



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:

Revised Work Plan for Additional Sampling of a Portion of a Former Trade Effluent Pond Berm in the Northwest Portion of Remediation Zone D, Tronox Facility, Henderson Nevada

Dated: July 28, 2010

And

Errata to Revised Work Plan for Additional Sampling of a Portion of a Former Trade Effluent Pond Berm in the Northwest Portion of Remediation Zone D, Tronox Facility, Henderson Nevada

Dated: August 6, 2010

And

Errata: Additional TEP Berm Data (Spreadsheet)

Dated: August 18, 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 conditions and/or comments noted for the Administrative Record:

1. TRX states that the radionuclide data for this area was compared to the TIMET background dataset and that TRX is currently preparing a background comparison with the RZ-A background dataset. NDEP is deferring a decision about the elimination of the radionuclide analysis until the background comparison with the RZ-A dataset has been completed and reviewed by the NDEP.
2. The following analyses should be conducted for all samples collected for the referenced area (including those collected beneath the berm unless otherwise noted):
 - a. Dioxins/furans
 - b. SVOCs (including HCB)
 - c. Metals
 - d. Perchlorate
 - e. Organochlorine pesticides (OCPs)
 - f. Asbestos (berm only)



3. As TRX has indicated in other submitted documents, visual indications of asbestos containing materials (ACM) have been observed within the TEP berms; therefore, asbestos should be sampled throughout the berm as indicated above. Additionally, NDEP acknowledges that sampling for asbestos in all of the berm samples regardless of depth will require minor modification of the SOP in order to collect the composite samples required for asbestos sampling.

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: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
Ebrahim Juma, Air Quality and Environmental Management
Kathryn Hoffmann, Air Quality and Environmental Management
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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Craig Wilkinson, TIMET
Kirk Stowers, Broadbent & Associates
Victoria Tyson, Tyson Contracting
George Crouse, Syngenta Crop Protection, Inc.
Nick Pogoncheff, PES Environmental
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Curt Richards, Olin Corporation
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CC: Susan Crowley, C/O Tronox LLC, PO Box 55, Henderson, NV 89009
Lee Erickson, Stauffer Management Company