

July 21, 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:

Phase B Source Area Investigation Work Plan, Area I (Northern LOUs), Tronox LLC Facility, Henderson, Nevada
Dated April 3, 2008

Phase B Source Area Investigation Work Plan Area IV (Western and Southern LOUs). Tronox LLC Facility, Henderson, Nevada
Dated May 16, 2008

Phase B Source Area Investigation Work Plan Area II (Central LOUs). Tronox LLC Facility, Henderson, Nevada
Dated June 27, 2008

Phase B Source Area Investigation Work Plan Area III (Eastern LOUs). Tronox LLC Facility, Henderson, Nevada

Dated June 27, 2008

Dear Ms. Crowley,

The NDEP has completed review of four of four Phase B Source Area Sampling Analysis Plans (SAPs). The following are general comments regarding the soil sampling analyses.

- NDEP has added PCBs and TPH DRO/ORO analysis to any borings located in the vicinity of Western Area Power Administration (WAPA) property. For the Phase B SAPs these borings include: SA177, RSAR8, SA34, RSAS8, SA208, RSAS5, SA31, RSAS3, RSAS4, RSAS5, RSAS6, RSAS7, RSAT6, RSAT7, and RSAT8. Please note that PCBs will be sampled at other locations as indicated in the SAPs and the subsequent NDEP response letters to each of the SAPs.
- NDEP has added organophosphorus pesticides (OPP) and organic acid analyses to all borings associated with the sections of LOU 5, LOU 59, and LOU 60 downstream of the western property boundary. For the Phase B SAPs these borings include: SASA131, SA66, SA67,

SA128, SA70, SA104, SA129, SA175, SA86, SA92, SA155, SA71, SA165, SA49, SA154, SA107, RSAN7, SA158, RSAN4, SA55, SA182, SA183, SA176, SA50, SA198, SA64, SA189, RSAL4, SA82, SA134, RSAJ3, SA 192SA126, RSAQ6, RSAP7, SA178, all additional borings for LOU 60 in Area III, all additional borings on LOU 60 for Area VI .

- NDEP has added cyanide to the all of the borings north of Row V and west of Column 6 (not inclusive) of Plate A. Please note that other locations will be sampled for cyanide as indicated in the SAPs and the subsequent NDEP response letters.

TRX should additionally submit four copies of a revised Plate A that addresses the NDEP's comments from the Area I, II, III, and IV response letters. These revised plates will be placed in each of the Phase B Source Area SAPs. 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

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
Ebrahim Juma, DAQEM, 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
Teri Copeland, 5737 Kanan Road #182, Agoura Hills CA 91301
Paul Hackenberry, Hackenberry Associates, LLC, 550 W. Plumb Lane B425, Reno, NV 89509
Kelly Black, Neptune and Company, Inc., 8550 West 14th Street, Suite 100, Lakewood, CO 80215