



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

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

January 17, 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 Response (Part 1) to:
Technical Memorandum – Data Review for 2007 Tronox Parcels A/B Investigation
Dated December 6, 2007

And

Asbestos Data Review for 2007 Tronox A/B Investigation,
dated December 17, 2007

And

Uranium Isotope Data Review for 2007 Tronox A/B Investigation,
dated December 18, 2007

And

Asbestos Data Review for 2007 Tronox A/B Investigation,
Dated January 9, 2008

And

Supplemental information provided via electronic mail (various dates)

Dear Ms. Crowley,

The NDEP has received and reviewed TRX's above-identified report and finds that No Further Action (NFA) is required at this time with the following conditions:

1. TRX retains the responsibility to address any environmental impacts to groundwater beneath the property referred to as Parcels A and B. As such, additional investigation may be necessary on



this property as it relates to TRX's responsibilities. TRX must be granted access to the site for activities such as well or soil boring installations or other investigative or remedial efforts.

2. The materials presented to the NDEP do not evaluate the possibility of a vapor intrusion concern from contamination in groundwater. It is anticipated that this issue will be addressed as part of the investigation of groundwater issues in the region.
3. The site soils beneath 10' below ground surface have not been evaluated to date. The property owner should note that these soils should not be disturbed without additional investigation or evaluation.
4. To limit liability, the property owner should ensure that activities at the property do not exacerbate existing, sub-surface, environmental conditions.
5. The site use is suitable for purposes of commercial or industrial use only.

It should be noted that technical comments are provided under separate cover and are intended to: provide additional clarity for the basis of this NFA; provide clarity for the administrative record; and to provide guidance for development of future Deliverables.

Please contact the undersigned with any questions at brakvica@ndep.nv.gov or (702) 486-2850 x 247.

Sincerely,



Brian A. Rakvica, P.E.
Supervisor, Special Projects Branch
Bureau of Corrective Actions
NDEP-Las Vegas Office

BAR:sh:jn:wf:bar

CC: Jim Najima, NDEP, BCA, Carson City
Shannon Harbour, NDEP, BCA, Las Vegas
William J. Frey, AG's Office, Carson City
Keith Bailey, Environmental Answers, 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
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., Suite 100, Novato, CA 94947
Lee Erickson, Stauffer Management Company, P.O. Box 18890, Golden, CO 80402
Michael Bellotti, Olin Corporation, PO Box 248 1186 Lower River Road, Charleston TN 37310-0248
Curt Richards, Olin Corporation, PO Box 248 1186 Lower River Road, Charleston TN 37310-0248
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