



environmental management, inc.

From: Deni Chambers
Derrick Willis
Ted Splitter

Date: August 13, 2010

To: Shannon Harbour, P.E.
Nevada Division of Environmental Protection

RE: Response to August 10, 2010 Nevada Division of Environmental Protection (NDEP) Comments on *Tronox Phase B Remediation Program Schedule, Dated August 4, 2010*.

RESPONSE TO COMMENTS

Northgate Environmental Management, Inc. (Northgate) submits this Response to Comments on the Tronox Phase B Remediation Program Schedule, Dated August 4, 2010 on behalf of Tronox LLC. Tronox has reviewed the August 10, 2010 NDEP comments and has addressed comments accordingly.

1. *Comment:* Please revise the schedule to reflect the Milestones established by NDEP in a separate letter dated August 10, 2010.

Response: Tronox will revise the schedule upon further discussion of Milestone dates. Please see our initial comments regarding Milestone dates below.

1. *Milestone: Notice of excavation contractor selection: **August 12, 2010***

Tronox concurs. Notice of excavation contractor was submitted August 12, 2010.

2. *Milestone: Final RZ-B Excavation Plan submittal: **August 20, 2010***

Tronox concurs. Final RZ-B excavation Plan will be submitted August 20, 2010. Errata pages will be submitted as appropriate based upon receipt of additional pending data.

3. *Milestone: Revised RZ-C Excavation Plan submittal: **September 1, 2010***

RZ-C excavation is not currently a critical path item, and for efficiency reasons (i.e., data pending; numerous iterations), Tronox proposes a date of September 20, 2010 for the final excavation plan. This date should not impact the completion of the overall schedule.

4. *Milestone: Notice of completion of excavation and debris removal in RZ-B: **September 7, 2010***

Tronox will revise the schedule based on the contractor bid. The contractor has agreed to complete both RZ-B and RZ-D by October 30, 2010. It is up to the contractor's discretion to select the method and sequence of remedial work.

5. *Milestone: Revised RZ-E Excavation Plan submittal: **October 12, 2010***

Tronox concurs with the milestone schedule of October 12, 2010 for RZ-E Excavation Plan.

6. *Milestone: Notice of completion of excavation in RZ-D: **October 21, 2010***

The Contractor is scheduled to complete excavation of RZ-B and RZ-D by October 30, 2010. We will make every attempt to complete excavation activity prior to this date. Notice of completion will be issued immediately upon completion of remediation work.

2. *Comment:* Please clarify whether the excavation activities for RZ-C and RZ-E will be completed by the same Contractor selected for RZ-B and RZ-D excavation activities.

Response: RZ-C and RZ-E may be completed by the same contractor contingent on satisfactory completion of remedial work in RZ-B and RZ-D. The current bid is for work to be complete in RZ- B and RZ-D. Additionally, contractor selection for RZ-C and RZ-E will be contingent on successful negotiation of acceptable pricing.

3. *Comment:* NDEP was under the impression that debris removal from the basements of Unit Buildings 1 and 2 would last two months. Please clarify why 10 days is shown on the schedule. Additionally, NDEP has been notified that commencement of this work has been delayed until August 17, 2010. Please revise the schedule as necessary to show the impact of these delays.

Response: Tronox concurs with NDEP; the contractor has notified us in the past couple of days that soil and debris removal from the basements of Unit Buildings 1 and 2 could take up to 2 months. We will revise the schedule accordingly. The commencement of work has been delayed to August 17, 2010 due to permitting delays by DAQEM. We will revise the schedule accordingly; however, we do not anticipate that this will delay the completion of remediation of RZ-B and RZ-D beyond October 30, 2010 (see above).

4. *Comment:* Excavation activities for RZ-B should be independent of and thereby not delayed by the work conducted for Unit Buildings 1 and 2.

Response: Tronox agrees. See comment #3.

5. *Comment:* The current schedule indicates that excavation will be occurring simultaneously in RZ-B and RZ-D. Please clarify what happens after work is completed in RZ-B (i.e. will the additional crew/equipment be moved to RZ-D so that remediation continues on an accelerated schedule.)

Response: The contractor is working on a completion date of October 30, 2010 for RZ-B and RZ-D. The order of work is up to the contractor's discretion.

6. *Comment:* At a minimum, excavation activities for RZ-C should commence immediately after work is completed in RZ-D. Please revise the schedule so that work in RZ-C commences no later than October 21, 2010. Please note that this will also impact the start date for work in RZ-E. Please revise the start date for work in RZ-E to no later than December 2, 2010.



Response: Tronox concurs and intends to initiate work in RZ-C on October 21, 2010. Additionally, Tronox concurs with the December 2, 2010 start date for work in RZ-E.

7. *Comment:* As TRX's request for Environmental Covenants impact the excavation limits proposed for the Site, the current submittal date of October 20, 2010 for the Environmental Covenants document is not acceptable. This document should be submitted to the NDEP **by August 31, 2010** and should at a minimum provide all necessary back-up information for the selection of the proposed boundary.

Response: As requested by NDEP, we will submit site plans to identify the proposed EC areas by August 31, 2010. These plans will provide backup information to explain why excavation is not technically feasible or commercially unreasonable. Final excavation boundaries may be revised based on additional soil sampling results obtained after August 31, 2010.

8. *Comment:* TRX removed the Soil Flushing Task from the Schedule. Please include the schedule for this Task and additionally include a schedule for In-Situ Bioremediation. Please include an update on the status of these Tasks in the response-to-comments.

Response: Tronox will revise the schedule accordingly to include Soil Flushing and In-Situ Bioremediation.

Soil Flushing Status: The testing laboratory is currently constructing the soil columns and expects to begin the percolation and leaching tests within the next week. Tronox is on schedule to submit a report detailing the results of the soil flushing column tests in mid-October.

In-Situ Bioremediation Status: The work plan is in draft review and will be submitted to NDEP next week. We anticipate that bench scale studies will be initiated within the next month.

