



STATE OF NEVADA  
Department of Conservation & Natural Resources  
DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor  
Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

November 15, 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:  
*Technical Memorandum RE: Proposed Evaluation Procedures for Parcels C, D, F, G, H*  
*Risk Evaluation, Tronox Facility, Henderson, Nevada*  
Dated: November 10, 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 comments noted for the Administrative Record:

1. Sections 2 and 3, pages 2-3, TRX should note that asbestos should be evaluated within the risk assessment, not outside it as these section titles seem to imply.
2. Section 3, pages 3-4, TRX indicates that the commercial incremental lifetime cancer risk (ILCR) and the hazard index (HI) are universally higher than the construction worker; NDEP does not concur with this assumption as the ILCR and HI depend on the contaminants that are present. TRX should calculate the quantitative risk for both scenarios.

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  
William Knight, Bureau of Corrective Actions, NDEP  
Brenda Pohlmann, City of Henderson



Mitch Kaplan, U.S. Environmental Protection Agency, Region 9  
Jay A. Steinberg, Tronox Henderson Trust  
Allan Delorme, ENVIRON  
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  
Ranjit Sahu, BRC  
Rick Kellogg, BRC  
Lee Farris, 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  
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Teri Copeland, Neptune and Company, Inc.  
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Joanne Otani  
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CC: Susan Crowley, C/O Tronox LLC, PO Box 55, Henderson, NV 89009  
Lee Farris, BRC, 875 W. Warm Springs Road, Henderson, NV 89011  
Lee Erickson, Stauffer Management Company