



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 23, 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:
TRX Letter RE: Remediation Status of RZ-D
Dated: November 15, 2010

Dear Mr. Paque,

The NDEP has received the above-referenced letter and notes that TRX is not on schedule to meet the December 2009 Finding of Alleged Violation and Order requirement to demonstrate source control at the TRX Site by December 31, 2010. TRX has previously proposed extending completion of RZ-D from October 30, 2010 to November 15, 2010. With the above-referenced correspondence, TRX is proposing to extend the completion of remediation zone RZ-D to November 22, 2010. During a November 17, 2010 conference call, TRX further clarified that "the bulk of the excavation" would be completed by the November 22, 2010 milestone. As of today, NDEP has not been contacted by TRX with an update on the completion status of excavation in RZ-D and NDEP is aware that work is still on-going in this area as of today.

Additionally, NDEP is aware that excavation has only commenced this week in RZ-C. This work was reported to commence on November 8, 2010 according to the November 5, 2010 Remediation Schedule Update and currently requires 40 business days for completion. If the same duration is expected, then TRX will not complete source removal excavation by the December 31, 2010 deadline.

Please provide clarification by **November 30, 2010** regarding how TRX plans meet the December 31, 2010 deadline for the demonstration of source control. Please contact the undersigned with any questions at 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:gl: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
Mitch Kaplan, U.S. Environmental Protection Agency, Region 9
Jay A. Steinberg, Tronox Henderson Trust
Allan Delorme, 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
Ranjit 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
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CC: Susan Crowley, C/O Tronox LLC, PO Box 55, Henderson, NV 89009
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