



STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

August 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) Additional Response to:
Removal Action Work Plan for Phase B Soil Remediation zones RZ-B through RZ-E,
Tronox LLC, Henderson, Nevada
Dated: May 4, 2010

Dear Mr. Paque,

The NDEP has reviewed TRX's above-identified Deliverable (RAW) based on discussions during a July 30, 2010 WebEx meeting between NDEP and TRX. TRX should submit errata to the RAW that clarifies that the development of excavation cutlines will be based on the following:

1. Site-specific Risk Based Remediation Concentration (RBRC) for dioxins/furans (in terms of a 2,3,7,8-TCDD TEQ) of 2,700 ng/kg (ppt).
2. Target Remediation Goal of 7.2 mg/kg (ppm) for arsenic.
3. Basic Comparison Levels (BCLs) for all other chemicals.

The above-requested errata to the RAW should be submitted **by August 12, 2010** in conjunction with previously requested errata (NDEP letter dated July 29, 2010). 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
Carolyn Tanner, AG's Office, Carson City, NV
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
Paul Hackenberry, Hackenberry Associates, LLC
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
Brian Giroux, McGinley and Associates
Dave Gratson, Neptune and Company, Inc.
Mike Balshi, Neptune and Company, Inc.
Julie Panko, ChemRisk, Inc.

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