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January 14, 2008

Mr. Brian Rakvica, P.E. Nevada Division of Environmental Protection 2030 East Flamingo, Suite 230 Las Vegas, NV 89119-0818

Subject:

NDEP Facility ID H-000539 - Response to NDEP December 7, 2007 Letter Regarding Radionuclide

Analysis for Uranium

Dear Mr. Rakvica:

Tronox LLC (Tronox) has undertaken an Environmental Conditions Assessment (ECA) as directed by Nevada Division of Environmental Protection (NDEP). Radionuclides are included in the Site Related Chemicals for the site and hence have been analyzed in upgradient / background samples as well as samples collected on-site. As noted in your letter of December 7, 2007 different preparatory methods have been used for isotopic uranium analyses for differing datasets within the complex, presenting a comparability problem from dataset to dataset. Tronox is currently confirming the extraction methods used for the upgradient /background dataset and the Phase A field work dataset, as well evaluating how these extractions have effected the isotopic analyses. This confirmation has not been received from STL.

The two methods indicated in your December 7, 2007 letter, 3a and 3b, are both acceptable to Tronox. Further, it may be necessary to complete both exercises to compare results and ensure past data is usable. Because multiple datasets are effected, our preference is that NDEP complete the exercise in 3a. Tronox will complete the 3b exercise for the Tronox upgradient / background dataset compared to the Tronox Phase A dataset.

Feel free to call either Keith Bailey (405) 216-9213 or me at (702) 651-2234 if you have any questions regarding this correspondence. Thank you.

Sincerely,

Swan Crowley

Staff Environmental Specialist, CEM 1428 exp 3-8-09

Cc:

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smc/Trx to NDEP - 1-14-08 re Rad Extraction Evaluation.doc