2, page 15, last sentence of section, this would be the preferred alternative because it involves fewer assumptions.
3. 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](mailto: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

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Brian Rakvica, McGinley and Associates  
Barry Conaty, Holland & Hart LLP  
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Mitch Kaplan, U.S. Environmental Protection Agency, Region 9  
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