



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 10, 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:  
*Tronox Phase B Remediation Program Schedule*  
Dated: August 4, 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 August 13, 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](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

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

CC: Susan Crowley, C/O Tronox LLC, PO Box 55, Henderson, NV 89009  
Lee Erickson, Stauffer Management Company

### Attachment A

1. Please revise the schedule to reflect the Milestones established by NDEP in a separate letter dated August 10, 2010.
2. Please clarify whether the excavation activities for RZ-C and RZ-E will be completed by the same Contractor selected for RZ-B and RZ-D excavation activities.
3. NDEP was under the impression that debris removal from the basements of Unit Buildings 1 and 2 would last two months. Please clarify why 10 days is shown on the schedule. Additionally, NDEP has been notified that commencement of this work has been delayed until August 17, 2010. Please revise the schedule as necessary to show the impact of these delays.
4. Excavation activities for RZ-B should be independent of and thereby not delayed by the work conducted for Unit Buildings 1 and 2.
5. The current schedule indicates that excavation will be occurring simultaneously in RZ-B and RZ-D. Please clarify what happens after work is completed in RZ-B (i.e. will the additional crew/equipment be moved to RZ-D so that remediation continues on an accelerated schedule.)
6. At a minimum, excavation activities for RZ-C should commence immediately after work is completed in RZ-D. Please revise the schedule so that work in RZ-C commences no later than October 21, 2010. Please note that this will also impact the start date for work in RZ-E. Please revise the start date for work in RZ-E to no later than December 2, 2010.
7. As TRX's request for Environmental Covenants impact the excavation limits proposed for the Site, the current submittal date of October 20, 2010 for the Environmental Covenants document is not acceptable. This document should be submitted to the NDEP by **August 31, 2010** and should at a minimum provide all necessary back-up information for the selection of the proposed boundary
8. TRX removed the Soil Flushing Task from the Schedule. Please include the schedule for this Task and additionally include a schedule for In-Situ Bioremediation. Please include an update on the status of these Tasks in the response-to-comments.