



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 20, 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:  
*Surface Dioxin/furan and HCB Results – Transmittal of Draft Figures – Working Document*  
Dated: August 2, 2010

Dear Mr. Paque,

The NDEP has received and reviewed TRX's above-identified Deliverable and provides the following comments noted for the Administrative Record:

1. TRX should incorporate this data into the Revised Excavation Plans for Remediation Zone (RZ)-C and RZ-E for future submittals.
2. NDEP included this data in the review and response for the Revised Excavation Plan for RZ-D (dated July 26, 2010). NDEP responded to RZ-D Deliverable with conditional approval with comments in a letter dated August 11, 2010.
3. NDEP will include this data in the review and response for the Revised Excavation Plan for RZ-B (dated August 20, 2010).
4. TRX should note that the additional sampling is not an acceptable reason for delay of the remediation schedule. Excavation should continue as scheduled and approved regardless of the timing for the receipt of the results of the additional sampling. (For guidance on the approved schedule as of August 20, 2010, please see NDEP's letter dated August 20, 2010 RE: *Response to August 10, 2010 Nevada Division of Environmental Protection (NDEP) Comments on Tronox Phase B Remediation Program Schedule, Dated August 4, 2010.*)

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:gl:sh

EC: Jim Najima, Bureau of Corrective Actions, NDEP  
Greg Lovato, Bureau of Corrective Actions, NDEP  
Brenda Pohlmann, City of Henderson  
Mitch Kaplan, U.S. Environmental Protection Agency, Region 9  
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  
Joe McGinley, McGinley & Associates  
Barry Conaty, Holland & Hart LLP  
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Rick Kellogg, BRC  
Mark Paris, Landwell  
Craig Wilkinson, TIMET  
Kirk Stowers, Broadbent & Associates  
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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  
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Jeff Gibson, AMPAC  
Larry Cummings, AMPAC  
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Joe Leedy, Clean Water Team  
Kathryn Hoffmann, Clean Water Team  
Kurt Fehling, The Fehling Group, LLC

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