



environmental management, inc.

From: Deni Chambers, CEM
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Date: December 7, 2010

To: Shannon Harbour,
Nevada Division of Environmental Protection (NDEP)

RE: Response to NDEP's November 29, 2010 Comments on *Excavation Plan for Phase B Soil Remediation of RZ-E*, dated November 3, 2010;
Errata pages for RZ-E Excavation Plan, dated November 4, 2010;
Conference Call Minutes, dated November 9, 2010; and
Errata to RZ-E Excavation Plan: Figure 1 and Table 1; dated November 15, 2010

1. *Section 1.3, page 5 and Section 4.4, page 10, TRX continues to defer the issue of how risk assessments will be conducted in areas where backfill is not proposed to be placed. Therefore, NDEP provides the following:*
 - a. *If excavation that will not be backfilled is less than or equal to 5 feet below ground surface (fbgs), TRX may use the current 10 fbgs data to represent the new 0 – 10 fbgs range.*
 - b. *Excavations greater than 5 fbgs either need to be backfilled to pre-excavation grades or a post-excavation 10 fbgs sample must be collected and used in the risk assessment.*

Response:

Tronox intends to follow the NDEP proposed criteria contained in this comment when preparing the health risk assessment to address those areas of the Site where the excavation area will not be fully backfilled.

2. *Figure 1 (errata Figure 1 dated November 12, 2010): NDEP provides the following comments:*
 - a. *RZ-E-02: based on the additional data provided for SSAM3-02, the depth of excavation should be established at 19 feet below ground surface (fbgs).*
 - b. *RZ-E-08: the eastern excavation limit should be established at the mid-point between BDT-S-5 and SSAM5-04.*
 - c. *SSAL8-02: based on the data from this boundary sample, TRX should excavate as vertically as possible at the eastern property boundary to 5 fbgs.*

Response:

- a. As noted in this comment, the depth of excavation for RZ-E-02 has been changed to 19 feet.
- b. A review of the boundary between BDT2-S-5 and SSAM5-04 concludes that the boundary is half way between these boring locations.

- c. In response to this comment, a new area (RZ-E-16B) has been added and the stated depth is 5 feet. When this area is excavated, the excavation will be as vertical as possible at the property line.

Please contact us with any questions.

