

February 2, 2005

Ms. Susan Crowley  
Tronox LLC  
PO Box 55  
Henderson, Nevada 89009

Re: **Tronox LLC (Tronox)**  
**NDEP Facility ID #H-000539**  
Nevada Division of Environmental Protection Response to:  
*Semi-Annual Performance Report – Chromium Mitigation Program*  
dated January 27, 2006

Dear Ms. Crowley,

The NDEP has received and reviewed Tronox's letter identified above and provides comments in Attachment A.

If there are any questions please do not hesitate to contact me.

Sincerely,

Brian A. Rakvica, P.E.  
Supervisor  
Bureau of Corrective Actions  
Special Projects Branch  
NDEP-Las Vegas Office

Ms. Susan Crowley

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CC: Jim Najima, NDEP, BCA, Carson City  
Jeff Johnson, NDEP, BCA, Carson City  
Shannon Harbour, NDEP, BCA, Las Vegas  
Todd Croft, NDEP, BCA, Las Vegas  
Barry Conaty, Akin, Gump, Strauss, Hauer & Feld, L.L.P., 1333 New Hampshire Avenue, N.W.,  
Washington, D.C. 20036  
Brenda Pohlmann, City of Henderson, PO Box 95050, Henderson, NV 89009  
Mitch Kaplan, U.S. Environmental Protection Agency, Region 9, mail code: WST-5,  
75 Hawthorne Street, San Francisco, CA 94105-3901  
Rob Mrowka, Clark County Comprehensive Planning, PO Box 551741, Las Vegas, NV, 89155-  
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Ranjit Sahu, BEC, 875 West Warm Springs Road, Henderson, Nevada 89015  
Craig Wilkinson, TIMET, PO Box 2128, Henderson, Nevada, 89009-7003  
Kirk Stowers, Broadbent & Associates, 8 West Pacific Avenue, Henderson, Nevada 89015  
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Joe Kelly, Montrose Chemical Corporation of CA, 600 Ericksen Avenue NE, Suite 380,  
Bainbridge Island, WA 98110

### Attachment A

1. General comment, the NDEP is providing a number of comments in this report to streamline the report format and to provide the information in a manner that is more functional. It is expected that the details of the revised format will be discussed in a meeting or telephone call. It is suggested that Tronox develop a series of examples of the revised figures as discussed below. The format of these figures should be discussed prior to the development of the next report.
2. General comment, the text of the report does not describe the configuration or operational details of the chromium treatment system. The NDEP requests that Tronox provide this detail in the next semi-annual report. Examples of information that should be included are as follows:
  - a. A flow diagram that shows the path that chromium impacted water follows for treatment with the end of the description being the input to the fluidized bed reactor (FBR), which is the treatment system for perchlorate-impacted waters.
  - b. A description of the treatment that occurs for the water collected from the Athens road well field.
  - c. A description of the treatment of the water from the on-site well field and the water from pond GW-11.
3. General comment, please discuss the current status of any plans to perform source area removal or to address vadose zone contamination.
4. Introduction, page 1, Tronox states that “the treated groundwater from the chromium mitigation system is now piped to an onsite impoundment where it is ultimately treated and discharged to Las Vegas Wash under NPDES permit.” It is the understanding of the NDEP that water is extracted from pond GW-11 at a low flow rate (~10 gpm) for supplemental chromium treatment prior to discharge to the FBR. It is the understanding of the NDEP that water treated for chromium impacts from the Athens Road wellfield goes directly to the FBR (not the on-site impoundment). It is also the understanding of the NDEP that water treated for chromium impacts from the on-site well field also discharges to the FBR system via surge tanks. Please advise if this is the correct understanding and clarify the report per the above comment.
5. Figure 1, the references on Figure 1 to the plates appear to be incorrect and should be revised.
6. Figures 2 and 9, it is suggested that these two figures be resolved to a singular figure.
7. Figure 5, based on the depiction of the saturated alluvium it appears that the on-site extraction could be optimized. Please discuss.
8. Table 4, this table should specify where the treated outflow is discharged to.
9. Plates 1 and 3, it is suggested that these two plates be resolved into one plate at a different scale.
10. Plates 2 and 4, it is suggested that these two plates be resolved into one plate at a different scale.
11. Appendix A, it is suggested that this data be included on disk in the future. It is requested that the data be presented in the future in Appendix A graphically as a

function of water level versus time for the monitoring wells. The NDEP is open to discussion regarding presentation of this data.

12. Appendix B, the NDEP has the following comments:

- a. This appendix presents graphical representations of select monitoring wells chromium concentration versus time. This type of information is presented in several formats throughout the report and it is the desire of the NDEP to simplify the format of the report. It is suggested that Appendix B include the same type of graphical depiction, however, it is suggested that this include the same wells as included in Appendix A. The selection of these wells is open for discussion.
- b. The change discussed above would remove the need for figures 7, 8, 10, and 11. The presentation of the data on tables 1 and 3 should be modified. It is suggested that the data for all monitoring wells covered under the revised Appendices B and C be included in the report. Also, it is not necessary to present the data for such a long period of time. Perhaps the past 1-2 years of data could be presented. The NDEP is open to discussions regarding the format of these tables.
- c. Figure 13 should also be moved to Appendix B.