



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 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.