

November 20, 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, Parcel "H" Site, Henderson, Nevada;*
Dated November 8, 2007

Dear Ms. Crowley,

The NDEP has received and reviewed TRX's above-identified report and provides comments below:

1. General comment, please provide an explanation for the reporting of groundwater concentration data collected in March 2006 instead of more recently collected data. (i.e. M120 was sampled in May 2007.) Please provide a revised table which presents all available data for these locations.
2. Scope of Work, Task 1, Page 4: please add judgmental samples in the vicinity of wells M120 and M121 to address the elevated concentrations of various chemicals in these wells. The NDEP believes that the source of these chemicals has not yet been identified.

A revised Sampling and Analysis Plan should be submitted based on these comments. 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 sharbour@ndep.nv.gov or (702) 486-2850 x 240.

Sincerely,

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

SH:bar:sh

CC: Jim Najima, NDEP, BCA, Carson City
Brian Rakvica, NDEP, BCA, Las Vegas
Keith Bailey, Environmental Answers LLC, 3229 Persimmon Creek Drive, Edmond, OK 73013
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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,
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