



STATE OF NEVADA  
Department of Conservation & Natural Resources  
DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor  
Allen Biaggi, Director  
Leo M. Drozdoff, P.E., Administrator

November 29, 2010

Matt Paque  
Tronox LLC  
PO BOX 268859  
Oklahoma City, OK 73134

Re: **Tronox LLC (TRX)**  
**NDEP Facility ID #H-000539**  
Nevada Division of Environmental Protection (NDEP) Response to:  
*RZ-D Western Property Line Cut Slope Material, Tronox Facility, Henderson, Nevada*  
Dated: November 17, 2010

Dear Mr. Paque,

The NDEP has received and reviewed TRX's above-identified Deliverable and provides comments in Attachment A. A revised Deliverable should be submitted by **December 8, 2010** based on the comments found in Attachment A. TRX should additionally provide an annotated response-to-comments letter as part of the revised Deliverable.

Please contact the undersigned with any questions at [sharbour@ndep.nv.gov](mailto:sharbour@ndep.nv.gov) or 775-687-9332.

Sincerely,

Shannon Harbour, P.E.  
Staff Engineer III  
Bureau of Corrective Actions  
Special Projects Branch  
NDEP-Carson City Office  
Fax: 775-687-8335

SH:sh

EC: Jim Najima, Bureau of Corrective Actions, NDEP  
Greg Lovato, Bureau of Corrective Actions, NDEP  
William Knight, Bureau of Corrective Actions, NDEP  
Carolyn Tanner, AG's Office, Reno, NV  
Bill Frey, AG's Office, Carson City, NV  
Brenda Pohlmann, City of Henderson  
Stephen Tyahla, U.S. Environmental Protection Agency, Region 9  
Jay A. Steinberg, Tronox Henderson Trust  
Allan Delorme, ENVIRON  
Mark Travers, ENVIRON



Mike Skromyda, Tronox LLC  
Michael J. Foster, Tronox LLC  
Keith Bailey, Environmental Answers LLC  
Susan Crowley, Tronox LLC (Contractor)  
Deni Chambers, Northgate Environmental  
Brian Rakvica, McGinley and Associates  
Joe McGinley, McGinley & Associates  
Barry Conaty, Holland & Hart LLP  
Ranajit Sahu, BRC  
Rick Kellogg, BRC  
Lee Farris, BRC  
Mark Paris, Landwell  
Craig Wilkinson, TIMET  
Kirk Stowers, Broadbent & Associates  
Victoria Tyson, Tyson Contracting  
George Crouse, Syngenta Crop Protection, Inc.  
Nick Pogoncheff, PES Environmental  
Lee Erickson, Stauffer Management Company  
Michael Bellotti, Olin Corporation  
Curt Richards, Olin Corporation  
Paul Sundberg, Montrose Chemical Corporation  
Joe Kelly, Montrose Chemical Corporation of CA  
Jeff Gibson, AMPAC  
Larry Cummings, AMPAC  
Ebrahim Juma , Clean Water Team  
Joe Leedy, Clean Water Team  
Kathryn Hoffmann, Clean Water Team

CC: Susan Crowley, C/O Tronox LLC, PO Box 55, Henderson, NV 89009  
Lee Farris, BRC, 875 W. Warm Springs Road, Henderson, NV 89011  
Lee Erickson, Stauffer Management Company

## Attachment A

1. General comment, NDEP notes that three property boundary samples were collected in area labeled as the cut slope in Figure 1. TRX should provide this data and include discussion on how this data supports or doesn't support the conclusion in the last paragraph on page 2 that "this Material represents the eastern portion of the closed TEP and is not related to the former Tronox Hazardous Waste Landfill." TRX should additionally include statistical comparison data as appropriate.
2. Page 1, 2<sup>nd</sup> paragraph, please clarify which excavation polygon is being referenced by RZ-D-D02 (i.e. RZ-D-02 or RZ-D-01D2).
3. Figure 1, TRX states in the 2<sup>nd</sup> paragraph of page 1 that Figure 1 shows the approximate location of the "Material exposed by the cut slope"; however, NDEP did not see this notated on this Figure. Please revise the Figure accordingly.
4. Figure 3, please annotate this Figure with the different layers described in the text.
5. Figures 4 – 6: please label the Trade Effluent Pond berms, the TRX Hazardous Waste Landfill, BMI waste placement, and any other features that are discussed in the text on these Figures.