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April 2, 2007

Mr. Brian Rakvica, P.E.  
Nevada Division of Environmental Protection  
1771 East Flamingo Road, Suite 121-A  
Las Vegas, Nevada 89119

**Subject: *Community Involvement Plan - Tronox LLC, Henderson, Nevada, Response to NDEP March 19<sup>th</sup> Comments***

Dear Mr. Rakvica:

Tronox LLC (Tronox) has undertaken an Environmental Conditions Assessment (ECA) as directed by the Nevada Division of Environmental Protection (NDEP). A Community Involvement Plan (CIP), dated March 14, 2007, was developed regarding the assessment work, which described mechanisms for public involvement in the process. NDEP provided comments to the March 14<sup>th</sup> CIP in a March 19<sup>th</sup> correspondence. In response to NDEP's comments, the CIP has been revised and is attached.

Please contact me at (702) 651-2234 if you have any comments or questions concerning this correspondence.

Sincerely,

Susan M. Crowley  
Staff Environmental Specialist

Overnight Mail

Attachment

CC: See attached Distribution List

Tronox LLC

8000 West Lake Mead Parkway, Henderson, Nevada 89015 • P.O. Box 55, Henderson, Nevada 89009

# Tronox Document Distribution List

Updated: 2-Apr-07

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Rakvica Brian	NDEP	2	2	Hatmaker John	Tronox		X
Sous Nadir	NDEP			Reed Tom	Tronox	X	X
Tinney Al	NDEP		X	Hurst Elizabeth	Tronox Counsel		X
Palm Jon	NDEP		X	Stater Rick	Tronox		X
Harbour Shannon	NDEP		X	Crowley Susan	Tronox	2 & Hard Data	2
Pohlmann Brenda	COH		X	Krish Ed	ENSR	X	X
Conaty Barry	COH Counsel		X	Bilodeau Sally	ENSR	X	X
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Beckstead Richard	DAQEM			Cheung Mary	Veolia		
Jorgenson Carolyn	DAQEM Counsel			Guerrero Joe	AIG		X
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Liesing Joe	SNWA			Crouse George	Syngenta		X
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Fig 1

Prepared for:  
**Tronox LLC**  
**Henderson, Nevada**

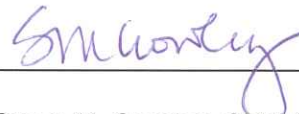
# Community Involvement Plan for Tronox LLC, Henderson, Nevada

ENSR Corporation  
March 2007  
**Document No.: 04020-023-175**

**Community Involvement Plan  
Tronox LLC  
Henderson, Nevada**

**Responsible CEM for this project**

*I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and, to the best of my knowledge, comply with all applicable federal, state and local statutes, regulations and ordinances.*



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Susan M. Crowley, CEM 1428, Exp.: 3/8/09  
Staff Environmental Specialist  
Tronox LLC

**Individuals who provided input to this document**

David L. Gerry, ENSR  
Carmen C. Schnell, ENSR

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## 1.0 Introduction

This Community Involvement Plan (CIP) relates to assessment and remediation activities at the Tronox LLC (Tronox) site undertaken as part of the ongoing Environmental Conditions Assessment. The plan has been prepared in response to discussions held during the All Companies Meeting on December 7, 2006 and the letter issued by the Nevada Division of Environmental Protection (NDEP), dated December 7, 2006 requesting revised CIPs from Tronox LLC, Montrose Chemical Corporation of California, Inc., Pioneer Companies, Inc., Syngenta Corp Protection, inc., and Titanium Metals Corporation (Companies).

Tronox developed this CIP to facilitate two-way communication regarding environmental assessment and remediation activities at the Tronox facility, with the communities and interested parties surrounding the facility in Henderson, Nevada. The CIP encourages community involvement in decisions related to site clean-up activities.

This CIP addresses requirements discussed during the All Companies meeting on December 7, 2006.

### 1.1 Summary and Description

The Tronox (formerly Kerr-McGee Chemical LLC) facility in Henderson, Nevada is located within the Black Mountain Industrial (BMI) complex. The facility is approximately 450 acres in size and is located 13 miles southeast of Las Vegas in an unincorporated section of Clark County, Nevada. It is completely surrounded by the incorporated area comprising the City of Henderson (COH) (Figure 1 – Site Location Map).

The BMI complex has been the site of industrial operations since 1942 and was originally sited and operated by the U.S. government as a magnesium production plant in support of the World War II effort. Following the war, a portion of the complex was leased by Western Electrochemical Company (WECCO). By August 1952, WECCO had purchased several portions of the complex, including six of the large unit buildings, and produced manganese dioxide, sodium chlorate and various perchlorates. In addition, in the early 1950s, pursuant to a contract with the U.S. Navy, WECCO constructed and operated a plant to produce ammonium perchlorate on land purchased by the Navy. In 1956, WECCO merged with American Potash and Chemical Company (AP&CC) and continued to operate the processes, with the Navy's continued involvement in the ammonium perchlorate process. In 1962, AP&CC purchased the ammonium perchlorate plant from the Navy, but continued to supply the Navy, and its contractors, material from the operating process. AP&CC merged with Kerr-McGee Corporation (Kerr-McGee) in 1967. This merger included boron production processes in California, which were moved to Henderson and began operation in the early 1970s. These included elemental boron, boron trichloride and boron tribromide. In 1994, the boron tribromide process was shut down and dismantled. In 1997, the sodium chlorate process was shut down and in 1998, production of commercial ammonium perchlorate ended as well. The ammonium perchlorate production equipment was used to reclaim perchlorate from on-site materials until early 2002, when the equipment was permanently shut down. In 2005, Kerr-McGee Chemical LLC's name was changed to Tronox LLC. Processes currently operated by Tronox at the Henderson facility are for production of manganese dioxide, boron trichloride and elemental boron.

### 1.2 Purpose of this Plan

This CIP will serve as the framework to ensure that information is available to the public during site environmental investigation and remediation activities. It describes planned public involvement activities for the site, and it assigns responsibilities for implementing the communications strategy. The CIP

identifies community relations tools that will encourage meaningful communication between Tronox and the public-at-large.

### 1.3 Agencies with Oversight Responsibilities

The NDEP has primary authority and responsibility for regulatory oversight at the Tronox facility. Other government agencies including the US Environmental Protection Agency (Region IX) and the Southern Nevada Water Authority (SNWA) also follow progress on remedial activities. The site is under several Administrative and Consent Orders to remediate chromium and perchlorate impacts; however, this CIP is being prepared in response to the December 7, 2006 NDEP letter requesting each of the BMI plant sites to prepare a site-specific CIP related to Environmental Conditions Assessment activities.

### 1.4 Contact Information

The points-of-contact responsible for the public participation process during the site investigation and remediation activities at the site are:

#### NDEP Point-of-Contact

Brian Rakvica  
Supervisor Special Projects  
Nevada Division of Environmental Protection  
Bureau of Corrective Actions  
1771 E. Flamingo Road, Suite 121-A  
Las Vegas, NV 89119  
Phone: (702) 486-2850 x 247  
Fax: (702) 486-2863  
E-mail: [brakvica@ndep.nv.gov](mailto:brakvica@ndep.nv.gov)

#### **Note:**

**On April 16, 2007 the NDEP address will change to:  
Division of Environmental Protection  
Bureau of Corrective Actions  
2030 E. Flamingo Rd Ste 230  
Las Vegas, Nevada 89119-0818**

#### Tronox Point-of-Contact

Susan Crowley, CEM 1428 Exp. 3-8-09  
Environmental Specialist  
Tronox LLC  
P.O. Box 55  
Henderson, Nevada 89009  
Phone: (702) 651-2234  
Fax: (702) 651-2310  
E-mail: [susan.crowley@tronox.com](mailto:susan.crowley@tronox.com)

#### Alternate Tronox Point-of-Contact

Rick Stater  
Plant Manager  
Tronox LLC  
P.O. Box 55  
Henderson, Nevada 89009  
Phone: (702) 651-2233  
Fax (702) 651-2310  
E -mail: [rick.stater@tronox.com](mailto:rick.stater@tronox.com)

### 1.5 Community Input into Plan

This CIP describes mechanisms for input from the NDEP, public, and local municipal leaders. This plan will be updated, as needed, to reflect evolving community involvement requirements.

### 1.6 Organization of the Community Involvement Plan

This plan consists of the following sections:

- Section 1.0, Introduction - Provides an introduction and summary of the CIP.
- Section 2.0, Objectives - Describes the specific objectives of the CIP.
- Section 3.0, Public Involvement Activities - Describes the activities designed to promote public involvement throughout the site investigation and remediation activities.



## 2.0 Objectives

This section lists the following specific objectives of the CIP.

- Maintain open communication between Tronox, the communities located near site, and other interested individuals and groups regarding Environmental Conditions Assessment work.
- Establish a CIP with the flexibility to continually identify community concerns and to respond appropriately. As needed, the plan will be updated to ensure effective communication with the community.
- Encourage meaningful community involvement and two-way dialogue by providing regulatory agencies, community leaders, elected officials, and local landowners, with accurate, timely information about site investigation and remedial activities, as well as other important technical and administrative matters.
- Inform the public of the conditions at the site and ongoing activities. This will be accomplished by maintaining a website, distributing fact sheets, participating in public meetings, and maintaining the information repositories.
- Encourage dialogue with, and input from, the public by promoting easily accessible points-of-contact for questions and comments.
- Monitor community concerns to ensure that communications meet the needs of the public.

## 3.0 Community Relations Activities

### 3.1 Website

NDEP has established a web site at <http://ndep.nv.gov/bmi/index.htm> to provide current information about Remediation and Site Investigation activities at the BMI Complex. The web page currently contains a brief summary of the site history, aerial photographs (1943 to 1979), links to BMI entities, fact sheets, and recent press releases. A fact sheet specific to the Tronox site is included on the web site. The website will be expanded significantly over time as more information becomes available.

### 3.2 Fact Sheets

To answer specific questions and to support the sharing of information, site-specific fact sheets have been prepared to inform and update the public about site investigation and remediation activities. The Tronox Facility Fact Sheet explains technical information to the general public in easy-to-read terminology to facilitate understanding by non-technical readers. The Tronox fact sheet is posted on the NDEP website (see Section 3.1) and will be updated as needed.

### 3.3 Public Notification

Public notifications will be conducted, as needed, to inform the community and stakeholders about the status of the ongoing environmental investigations and remediation activities at the Tronox facility. When necessary, information regarding on-going and future site activities will be published in either the Henderson Home News which has general circulation in the City of Henderson or in the Las Vegas Review Journal, whichever is most appropriate for the information being distributed. Distribution of mailings to stakeholders will

also be conducted as necessary. These public notifications will also be available at various locations throughout the community as well as at the public meetings.

### 3.4 Public Meetings

In cooperation with NDEP and the other BMI companies, public meetings will be held to make available current information about site environmental investigation and remediation activities, answer questions, and respond to specific community concerns, issues, or events. NDEP has suggested a "poster session" format to provide public access to the broad range of activities being conducted on the various sites in the BMI complex. Public meetings will be held on an as needed basis, as activities necessitate further public involvement. Public meetings will be announced through published notices in local newspapers.

The designated Tronox point-of-contact will be responsible for obtaining answers to questions and following through on commitments made to the community during the meetings. At the meetings, Tronox along with the other BMI companies, and the NDEP will provide representatives to present information and answer questions. A sign-up list will be included to identify attendees (and particularly attendees who want further information). The proposed meeting location will be in the City of Henderson at a location to be determined later.

### 3.5 Information Repositories

Information repositories have been established to provide public access to hard copies, and electronic copies of the technical reports and other information about the site investigation and remediation. Currently, reviewable documents are available at the Henderson Library; however, Tronox will cooperate with BRC in the establishment of an improved information repository to be located in a planned shopping center on Lake Mead Parkway. Tronox will continue to use the existing repository at the Henderson Library (see address below) until the new repository is completed (expected in about one year). The proposed information repository will contain both historical and future Tronox documents. In addition it will provide electronic document storage on computers, which will improve cataloging and prevent unauthorized document removal.

James I. Gibson Public Library,  
280 S. Water Street, Henderson, Nevada, 89015.  
Phone: 702-565-8402  
Fax: 702-565-8832

Members of the public may contact the library or they may visit the Repository (once completed) during posted operating hours. Copy machines are available at the library for use by the general public.

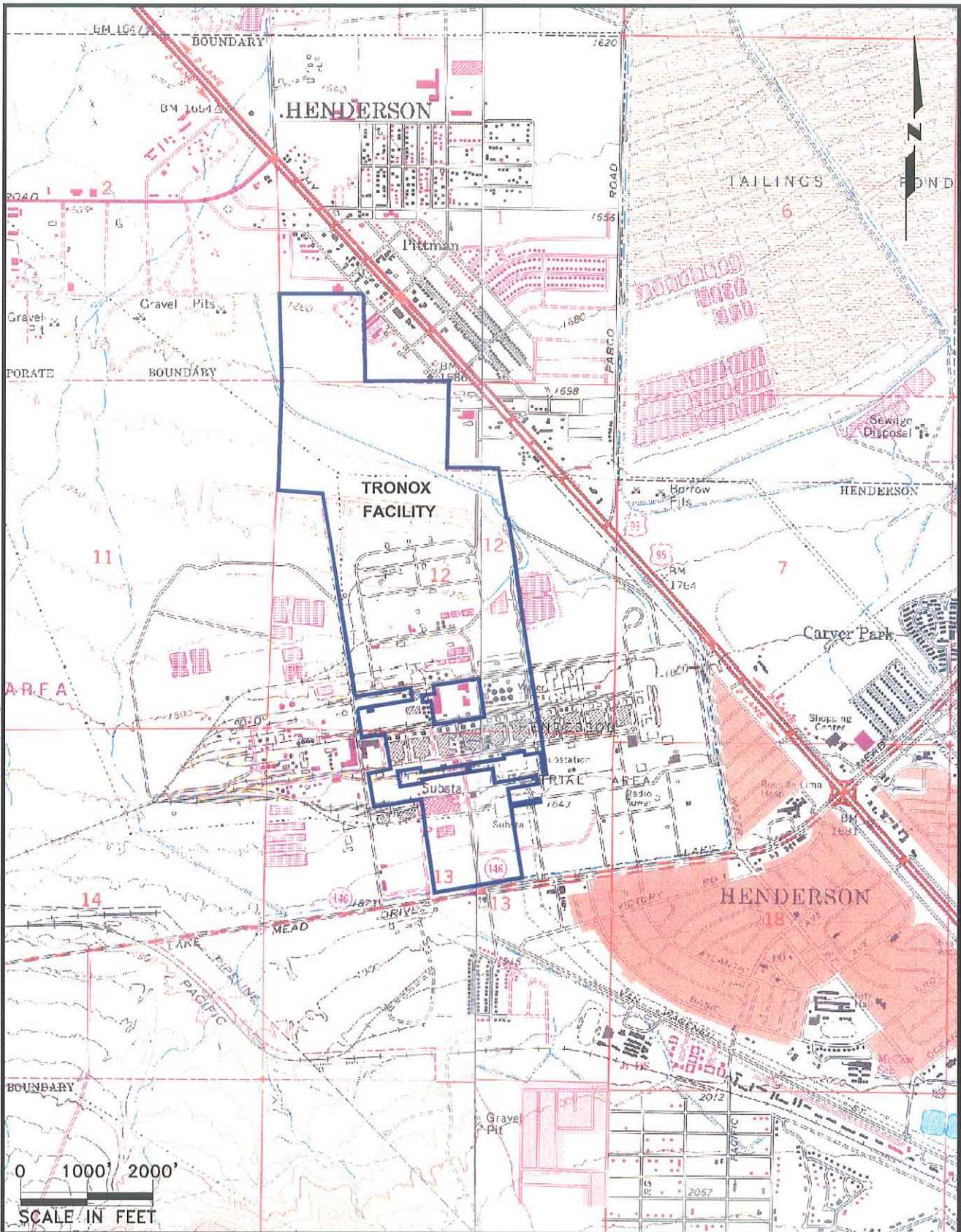
File reviews can also be conducted at the NDEP Las Vegas and Carson City offices during normal business hours. An appointment is required to schedule access to these files.

**NDEP Offices - Las Vegas, NV**  
1771 E. Flamingo Road, Suite 121-A  
Las Vegas, NV 89119  
Phone: (702) 486-2850  
Fax: (702) 486-2863

**NDEP Offices - Carson City, NV**  
901 South Stewart Street, Suite 4001  
Carson City, NV 89701  
Phone: (775) 684-2700  
Fax: (775) 684-2715

**Note: On April 16, 2007 the NDEP  
address will change to:  
2030 E. Flamingo Rd Ste 230  
Las Vegas, Nevada 89119-0818**

FILENAME: J:\2006 Projects\04020\023-Henderson\151 Upgrad Invest Results\Figures\site location map.dwg



SOURCE: USGS 7.5 Minute Topographic Quadrangle, Las Vegas SE, Nevada, 1967, Photorevised 1984 Henderson, Nevada, 1970, Photorevised 1983



QUADRANGLE LOCATION



**SITE LOCATION MAP**

Community Involvement Plan  
Tronox Facility  
Henderson, Nevada

FIGURE NUMBER:

**1**

DRAWN BY: M. Scop	DATE: 1/30/2007	PROJECT NUMBER: 04020-023-175	SHEET NUMBER:
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