March 26, 2008

Susan Crowley
Tronox LLC
PO Box 55
Henderson, Nevada 89009

Re: **Tronox LLC (TRX)**
NDEP Facility ID #H-000539
Nevada Division of Environmental Protection (NDEP) Response to:
Quarterly Performance Report for Remediation Systems, Tronox LLC, Henderson, Nevada, October – December 2007
Dated February 27, 2008

Dear Ms. Crowley,

The NDEP has received and reviewed TRX's above-identified performance report and provides comments in Attachment A. These comments should be addressed in future performance report submittals. TRX should additionally provide an annotated response-to-comments letter as part of the next performance report submittal unless otherwise noted.

Additionally, pursuant to Section VI, paragraph 2 of the 2005 Administrative Order on Consent between TRX (formerly Kerr McGee Chemical LLC) and NDEP, the NDEP, at its discretion, may reduce the quarterly performance reporting to semi-annual reporting. Therefore, TRX may begin to report to the NDEP-BCA on a semi-annual schedule. Commencing immediately, TRX is only required to submit a Semi-Annual (July – December) and Annual (January – June) Performance Report. The Semi-Annual and Annual reports should be submitted by February 28th and August 28th of each year, respectively.

TRX should note that this does not change any permit reporting requirements, etc. Additionally, TRX should continue to provide timely notification to NDEP about significant remedial system upsets or shutdowns, well destruction, etc.

It is suggested that the issues in Attachment A be discussed, in person, with the NDEP at the next available date. Please contact the NDEP to arrange this meeting. Please contact the undersigned with any questions at sharbour@ndep.nv.gov or (702) 486-2850 extension 240.

Sincerely,

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

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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
Ebrahim Juma, Clark County Comprehensive Planning, PO Box 551741, Las Vegas, NV, 89155-1741
Ranajit Sahu, BRC, 311 North Story Place, Alhambra, CA 91801
Rick Kellogg, BRC, 875 West Warm Springs, Henderson, NV 89011
Mark Paris, Landwell, 875 West Warm Springs, Henderson, NV 89011
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, page 2-2, second paragraph, please notify the NDEP when the new injection trench has been installed. TRX should additionally report the installation in the corresponding performance report.
2. Section 2.0, page 2-2, fourth paragraph, TRX should remove this discussion until TRX has evidence to present that their assumptions are correct. It is suggested that this discussion (and similar discussions throughout the report) be deferred to the Capture Zone Evaluation.
3. Section 3.0, page 3-2, the NDEP has the following comments:
   a. TRX states that the anomalously high concentration of chromium in well ART-1 is believed to be due to "chromium leaching from the stainless steel screen". Please explain the chemical conditions in this well that would facilitate this leaching. Also, well ART-1 is not a new well so please explain what has changed in the recent past to facilitate this leaching.
   b. Last paragraph, TRX states that PC-68 will be abandoned because "it is no longer needed." Please provide rationale for this statement.
4. Section 5.0, page 5-1, TRX notes that approximately 77% of pond AP-5 has been treated. NDEP would like to discuss TRX's plans for the use of the excess treatment capacity once pond AP-5 is remediated.
5. Figure 11, it is requested that the scale on this Figure be adjusted so that more recent data can be presented in a meaningful fashion. NDEP is amenable to addressing this in any number of ways and would like to discuss this matter with TRX. This comment also applies to other Figures.
6. Appendix C, Response To Comments (RTC), the NDEP has the following comments:
   a. RTC 1.a, as noted above, TRX should notify NDEP when the Interceptor well field rehabilitation is complete and include in the next performance report.
   b. RTC 1.c, as noted above, TRX should remove this discussion until TRX has evidence to present that their assumptions are correct.
   c. RTC 5.d, the NDEP has the following comments:
      i. TRX states that influent and effluent samples are collected annually from the activated carbon system. Please provide the annual sampling analytical results for the activated carbon influent and effluent sampling in the next performance report.
      ii. Please note that based upon a review of groundwater data from neighboring properties to the west it appears that a plume of high concentration organics is approaching the western edge of the TRX on-Site treatment system. For example, chloroform at concentrations in excess of 6,000 micrograms/liter.
      iii. It should be noted that the groundwater treatment system operated north of the Olin property is not effective in treating beta-BHC. This system uses two stages of granular activated carbon as well as air stripping. TRX should consider this when examining options to address beta-BHC.
   d. RTC 5.e, the NDEP discussed having TRX report a minimum of the last 5 quarters of data in the hard copy of the report. The electronic version of the database included with the performance report was to contain all historical and current data. Please include all historical data in the electronic version of the database included with the next performance report.