

September 12, 2007

Susan Crowley
Tronox LLC
PO Box 55
Henderson, Nevada 89009

Re: **Tronox LLC (TRX)**
NDEP Facility ID #H-000539
Nevada Division of Environmental Protection Response to:
*Phase 2 Sampling and Analysis Plan to Conduct Soil Characterization, Tronox
Parcels "F" Site, Henderson, Nevada*
Dated August 28, 2007

Dear Ms. Crowley,

The NDEP has received and reviewed TRX's Phase 2 Sampling and Analysis Plan (SAP) identified above and provides comments in Attachment A. A revised Phase 2 report should be submitted based on the comments found in Appendix A. Please advise the NDEP regarding the schedule for this resubmittal. TRX should additionally provide an annotated response-to-comments letter as part of the Revised Phase 2 submittal.

Please contact the undersigned with any questions at (702) 486-2850 x 240 or sharbour@ndep.nv.gov.

Sincerely,

Shannon Harbour, P.E.
Staff Engineer III
Bureau of Corrective Actions
Special Projects Branch
NDEP-Las Vegas Office

CC: Jim Najima, NDEP, BCA, Carson City
Brian Rakvica, NDEP, BCA, Las Vegas
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Kirk Stowers, Broadbent & Associates, 8 West Pacific Avenue, Henderson, Nevada 89015
George Crouse, Syngenta Crop Protection, Inc., 410 Swing Road, Greensboro, NC 27409
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Lee Erickson, Stauffer Management Company, P.O. Box 18890, Golden, CO 80402
Chris Sylvia, Pioneer Americas LLC, PO Box 86, Henderson, Nevada 89009
Paul Sundberg, Montrose Chemical Corporation, 3846 Estate Drive, Stockton, California
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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 Figures do not show the relationship of Parcel “F” to surrounding source areas. TRX has identified most of these source areas in their CSM: however, transparency is lacking in this document. Please provide a map showing Parcel “F” in comparison to these source areas.
2. Background, the NDEP provides the following comments:
 - a. TRX indicates that the aboveground storage tanks (ASTs) located south of the Site “...are at a different elevation – and therefore there is limited possibility that spills from the tanks would have affected the surface to 10 foot elevation of the Site.” The text does not specify whether the tanks are higher or lower than the Site. The NDEP notes that these tanks are higher than Parcel F. It is unclear how this difference in elevation would prevent a release from these ASTs to the Site. Please revise and clarify this statement.
 - b. TRX states that this Site is in “the vicinity of BMI Industrial Companies”. The Site is located on TRX property and in the vicinity of other BMI Industrial Companies. Please revise the text accordingly.
 - c. TRX states that several monitoring wells are located within the Site. TRX additionally states that monitoring well data from TR-6 indicated that concentrations of monitored chemicals are “generally low to non-detect”. Please provide a table listing the concentration data available from all of the monitoring wells located on and in the immediate vicinity of the Site.
 - d. TRX states that the concentration of chloroform in TR-6 was 2,500 ppb. Please provide a discussion on the vapor intrusion pathway in relation to future land use including development and construction activities.
 - e. TRX proposes to focus sampling on the upper five feet of soil since five feet of fill will be imported to bring the Site to grade for construction. Please note that deed restrictions may need to be placed on the Site to facilitate a No Further Action Determination (NFAD).
3. Scope of Work, Task 1: Field Implementation, see the following comments:
 - a. The reference for the BRC Field Sampling and Standard Operating Procedures (FSSOP) should be updated.
 - b. Please note and revise text accordingly that dioxins/furans are listed on the TRX SRC list dated March 2006.
 - c. The reference for the quality assurance project procedure (QAPP) should be updated.
4. Scope of Work, Task 2: Data Evaluation, add SOP 40 to QAPP reference.
5. Schedule, 1st paragraph, please verify that the 28-day turn around time is applicable to all analytes (i.e.: asbestos, radionuclides).
6. Figure 2, the NDEP observed that judgmental samples are not located on all seemingly disturbed areas on the provided aerial photograph (e.g. disturbed area in grid F-B2 between TSB-FR-05 and TSB-FJ-03, disturbed area in grid F-B1 between TSB-FR-02 and TSB-FJ-04, etc.). Please add samples to these areas or discuss rationale for not sampling these areas in the text.
7. The following comments are based on a May 11, 2007 letter from the NDEP, Re: Nevada Division of Environmental Protection Response to: *Phase I Environmental Site Assessment – Approximately 182 Acres of land* (Phase I), dated March 5, 2007. These comments were

generated for portions of APN 178-12-401-009 and 178-13-101-002 as shown in Figure 3 of the Phase I (currently labeled as Parcel "F" in the Phase 2 SAP)

- a. Figure 3 in the Phase I, the NDEP has the following comments:
 - i. There appears to be large piles of debris that are not labeled on Figure 3. These had been removed by the time the NDEP had completed a site visit. It is necessary to correlate these piles to aerial photographs and investigate these areas, as necessary. Please discuss and illustrate on Figure 2 of the Phase II SAP.
 - ii. As noted above it is imperative that TRX identify and discuss the features displayed on Figure 3.
- b. There is a building foundation on Parcel "F", which appears similar to the peat building that was destroyed on the TIMET parcel. Please discuss what the use of this building was.
- c. TRX states that there is electrical equipment on Parcel "F" in a fenced area. The ownership and condition of this equipment needs to be assessed and reported in the Phase II SAP.
- d. It is the understanding of the NDEP that the former Hardesty Chemical/ AMECCO operation may have occurred directly south of Parcel "F". Please discuss this.
- e. A mobile aboveground storage tank is located on Parcel "F". Please discuss this.