

January 8, 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:  
*Quarterly Performance Report for Remediation Systems Tronox LLC, Henderson,  
Nevada, July – September 2007*  
Dated November 28, 2007

Dear Ms. Crowley,

The NDEP has received and reviewed TRX's Quarterly Performance Report identified above and provides comments in Attachment A. TRX should address these comments in next Performance Report submittal and additionally provide an annotated response-to-comments letter as a part of this submittal. Please contact the undersigned with any questions at [sharbour@ndep.nv.gov](mailto: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  
Sally Bilodeau, ENSR, 1220 Avenida Acaso, Camarillo, CA 93012-8727  
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, 89155-1741  
Ranjit Sahu, BRC, 311 North Story Place, Alhambra, CA 91801  
Rick Kellogg, BRC, 875 West Warm Springs, Henderson, NV 89011  
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Craig Wilkinson, TIMET, PO Box 2128, Henderson, Nevada, 89009-7003  
Kirk Stowers, Broadbent & Associates, 8 West Pacific Avenue, Henderson, Nevada 89015  
George Crouse, Syngenta Crop Protection, Inc., 410 Swing Road, Greensboro, NC 27409  
Nick Pogoncheff, PES Environmental, 1682 Novato Blvd., Suite100, Novato, CA 94947  
Lee Erickson, Stauffer Management Company, P.O. Box 18890, Golden, CO 80402  
Michael Bellotti, Olin Corporation, 3855 North Ocoee Street, Suite 200, Cleveland, TN 37312  
Curt Richards, Olin Corporation, 3855 North Ocoee Street, Suite 200, Cleveland, TN 37312  
Paul Sundberg, Montrose Chemical Corporation, 3846 Estate Drive, Stockton, California 95209  
Joe Kelly, Montrose Chemical Corporation of CA, 600 Ericksen Avenue NE, Suite 380, Bainbridge Island,  
WA 98110

## Attachment A

1. Section 2.0, the NDEP has the following comments:
  - a. Page 2-1, last paragraph, TRX should identify which wells are selected for redevelopment.
  - b. The last paragraph on page 2-1 states that the effected wells will be redeveloped by early 2008 and the last paragraph on page 2-2 states that the wells should be redeveloped by mid-2008. Please reconcile.
  - c. Page 2-2, first paragraph, the NDEP notes that TRX has not provided evidence that supports these assumptions.
2. Section 3.0, page 3-2, first paragraph, TRX states that ARP-5 has been dry since December 2006. TRX should review the well log, well completion forms, etc. for ARP-5 to determine whether this piezometer is currently representative of the first water bearing zone (including the saturated portion of the Upper Muddy Creek formation). TRX could also proactively conduct this review for the other ARP wells to determine their likelihood of becoming dry and their continued representativeness of the first water bearing zone (including the saturated portion of the Upper Muddy Creek formation).
3. Section 4.0, third paragraph, TRX states that the monthly average perchlorate mass removed from the Seep Area Well Field has decreased because of an overall decrease in the perchlorate mass loading to the well field. Please provide more detail such as whether the perchlorate concentrations in the area have decreased, pumping rates have decreased, etc.
4. Table 5, please clarify whether “Capacity” means the maximum flow rate of each system component or the operational flow rate of each system component based on the current contaminant concentrations (i.e. the flow rates of each system component are limited by a maximum allowable contaminant concentration into the FBR remedial system).
5. Appendix C, the NDEP has the following comments to TRX Response to October 5, 2007 NDEP comments on the *Annual Remedial Performance Report for Chromium and Perchlorate* dated August 29, 2007:
  - a. Response to comments (RTC) 3.c, TRX states that the inclusion of the lithologic log information from CLD2-R indicated that there is a Muddy Creek high on the east side of the well field. According to Figure 2 of the August 29, 2007 *Annual Remedial Performance Report*, the elevation of the Muddy Creek interface is approximately 1,721 ft at I-K (easternmost well in Interceptor Well Field) and 1,717 ft at CLD2-R, which is lower than I-K; however, the top of the mound between these two wells is shown at 1,723 ft. Please clarify how TRX interpreted the existence of the mound between locations I-K and CLD2-R.
  - b. RTC 11.a, please see and respond to above-comment 4.a.
  - c. RTC 11.b, the NDEP believes that the text of a report should correspond to the information given in the figures provided in that report. Any changes made to the text of the report should be reflected in the corresponding figures.
  - d. TRC 11.c, TRX’s response does not address NDEP’s comment. Please provide analytical data to substantiate the statement that the three activated carbon vessels (indicated in Figure 7 – located in Appendix C) “remove organics which could harm bacteria”.
  - e. RTC 13, TRX states that “monitoring data for all of the wells sampled during the reporting period are provided in the Access accessible database in Appendix C.” Neither

Appendix C of the August 29, 2007 *Annual Remedial Performance Report* nor Appendix B of the November 28, 2007 *Quarterly Performance Report* have this database included. Only laboratory reports and field sheets are included in these appendices. Additionally, the NDEP has requested that the electronic version of the database include all historic and current site-related data. Please provide this data in the next performance report submittal.