



environmental management, inc.

From: Deni Chambers
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Date: June 22, 2010

To: Shannon Harbour, P.E.
Nevada Division of Environmental Protection

RE: Response to June 9, 2010 Nevada Division of Environmental Protection
Comments on *Removal Action Work Plan for Phase B Soil Remediation of
Remedial Zones RZ-B through RZ-E, Tronox LLC, Henderson, Nevada, revised
May 28, 2010*

RESPONSE TO COMMENTS

Northgate Environmental Management, Inc. (Northgate) submits this Response to Comments on the *Removal Action Work Plan for Phase B Soil Remediation of Remedial Zones RZ-B through RZ-E* (RAW) on behalf of Tronox LLC (Northgate May 28, 2010). Tronox has reviewed the June 9, 2010 Nevada Division of Environmental Protection (NDEP) comments and has revised the RAW document accordingly. As you know, the RAW is a collection of documents including the RAW text and figures, the Perimeter Air Monitoring Plan (PAMP), the Stormwater Pollution Prevention Plan (SWPPP), the Table of Contents for the Health and Safety Plan and the Transportation Plan. NDEP prepared separate sets of comments for the RAW text and the PAMP. No comments were received for the SWPPP or the Transportation Plan. Our responses are arranged below in a format similar to NDEP's. The requested text changes and additional figure are contained in Errata 2 to the RAW, which accompanies this response.

RAW TEXT

1. *Section 6.0, page 24, NDEP has the following comments:*

- a. *1st paragraph, last sentence, please remove "and cannot be remediated at this time" as TRX should provide discussion on the feasibility of remediation in the separate Environmental Covenants document.*

Response: Section 6.0, Page 24 has been revised by deleting "and cannot be remediated at this time".

- b. *2nd paragraph, 1st sentence, please revise this sentence by replacing "required" with "proposed".*

Response: Section 6.0, Page 24 has been revised by deleting "required" and replacing it with "proposed".

2. *Response to Comments (RTC), Raw Text, RTC 4, the requested map showing the location of the Manganese Tailings Cross-Sections was not included in the errata packet. Please provide this map.*

Response: Figure 1, which shows the locations of the cross-sections, has been included in the accompanying Errata 2.

3. *RTC, Perimeter Air Monitoring Plan, RTC 1.a and Appendix B, TRX should note that the revised Table 1 does not contain the OCPs, perchlorate or PCBs. TRX should indicate in which RZs they intend to monitor for these chemicals.*

Response: Table 1 does not include OCPs, perchlorate and PCBs, as these chemicals are not likely to be selected as COCs for air sampling. Although remediation of a chemical may be identified in a Remediation Zone (RZ), the soil concentrations and/or area and location of impact may not be sufficient to warrant chemical-specific analysis of that particular chemical at the perimeter boundary if the chemical is not likely to significantly contribute to potential off-site air concentrations over the five month period of the remediation activities. Addenda to the RZ-specific excavation plans will be submitted to address specific COCs for each zone based on the evaluation of the data. As the objective of the air monitoring program is to evaluate the effectiveness of the engineering control for mitigation off-site airborne emissions, each RZ excavation will focus on those constituents that will provide the most appropriate information for meeting this objective. It is important to note that PM10 monitoring will be conducted daily and has been selected to provide a reasonable indication of particulate concentration being contributed to the ambient environment by intrusive activities in these areas.

