



Air Quality & Environmental Management

500 S. Grand Central Parkway, 1st floor
Las Vegas NV · 89155-1776
(702) 455-5942 · Fax (702) 383-9994



CLARK COUNTY · LAS VEGAS · NORTH LAS VEGAS · BOULDER CITY · HENDERSON · MESQUITE

DUST CONTROL PERMIT FOR CONSTRUCTION ACTIVITIES INCLUDING SURFACE GRADING AND TRENCHING

THIS PERMIT DOES NOT EXEMPT THE PERMITTEE FROM COMPLIANCE WITH THE ENDANGERED SPECIES ACT

Permit Number: **38851** Mod: **0** PAYMENT INFORMATION: 20102462
Fee: **\$966.00**

Permittee and Project Information

Balance Due: \$ 0

Permittee:	Las Vegas Paving Corporation		
Permittee Address:	4420 South Decatur Blvd		
City, State, Zip:	Las Vegas NV 89103	Fax No.:	7022579436
Project Name:	Asbestos Abatement		
Project Address:	560 West Lake Mead Pkwy		
Located In:	Township: 22	Range: 62	Section: 13 EO Area: SE
Acreage This Mod:	6.6	Total Acreage:	6.6
Cross Streets:	E of US-95		

J-11533
~~2628~~
T-~~2710~~

Project Contact(s)

Normal Hours:	Troy Hildreth	After Hours:	Troy Hildreth 2102
Company:	Las Vegas Paving Corporation	Company:	Las Vegas Paving Corp
Phone:	(702)510-1278	Phone:	(702)510-1278

Issue Date:	10-Aug-2010	Expiration Date:	10-Aug-2011
Effective Date:	<u>K. Blanton 8-12-10</u>		
Notes	<input type="radio"/> Request Of Sign Waiver <input type="radio"/> Public Works Agreement <input type="radio"/> Closure Plan <input type="radio"/> Conditional Renewal		
RENOVATION	DANS J-11418 T-2628		

DUST CONTROL MEASURES MUST OCCUR 24 HOURS A DAY, 7 DAYS A WEEK

THIS PERMIT IS NOT VALID UNTIL ALL FEES ARE PAID IN FULL AND A COMPLETE COPY IS ON THE PROJECT SITE, INCLUDING CONDITIONS OF PERMIT AND DUST MITIGATION PLAN

It is a condition of the issuance of any operating permit required by the commission or pursuant to any local ordinance for the control of air pollution that the holder of the operating permit agrees to permit inspection of the premises to which the permit relates by any authorized officer of the department at any time during the holder's hours of operation without prior notice. This condition must be stated on each application form and operating permit. NRS 445B.580.

The issuance of this PERMIT does not relieve the PERMITTEE from compliance with all other applicable federal, state, county and local ordinances and regulations. Issuance of this PERMIT shall not be a defense to violations of any applicable ordinances or regulations.

4. Point of Contact for dust control matters and to whom a NOTICE OF VIOLATION should be sent if necessary:

Name: Troy Hildreth Company: Las Vegas Paing Corp.
Address: 4420 S. Decatur
City: Las Vegas State: NV Zip: 89103
Telephone: 251-5800 Ext: Fax: 257-9436
Cellular/Pager: 510-1278 After Hours Phone: 510-1278

5. On-site Superintendent/Supervisor/Foreman contact:

Name: Troy Hildreth Company: Las Vegas Paving Corp.
On-site phone: 510-1278 Cellular/Pager: 510-1278
DAQEM Dust Class Certification/Card #: dm0205007 Expiration date: 3/27/11

Have all other on-site supervisory personnel attended the DAQEM Dust Class? [X] Yes [] No
If no, all on-site supervisory personnel must attend a DAQEM Dust Class within 30 days.

6. Storm Water Advisory: Be advised that all land disturbances that exceed one (1) acre or which are adjacent to a waterway must submit a "Notice of Intent" to the Nevada Division of Environmental Protection (NDEP) that certifies a Storm Water Pollution Prevention Plan has been developed and is maintained for the site. For information contact NDEP at (775) 687-9429. Applications and instructions are available at www.ndep.nv.gov/bwpc/storm01.htm

7. By signing this permit application I certify that:

- A. I am authorized, on behalf of the individual or company listed in Section 1, as Applicant/Permittee, to apply for their Dust Control Permit and to commit to all of the terms and conditions of the requested permit.
B. Construction activities will be limited to lands that the applicant/permittee either owns or is authorized to use for construction activities. The permit issued subsequent to this application is not a substitute for obtaining the property owners permission to use his land. Issuance of a Dust Control Permit is intended only for the purpose of controlling emissions of air pollutants and assuring compliance with Air Quality Regulations. The applicant/permittee agrees to hold harmless, indemnify, and defend Clark County, its employees and assigns from any claims that may arise due to any unauthorized use of land for construction activities.
C. The permittee accepts responsibility for assuring that all contractors, subcontractors, and all other persons on the construction site covered by this permit, comply with the terms and conditions of the permit, the dust mitigation plan and all applicable Air Quality Regulations.
D. The applicant/permittee understands that it is a condition of the permit that the permittee agrees to allow the inspection of the site for compliance with the terms and conditions of the permit and Air Quality Regulations at any time during the permittee's hours of operation by a DAQEM officer without prior notice or at any time pursuant to the investigation of a complaint or upon direct observation of emission and/or failure to maintain Best Management Practices.
E. I understand that any material misrepresentation made in this application may invalidate the permit and that Clark County may pursue enforcement action against me. In addition, I understand any willful misrepresentation may result in criminal penalties. I declare under penalty of perjury that the foregoing is true and correct.

Executed on:

August 4, 2010
DATE

Troy Hildreth
PRINTED NAME

[Handwritten Signature]
SIGNATURE
Las Vegas Paving Corp.
TITLE AND COMPANY NAME

Application completed by, if not completed by signatory (Please Print):

Name _____ Phone Number _____ Ext. _____

PAYMENT INFORMATION TO BE COMPLETED BY THE APPLICANT	
PAYING BY (Please Print)	
<input type="checkbox"/> CASH	
<input checked="" type="checkbox"/> CHECK	CHECK # <u>00262461</u>
	NAME AND ADDRESS AS IT APPEARS ON CHECK:
	Las Vegas Paving Corp.
	4420 S. Decatur
	Las Vegas, NV 89103
	Telephone #: 251-5800
<input type="checkbox"/> CREDIT CARD	LAST FOUR DIGITS OF CREDIT CARD NUMBER: _____
	EXACT NAME AS IT APPEARS ON CREDIT CARD: _____

FOR DAQEM USE ONLY		
<u>8.10.10</u>	<u>205 38851</u>	<u>20102453 62</u>
ISSUE DATE	ISSUED BY	POS #
<u>8/5/10</u>	<u>S. Watson</u>	
DATE PAID	RECEIVED BY	
DAQEM REVIEW: <u>[Signature]</u>	DATE: <u>8.9.10</u>	
BLASTING APPROVAL (if applicable): _____	DATE: _____	
DEMOLITION APPROVAL (if applicable): _____	DATE: _____	
COMPLIANCE AREA ASSIGNMENT: <u>SE</u>	Hydrographic Area: <u>212</u>	
<input type="checkbox"/> Airport <input type="checkbox"/> Blasting <input type="checkbox"/> Commercial <input type="checkbox"/> Demo-Structure <input type="checkbox"/> Demo-Other <input type="checkbox"/> Staging/Stockpiling <input type="checkbox"/> Highway <input type="checkbox"/> Schools <input type="checkbox"/> Residential <input type="checkbox"/> Public Works <input type="checkbox"/> Flood Detention <input type="checkbox"/> Utilities <input checked="" type="checkbox"/> Misc.		

CONTROL MEASURES SELECTION PAGES

Asbestos Aatement

BACKFILLING

BMP 01

**YOU MUST SELECT AT LEAST ONE CONTROL MEASURE FOR EACH REQUIREMENT.
PLACE A CHECK IN THE BOX IN FRONT OF YOUR SELECTION.**

Requirement: Stabilize backfill material when not actively handling.

- 01-1 Water backfill material to maintain moisture or to form crust when not actively handling.
- 01-2 Apply and maintain a dust palliative to backfill material to form crust when not actively handling.
- 01-3 Cover or enclose backfill material when not actively handling.

Requirement: Stabilize backfill material during handling.

- 01-4 Empty loader bucket slowly and minimize drop height from loader bucket.
- 01-5 Dedicate water truck or large hose to backfilling equipment and apply water as needed.

Note: Select at least one of the above; in addition the appropriate control measure for your soil type must be selected from the following.

- 01-6 **L:** Mix moist soil with dry soil until the optimum moisture is reached.
- 01-7 **ML:** Apply and mix water into the backfill material until optimum moisture is reached.
- 01-8 **MH:** Apply and mix water and tackifier solution into the backfill material until optimum moisture is reached.
- 01-9 **H:** Apply and mix water and surfactant solution into the backfill material until optimum moisture is reached.

Requirement: Stabilize soil at completion of backfilling activity.

- 01-10 Apply water and maintain disturbed soils in a stable condition until permanent stabilization is complete.
- 01-11 Apply and maintain a dust palliative on disturbed soils to form a crust following backfilling activity.

Requirement: Stabilize material while using pipe padder equipment.

- 01-12 Mix moist soil with dry soil until the optimum moisture is reached.
- 01-13 Dedicate water truck or large hose to equipment and apply water as needed.

CONTROL MEASURES SELECTION PAGES

Asbestos Aatement

DISTURBED SOIL

BMP 10

**YOU MUST SELECT AT LEAST ONE CONTROL MEASURE FOR EACH REQUIREMENT.
PLACE A CHECK IN THE BOX IN FRONT OF YOUR SELECTION.**

Requirement: For each non-linear project to be permitted for 5 acres or less; install perimeter wind barrier 3 feet or more in height made of material with a porosity of 50% or less.

Requirement: Limit vehicle traffic and disturbance of soils where possible.

- 10-1 Limit vehicle traffic and disturbance of soils with the use of fencing, barriers, barricades, and/or wind barriers.

Requirement: Stabilize and maintain stability of all disturbed soil throughout construction site.

Note: You must choose one or more of the following.

- 10-2 Apply water to stabilize disturbed soils. Soils must be kept in a sufficiently damp, crusted or covered condition.
- 10-3 Apply and maintain a dust palliative based on soil type and future plans.

Requirement: Soil conditions, including preventive and corrective measures, must be recorded every day the construction project is active.

- 10-4 Record soil conditions and dust control actions in daily project records.

Recommendations: If interior block walls are planned, install as early in the construction as possible.

See also: BMP 11: DISTURBED LAND – Long-Term Stabilization, if no continuing activity will occur within 30 days.

CONTROL MEASURES SELECTION PAGES

Asbestos Aatement

DISTURBED LAND – Long-Term Stabilization

BMP 11

**YOU MUST SELECT AT LEAST ONE CONTROL MEASURE FOR EACH REQUIREMENT.
PLACE A CHECK IN THE BOX IN FRONT OF YOUR SELECTION.**

**Requirement: Stabilize soil to meet standards required by Air Quality
Regulation Section 90.**

- 11-1 Apply and maintain a dust palliative on disturbed soils for long-term stabilization.
- 11-2 Stabilize disturbed soil with vegetation for long-term stabilization.
- 11-3 Pave or apply surface rock for long-term stabilization.
- 11-4 Use wind breaks in accordance with a site-specific plan approved by the Control Officer and Region IX Administrator of the EPA.
- 11-5 Apply water and maintain soils in a visible damp or crusted condition for temporary stabilization.

Requirement: Prevent access to limit soil disturbance.

- 11-6 Prevent access by fencing, ditches, vegetation, berms or other suitable barrier or means approved by the Control Officer.

Recommendations: Plant perimeter vegetation early. Use of native and drought-tolerant plants with greater than 50 % silhouette area is encouraged.

See also: BMP 12: DUST SUPPRESSANT, DUST PALLIATIVE AND SURFACTANT – Selection and Use.

CONTROL MEASURES SELECTION PAGES

Asbestos Aatement

IMPORTING/EXPORTING SOIL, ROCK AND OTHER BULK MATERIAL

BMP 13

**YOU MUST SELECT AT LEAST ONE CONTROL MEASURE FOR EACH REQUIREMENT.
PLACE A CHECK IN THE BOX IN FRONT OF YOUR SELECTION.**

Requirement: Limit visible dust opacity from vehicular operations.

- 13-1 Apply water and limit vehicle speeds to 15 mph on the work site.
- 13-2 Apply and maintain dust suppressant on haul routes.

Requirement: Check belly-dump truck seals regularly and remove any trapped rocks to prevent spillage.

Requirement: Maintain 3-6 inches of freeboard to minimize spillage.

Requirement: Stabilize materials during transport on site.

- 13-3 Use tarps or other suitable enclosures on haul trucks.
- 13-4 Stabilize materials with water.

Requirement: Clean wheels and undercarriage of haul trucks prior to leaving construction site.

Recommendations: Verify State and local laws, concerning the hauling of bulk materials on public roadways.

See also: BMP 20: TRACKOUT PREVENTION AND CLEANUP.

BMP 23: TRUCK LOADING.

CONTROL MEASURES SELECTION PAGES

Asbestos Aatement

STOCKPILING

BMP 19

**YOU MUST SELECT AT LEAST ONE CONTROL MEASURE FOR EACH REQUIREMENT.
PLACE A CHECK IN THE BOX IN FRONT OF YOUR SELECTION.**

Requirement: To the extent possible, maintain stockpile to avoid steep sides or faces.

Requirement: Stockpile location and height must be maintained pursuant to Air Quality Regulations. Stockpiles located within 100 yards of occupied buildings must not be constructed over 8 feet in height.

- 19-1 Stockpiles will not be constructed over 8 feet in height.
- 19-2 Stockpiles will be constructed over 8 feet high and must have a road bladed to the top to allow water truck access or must have a sprinkler irrigation system installed, used and maintained

Requirement: Stabilize surface soils where support equipment and vehicles will operate.

- 19-3 Pre-water and maintain surface soils in a stabilized condition where support equipment and vehicles will operate.
- 19-4 Apply and maintain a dust palliative on surface soils where support equipment and vehicles will operate.

Requirement: Stabilize stockpile materials during handling.

- 19-5 Maintain stockpile materials with at least 70% optimum moisture content.
- 19-6 Remove material from the downwind side of the stockpile, when safe to do so.

Note: Select at least one of the above; in addition the appropriate control measure for your soil type must be selected from the following.

- 19-7 **L & ML:** Apply water during stacking, loading and unloading operations.
- 19-8 **MH:** Apply a water and tackifier mixture during stacking, loading and unloading operations.
- 19-9 **H:** Apply a water and surfactant mixture during stacking, loading and unloading operations.

(Continued on next page)

CONTROL MEASURES SELECTION PAGES

Requirement: Stabilize stockpiles at completion of activity.

- 19-10 Water stockpiles to form a crust immediately at the completion of activity.
- 19-11 Apply and maintain a dust palliative to all outer surfaces of the stockpiles.
- 19-12 Provide and maintain wind barriers on 3 sides of the pile, whose length is no less than equal to the length of the pile, whose distance from the pile is no more than twice the height of the pile, whose height is equal to the pile height, and made of material with a porosity of 50% or less.
- 19-13 Apply a cover or screen to stockpiles.

CONTROL MEASURES SELECTION PAGES

Asbestos Aatement

TRACKOUT PREVENTION AND CLEANUP

BMP 20

**YOU MUST SELECT AT LEAST ONE CONTROL MEASURE FOR EACH REQUIREMENT.
PLACE A CHECK IN THE BOX IN FRONT OF YOUR SELECTION.**

Requirement: In soils that have a PEP classification of "High", pave construction activities roadways as early as possible.

Requirement: Use of soil to create a ramp for vehicle access over a curb is prohibited.

Requirement: Trackout conditions, including preventive and corrective measures, must be recorded daily for every day that the construction project access is used by vehicles.

- 20-1 Record soil conditions and dust control actions in daily project records.

Requirement: Prevent dust from trackout.

- 20-2 Immediately clean trackout from paved surfaces to maintain dust control. Trackout must not extend 50 feet or more.
- 20-3 Maintain dust control during working hours and clean trackout from paved surfaces at the end of the work shift/day. Trackout must not extend 50 feet or more and must be cleaned daily, at minimum.

Requirement: Install and maintain trackout control devices in effective condition at all access points where paved and unpaved access or travel routes intersect.

- 20-4 Install gravel pad(s) consisting of 1" to 3" rough diameter, clean, well-graded gravel or crushed rock. Minimum dimensions must be 30 feet wide by 3 inches deep, and, at minimum, 50' or the length of the longest haul truck, whichever is greater. Re-screen, wash or apply additional rock in gravel pad to maintain effectiveness.
- 20-5 Install wheel shakers. Clean wheel shakers on a regular basis to maintain effectiveness.
- 20-6 Install wheel washers. Maintain wheel washers on a regular basis to maintain effectiveness.
- 20-7 Install wheel shakers in the event that trackout cannot be controlled with gravel pads.
- 20-8 Install wheel washer in the event that trackout cannot be controlled with gravel pads and wheel shakers.
- 20-9 Motorized vehicles will only operate on paved surfaces.

(Continued on next page)

CONTROL MEASURES SELECTION PAGES

Requirement: All exiting traffic must be routed over selected trackout control device(s).

- 20-10 Clearly establish and enforce traffic patterns to route traffic over selected trackout control device(s).
- 20-11 Limit site accessibility to routes with trackout control devices in place by installing effective barriers on unprotected routes.

CONTROL MEASURES SELECTION PAGES

Asbestos Aatement

TRENCHING

BMP 22

**YOU MUST SELECT AT LEAST ONE CONTROL MEASURE FOR EACH REQUIREMENT.
PLACE A CHECK IN THE BOX IN FRONT OF YOUR SELECTION.**

Requirement: Stabilize surface soils where trenching equipment, support equipment and vehicles will operate.

- 22-1 Pre-water and maintain surface soils in a stabilized condition where trenching equipment, support equipment and vehicles will operate.
- 22-2 Apply and maintain a dust palliative to surface soils where trenching equipment, support equipment and vehicles will operate.

Requirement: Presoak soils prior to trenching activities.

- 22-3 Pre-water surface, pre-trench to 18" depth, soak soils via pre-trench prior to deep trenching.
- 22-4 **L & ML:** Presoak soil with water using sprinklers or wobblers.
- 22-5 **L & ML:** Presoak with water, using water truck and/or water pull.
- 22-6 **MH:** Presoak soil with a water and tackifier mixture using water pulls and/or water trucks.
- 22-7 **MH:** Presoak soil with a water and tackifier mixture using sprinklers or wobblers.
- 22-8 **H:** Presoak soil with a water and surfactant mixture using water pulls and/or water trucks.
- 22-9 **H:** Presoak soil with a water and surfactant mixture using sprinklers or wobblers.

Requirement: Stabilize soil during trenching activities.

- 22-10 **L & ML:** Complete trenching with a dedicated water truck or large hose maintaining water as needed to prevent dust.
- 22-11 **L & ML:** Use spray nozzles mounted on trenching machine.
- 22-12 **MH:** Complete trenching with a dedicated water truck or large hose maintaining a water and tackifier mixture as needed to prevent dust.
- 22-13 **H:** Complete trenching with a dedicated water truck or large hose maintaining a water and surfactant mixture as needed to prevent dust.

(Continued on next page)

CONTROL MEASURES SELECTION PAGES

Asbestos Aatement

TRUCK LOADING

BMP 23

**YOU MUST SELECT AT LEAST ONE CONTROL MEASURE FOR EACH REQUIREMENT.
PLACE A CHECK IN THE BOX IN FRONT OF YOUR SELECTION.**

Requirement: Ensure all loads are covered prior to leaving the construction site and traveling on public roadways.

Requirement: Stabilize surface soils where loaders, support equipment and vehicles will operate.

- 23-1 Pre-water and maintain surface soils in a stabilized condition where loaders, support equipment and vehicles will operate.
- 23-2 Apply and maintain a dust palliative on surface soils where loaders, support equipment and vehicles will operate.

Requirement: Stabilize material during loading.

- 23-3 Empty loader bucket slowly and keep loader bucket close to the truck to minimize the drop height while dumping.

Note: You must selected 23-3 if PEP is greater than LOW, in addition one of the following must be selected.

- 23-4 **L & ML:** Mix material with water prior to loading.
- 23-5 **L & ML:** Spray material with water while loading.
- 23-6 **MH:** Mix material with a water and tackifier mixture prior to loading.
- 23-7 **MH:** Spray material with a water and tackifier mixture while loading.
- 23-8 **H:** Mix material with a water and surfactant mixture prior to loading.
- 23-9 **H:** Spray material with a water and surfactant mixture while loading.

Protecting the air we share

Air Quality

**CONSTRUCTION ACTIVITIES DUST CONTROL PERMIT
SUPPLEMENTAL PERMITS/APPROVALS CHECKLIST**

The following construction activities require permits or approval in addition to a Dust Control Permit. Permits or approvals must be obtained prior to conducting the activity. This form must be submitted with every Dust Mitigation Plan. *Check all activities that apply to the construction project.*

Activities requiring a Various Locations Permit (VLP):

(Comply with VLP regulations prior to installation of this equipment on the project site.)

Operation of a:

List Name of VLP Company and/or VLP#

- powered crusher at temporary locations. _____
- powered screen at temporary locations. _____
- concrete batch plant at temporary locations. _____
- asphalt batch plant at temporary locations. _____

Activities requiring Supplemental Permit:

(Submit applicable supplemental forms. Asbestos survey is required for any size demo/remodel. NESHAP notification is required for ANY size demolition or for remodel if RACM is found.)

- Blasting to fracture rock, hardpan, or caliche.
- Blasting to implode a structure.
- Demolition of a structure greater than 1,000 square feet.
 - Structural remodeling
 - Structure relocation

Activities requiring Authority to Construct (ATC) Certificate and Operating Permit:

(An ATC must be obtained prior to installation of this equipment/facility.)

- Construction of or installation of any Emission Unit
 - Gasoline Dispensing Facility
 - Cooling Tower
 - Dry Cleaning Equipment
 - Emergency Standby Generator or Other Internal Combustion Engine
 - Woodworking Process Equipment
 - Power Generation Facility or Equipment
 - Crushing or Screening Stationary Source
 - Concrete or Asphalt Plant Stationary Source
 - Commercial Surface Coating Equipment including Paint Spray Booth
 - Other Source of PM₁₀, CO, VOC, NO_x, SO₂, Lead, Hazardous Air Pollutant, or Toxic Chemical Substance
- Plating Shop
- Incinerator
- Boiler

Activities Listed Above Do Not Apply to this Construction Project:

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Air Quality



**OWNER'S DESIGNEE FORM
DUST CONTROL PERMIT for CONSTRUCTION ACTIVITIES**

An Excavation / Encroachment / Offsite permit for government owned land may be submitted in lieu of this form.

1. DESIGNEE INFORMATION:

Applicant/Permittee: Las Vegas Paving Cop.

Project Name: Asbestos Aatement

2. PROPERTY OWNER INFORMATION:

Property Owner Easement / Right of Way Holder

Name: Tronox, LLC.

Address: 560 W. Lake Mead Pkwy.

City: Henderson State: NV ZIP: 89015

Phone: 259-7727 Ext: _____ Fax: 651-2310

I certify that the property owner and/or easement/right-of-way holder has given me permission to act as the Designee and to act on his/her behalf in all matters regarding the issuance, modification, closure and all requirements of the DUST CONTROL PERMIT for Construction Activities. I understand that I am responsible for dust control on the property listed on this application until such time that the permit is closed in accordance with Air Quality Regulations. I have completed the Dust Control Class or will complete the Class, no later than thirty (30) days from today's date. Furthermore, I understand that I am responsible for ensuring the contractor(s), subcontractor(s), and all other persons associated with the Project comply with the "Conditions of Permit" and "Dust Mitigation Plan".

I declare under penalty of perjury that the foregoing is true and correct.

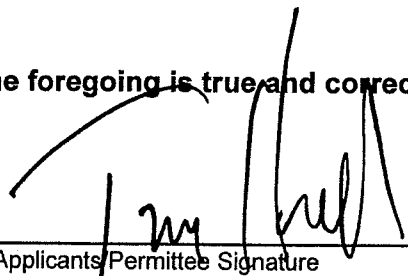
Executed on:

August 4, 2010

Date

Troy Hildreth

Printed Name



Applicants/Permittee Signature

Las Vegas Paving Corp.

Title and Company

10 12 4

38851



62,508
 Mod 0 p00

All construction traffic
 must use paved access
 to all projects unless
 specifically noted on plans

AGREE TO CHANGES _____ INITIAL _____
 DATE _____

158851
1 01 871 21 70 77



All construction traffic must use paved access to and from site unless specifically noted on map.

mod 0 = 6.6

AGREE TO CHANGES _____ INITIAL _____
DATE _____



Air Quality & Environmental Management

500 S. Grand Central Parkway, 1st floor
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CLARK COUNTY · LAS VEGAS · NORTH LAS VEGAS · BOULDER CITY · HENDERSON · MESQUITE

DUST CONTROL PERMIT FOR CONSTRUCTION ACTIVITIES INCLUDING SURFACE GRADING AND TRENCHING

THIS PERMIT DOES NOT EXEMPT THE PERMITTEE FROM COMPLIANCE WITH THE ENDANGERED SPECIES ACT

Permit Number:

PAYMENT INFORMATION:

20102623

38851

Mod: 1

Fee: \$4,999.20

Permittee and Project Information

Balance Due: \$

Permittee: Las Vegas Paving Corporation

Permittee Address: 4420 South Decatur Blvd

City, State, Zip: Las Vegas NV 89103

Fax No.: 7022579436

Project Name: Asbestos Abatement

Project Address: 560 West Lake Mead Pkwy

Located In: Township: 22 Range: 62 Section: 13 EO Area: SE

Acreage This Mod: 35.6 Total Acreage: 42.2

Cross Streets: E of US-95

Project Contact(s)

Normal Hours: Troy Hildreth
Company: Las Vegas Paving Corporation
Phone: (702)510-1278

After Hours: Troy Hildreth
Company: Las Vegas Paving Corp
Phone: (702)510-1278

Issue Date: 24-Aug-2010

Expiration Date:

09-Aug-2011

Effective Date: 8/24/10

Notes

Additional areas with the same property owner

- Request Of Sign Waiver
- Public Works Agreement
- Closure Plan
- Conditional Renewal

DUST CONTROL MEASURES MUST OCCUR 24 HOURS A DAY, 7 DAYS A WEEK

THIS PERMIT IS NOT VALID UNTIL ALL FEES ARE PAID IN FULL AND A COMPLETE COPY IS ON THE PROJECT SITE, INCLUDING CONDITIONS OF PERMIT AND DUST MITIGATION PLAN

It is a condition of the issuance of any operating permit required by the commission or pursuant to any local ordinance for the control of air pollution that the holder of the operating permit agrees to permit inspection of the premises to which the permit relates by any authorized officer of the department at any time during the holder's hours of operation without prior notice. This condition must be stated on each application form and operating permit, NRS 445B.580.

The issuance of this PERMIT does not relieve the PERMITTEE from compliance with all other applicable federal, state, county and local ordinances and regulations. Issuance of this PERMIT shall not be a defense to violations of any applicable ordinances or regulations.

AUG 18 2010

Air Quality

Protecting the air we share

DAQEM Use Only

RECEIVED
CC-DAQM

2010 AUG 19 P 2:30

APPLICATION FOR DUST CONTROL PERMIT MODIFICATION
Submit applicable fee per Section 18 of the Air Quality Regulations

1. PERMIT INFORMATION: Permit Number: 38851
Applicant/Permittee: Las Vegas Paving Corp.
Project Name: Asbestos abatement

2. IS MODIFICATION REQUESTED AS A RESULT OF A CAO? Yes No

3. INFORMATION TO BE MODIFIED:

Control Measures:

Attach Control Measure Selection Pages (DCP03) for all modifications.

Project Acreage:

Acreage to be added: 35.6 Acreage to be removed: _____
Attach a revised Assessor's Parcel Map showing the originally permitted area and the area to be added/removed. Include Owner's Designee form (DCP 05) if applicable.

Supplemental Forms:

Blasting Demolition VLP / HPVLP: List permit number and/or company name.
Attach Supplemental forms and Control Measure Selection Pages.

Other: additional areas with the same property owner

Attach modifications and/or current information.

4. SUBMITTED BY:

[Signature] Troy Hildreth
Signature Print Name
Las Vegas Paving Corp.
Company Name/Title
251-5800 08-17-2010
Phone Number Date

5. APPROVED BY:

[Signature] 8-23-10
DAQEM Permitting Approval Date
N/A
DAQEM Asbestos/Removal Approval Date

MODIFICATIONS SUBMITTED ON THIS FORM DO NOT CHANGE THE EXPIRATION DATE OF THE PERMIT.

ACREAGE ADDED WILL EXPIRE ON THE SAME DATE AS THE CURRENT PERMIT EXPIRATION.

DUST MITIGATION PLAN FOR
Asbestos Abatement

Prepared for:

Clark County Department
Of Air Quality & Environmental Management
500 South Grand Central Parkway
1st Floor
Las Vegas, Nevada 89155

Prepared By:

Las Vegas Paving Corp.
4420 S. Decatur Boulevard
Las Vegas, Nevada 89103

August 17, 2010

A. Project Description

1. This project consists of the removal and disposal of contaminated soils. The soil type that will be encountered during this project is listed as Moderate high. This designation was determined from figures 3 and 4 'Valley Soil Types Map' located in the Construction Activities Notebook.
2. A map for the project is included within this application.

B. Development Plan

1. Las Vegas Paving anticipates this project to continue for 10 months.

C. Estimated Proposed Expenditure

1. The costs for the miscellaneous products anticipated to be used on this project are as follows:

Water Truck with Driver	\$92.00 per Hour
Water	\$3.00 per 1,000 gallons
Surfactant	\$3.50 per 1,000 gallons of water

For this project, Las Vegas Paving anticipates that the water truck, operator, and water consumption will cost approximately \$124,983.00

D. Control Measures

All control measures are listed in the previous section.

E. Water Source Identification

Hydrants will be used to fill water trucks.

F. Soil Stabilization Measures

Las Vegas Paving plans on using water as our primary source of Dust Control. If water is not effective alone, then a surfactant will be added to the water at a rate of no less than 2 gallon per 4,000 gallons of water. Las Vegas Paving will keep records of any surfactant used for this project.

G. Employee Dust Control Training and Compliance

Mr. Tony Hainey the Project Superintendent will supervise the activities for this project. Mr. Hainey will work closely with Mr. Troy Hildreth, Las Vegas Paving's Environmental Department, if situations occur that conflicts with this mitigation plan.

CONTROL MEASURES SELECTION PAGES

DISTURBED LAND – Long-Term Stabilization

BMP 11

YOU MUST SELECT AT LEAST ONE CONTROL MEASURE FOR EACH REQUIREMENT.
PLACE A CHECK IN THE BOX IN FRONT OF YOUR SELECTION.

Requirement: Stabilize soil to meet standards required by Air Quality Regulation Section 90.

- 11-1 Apply and maintain a dust palliative on disturbed soils for long-term stabilization.
- 11-2 Stabilize disturbed soil with vegetation for long-term stabilization.
- 11-3 Pave or apply surface rock for long-term stabilization.
- 11-4 Use wind breaks in accordance with a site-specific plan approved by the Control Officer and Region IX Administrator of the EPA.
- 11-5 Apply water and maintain soils in a visible damp or crusted condition for temporary stabilization.

Requirement: Prevent access to limit soil disturbance.

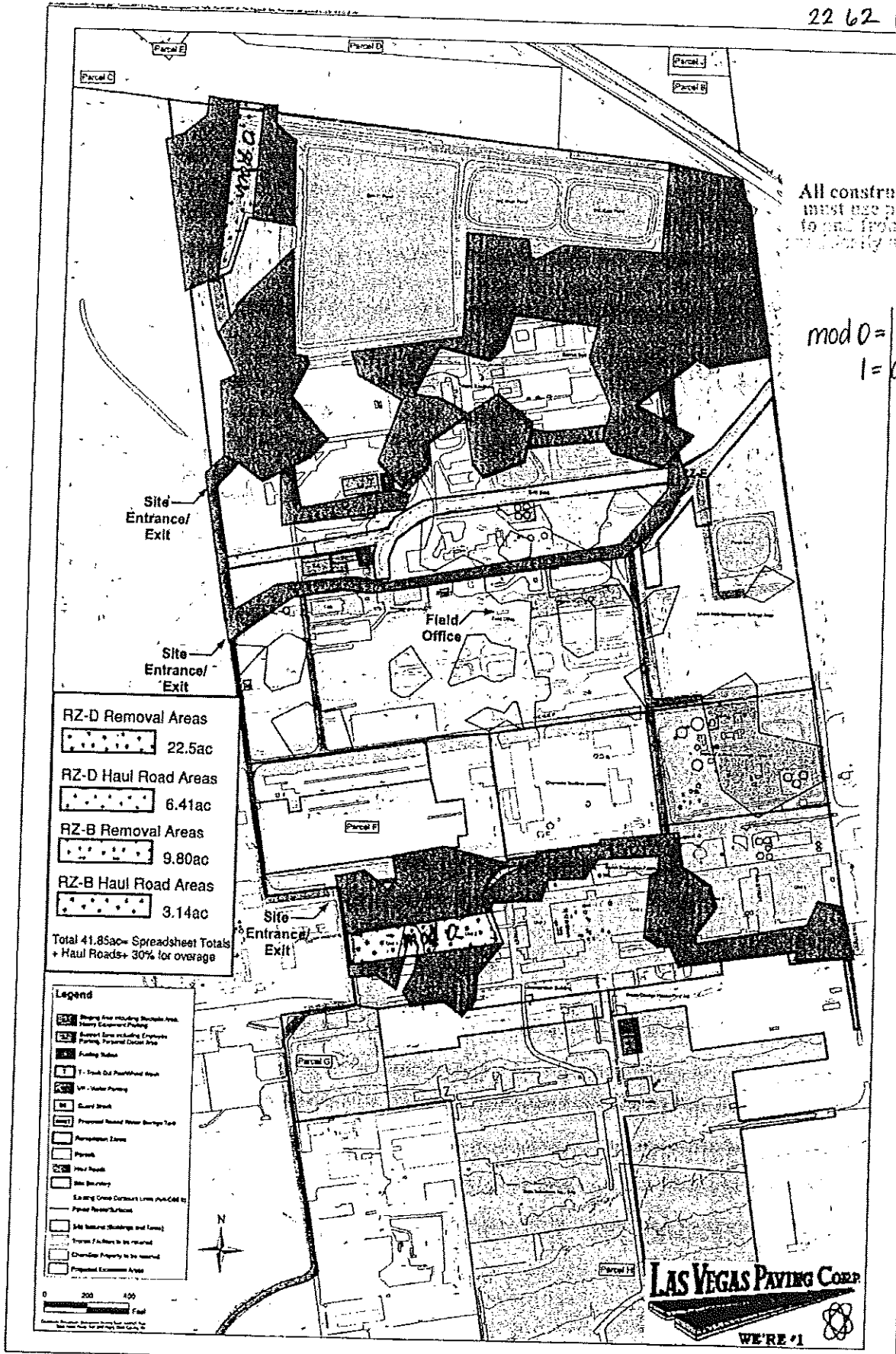
- 11-6 Prevent access by fencing, ditches, vegetation, berms or other suitable barrier or means approved by the Control Officer.

Recommendations: Plant perimeter vegetation early. Use of native and drought-tolerant plants with greater than 50 % silhouette area is encouraged.

See also: BMP 12: DUST SUPPRESSANT, DUST PALLIATIVE AND SURFACTANT – Selection and Use.

38851

22 62 12 178 12 2
178 13 1

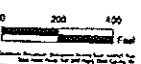


All construction traffic must use paved access to and from site unless otherwise noted on map.

mod 0 = 6.6
1 = add 35.6

RZ-D Removal Areas	22.5ac
RZ-D Haul Road Areas	6.41ac
RZ-B Removal Areas	9.80ac
RZ-B Haul Road Areas	3.14ac
Total 41.85ac= Spreadsheet Totals + Haul Roads+ 30% for overage	

- Legend**
- Storage Area including Storage Area, Heavy Equipment Parking
 - Access Road including Employee Parking, Personnel Access Road
 - Paving Subsoil
 - Truck Oil Spill/Wash Area
 - Water Paving
 - Guard Wall
 - Personnel Access Water Storage Tank
 - Perimeter Fence
 - Paved Area
 - Haul Road
 - Site Boundary
 - Existing Green Contour Lines (provided by Paper Records/Services)
 - Site Natural Obstacles and Trees
 - Transfer Facilities to be retained
 - Chemical Property to be retained
 - Proposed Excavation Area



2

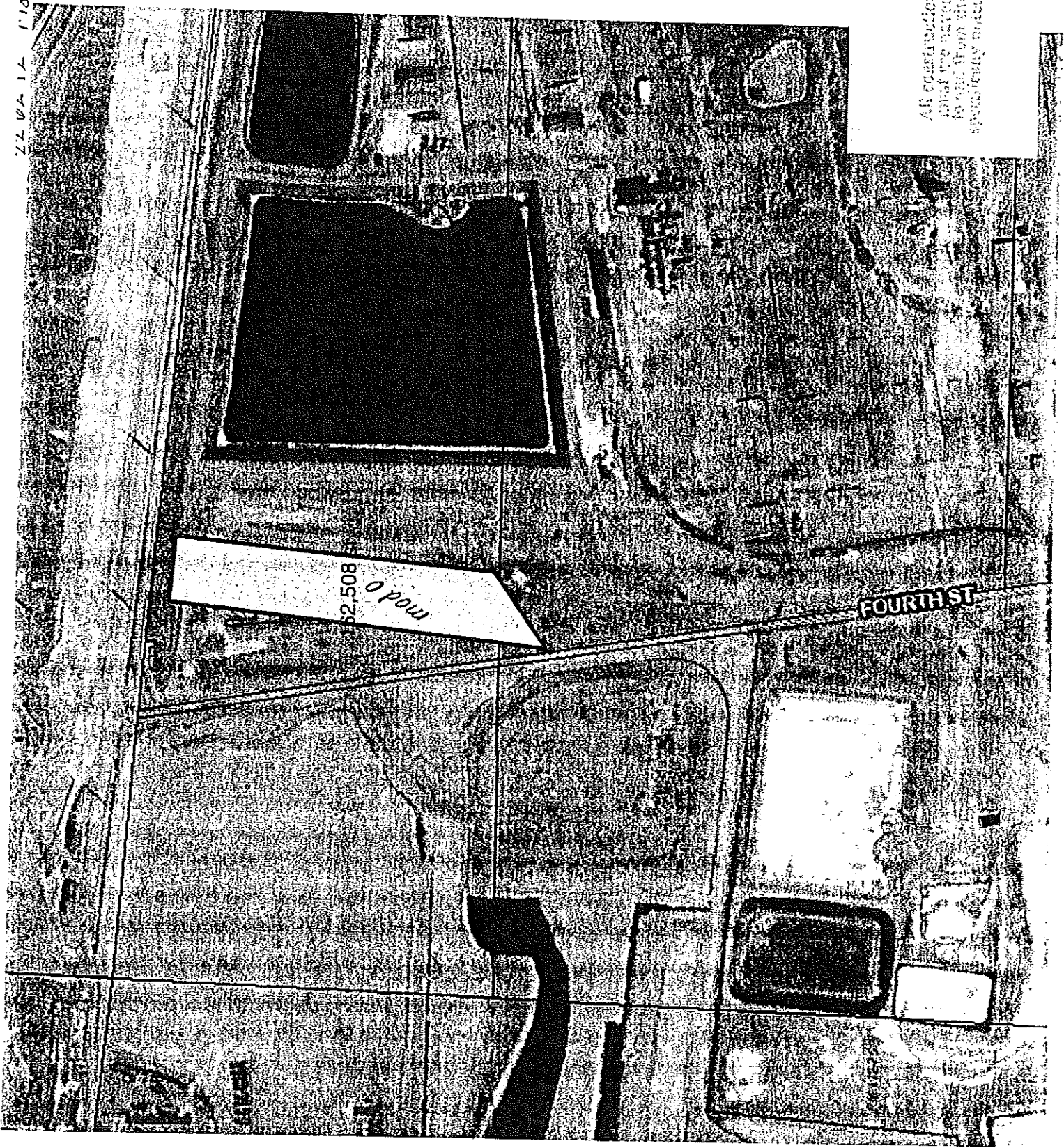
Mod #1= addition of 35.6 acres, 8-17-10

AGREE TO CHANGES _____ INITIAL _____
DATE _____

northgate
environmental management, inc
THORNDIX <http://www.ngem.com>

22 WA 14 118 12 2

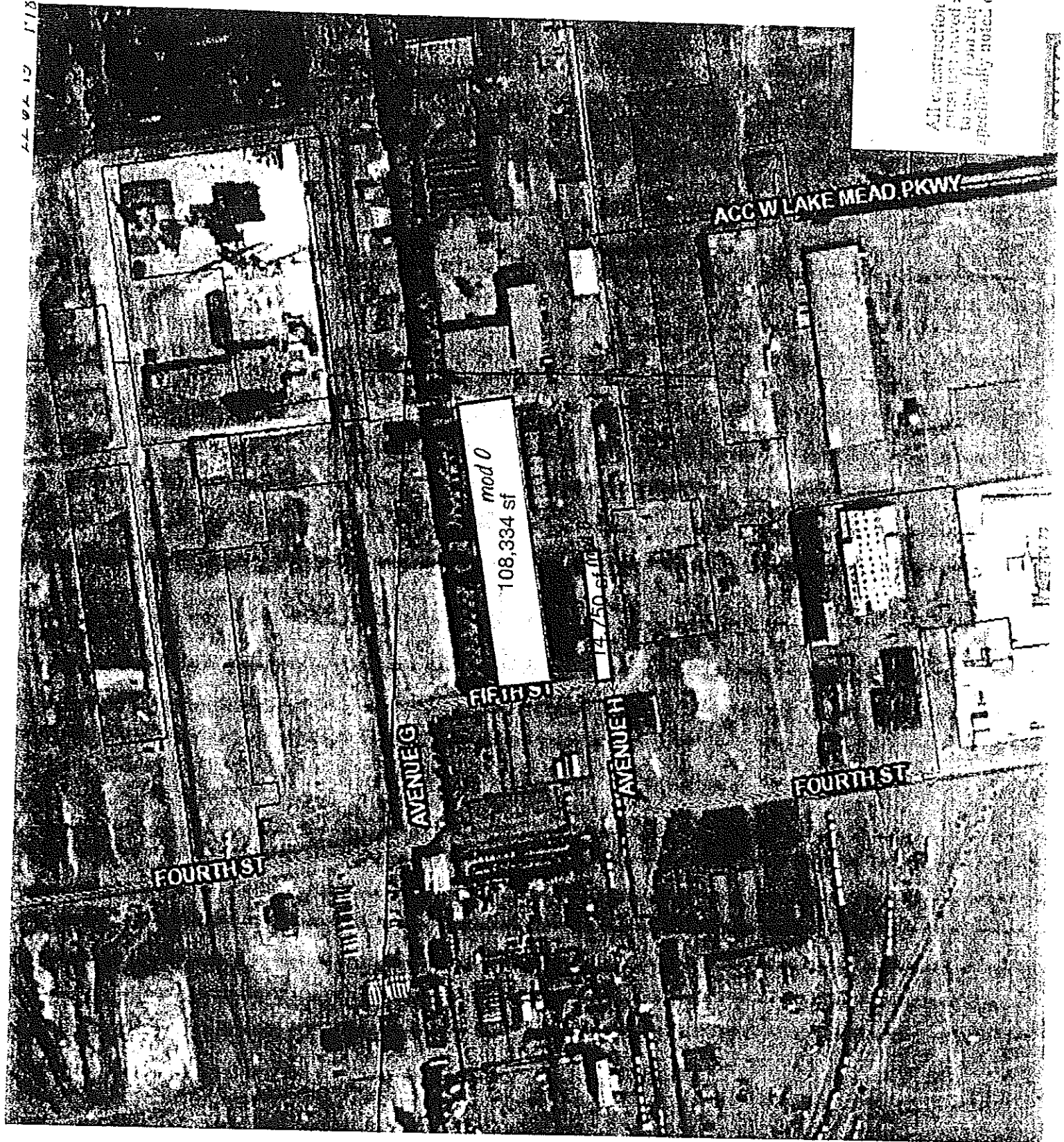
38851



All construction traffic
 must be routed around
 to east from site through
 specifically marked by sign.

AGREE TO CHANGES KB
 DATE 8-12-10 INITIAL

118 121
38851.



All construction traffic
must be allowed access
to this lot and site unless
specifically noted on map.

mod 0 = 6.6

AGREE TO CHANGES

DATE 8-12-10

XB
INITIAL



Air Quality & Environmental Management

500 S. Grand Central Parkway, 1st floor
Las Vegas NV · 89155-1776
(702) 455-5942 · Fax (702) 383-9994



CLARK COUNTY · LAS VEGAS · NORTH LAS VEGAS · BOULDER CITY · HENDERSON · MESQUITE

DUST CONTROL PERMIT FOR CONSTRUCTION ACTIVITIES INCLUDING SURFACE GRADING AND TRENCHING

THIS PERMIT DOES NOT EXEMPT THE PERMITTEE FROM COMPLIANCE WITH THE ENDANGERED SPECIES ACT

Permit Number:

PAYMENT INFORMATION:

20102781

38851

Mod: 2

Fee: **\$583.20**

Balance Due: \$

0

Permittee and Project Information

Permittee: **Las Vegas Paving Corporation**

Permittee Address: **4420 South Decatur Blvd**

City, State, Zip: **Las Vegas NV 89103**

Fax No.: **7022579436**

Project Name: **Asbestos Abatement**

Project Address: **560 West Lake Mead Pkwy**

Located In: **Township: 22 Range: 62 Section: 13 EO Area: SE**

Acreage This Mod: **3.8** Total Acreage: **46**

Cross Streets: **E of US-95**

Project Contact(s)

Normal Hours: **Troy Hildreth**

After Hours: **Troy Hildreth**

Company: **Las Vegas Paving Corporation**

Company: **Las Vegas Paving Corp**

Phone: **(702)510-1278**

Phone: **(702)510-1278**

Issue Date: **07-Sep-2010**

Expiration Date:

08-Aug-2011

Effective Date: _____

Request Of Sign Waiver

Public Works Agreement

Closure Plan

Conditional Renewal

Notes

Additional acreage on parcel already permitted

DUST CONTROL MEASURES MUST OCCUR 24 HOURS A DAY, 7 DAYS A WEEK

THIS PERMIT IS NOT VALID UNTIL ALL FEES ARE PAID IN FULL AND A COMPLETE COPY IS ON THE PROJECT SITE, INCLUDING CONDITIONS OF PERMIT AND DUST MITIGATION PLAN

It is a condition of the issuance of any operating permit required by the commission or pursuant to any local ordinance for the control of air pollution that the holder of the operating permit agrees to permit inspection of the premises to which the permit relates by any authorized officer of the department at any time during the holder's hours of operation without prior notice. This condition must be stated on each application form and operating permit. NRS 445B.580.

The issuance of this PERMIT does not relieve the PERMITTEE from compliance with all other applicable federal, state, county and local ordinances and regulations. Issuance of this PERMIT shall not be a defense to violations of any applicable ordinances or regulations.



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2010 SEP 1

12:02

APPLICATION FOR DUST CONTROL PERMIT MODIFICATION

Submit applicable fee per Section 18 of the Air Quality Regulations

1. PERMIT INFORMATION: Permit Number: 38851

Applicant/Permittee: Las Vegas Paving Corp.

Project Name: Asbestos Abatement

2. IS MODIFICATION REQUESTED AS A RESULT OF A CAO? Yes No

3. INFORMATION TO BE MODIFIED:

Control Measures:

Attach Control Measure Selection Pages (DCP03) for all modifications.

Project Acreage:

Acreage to be added: 3.8 Acreage to be removed: _____

Attach a revised Assessor's Parcel Map showing the originally permitted area and the area to be added/removed. Include Owner's Designee form (DCP 05) if applicable.

Supplemental Forms:

Blasting Demolition VLP / HPVLP: List permit number and/or company name.

Attach Supplemental forms and Control Measure Selection Pages.

Other:

additional acreage on parcel already permitted

Attach modifications and/or current information.

4. SUBMITTED BY:

Troy Hildreth

Signature

Print Name

Las Vegas Paving Corp.

Company Name/Title

702-251-5800

08-30-2010

Phone Number

Date

5. APPROVED BY:

DAQEM Permitting Approval N/A

Date

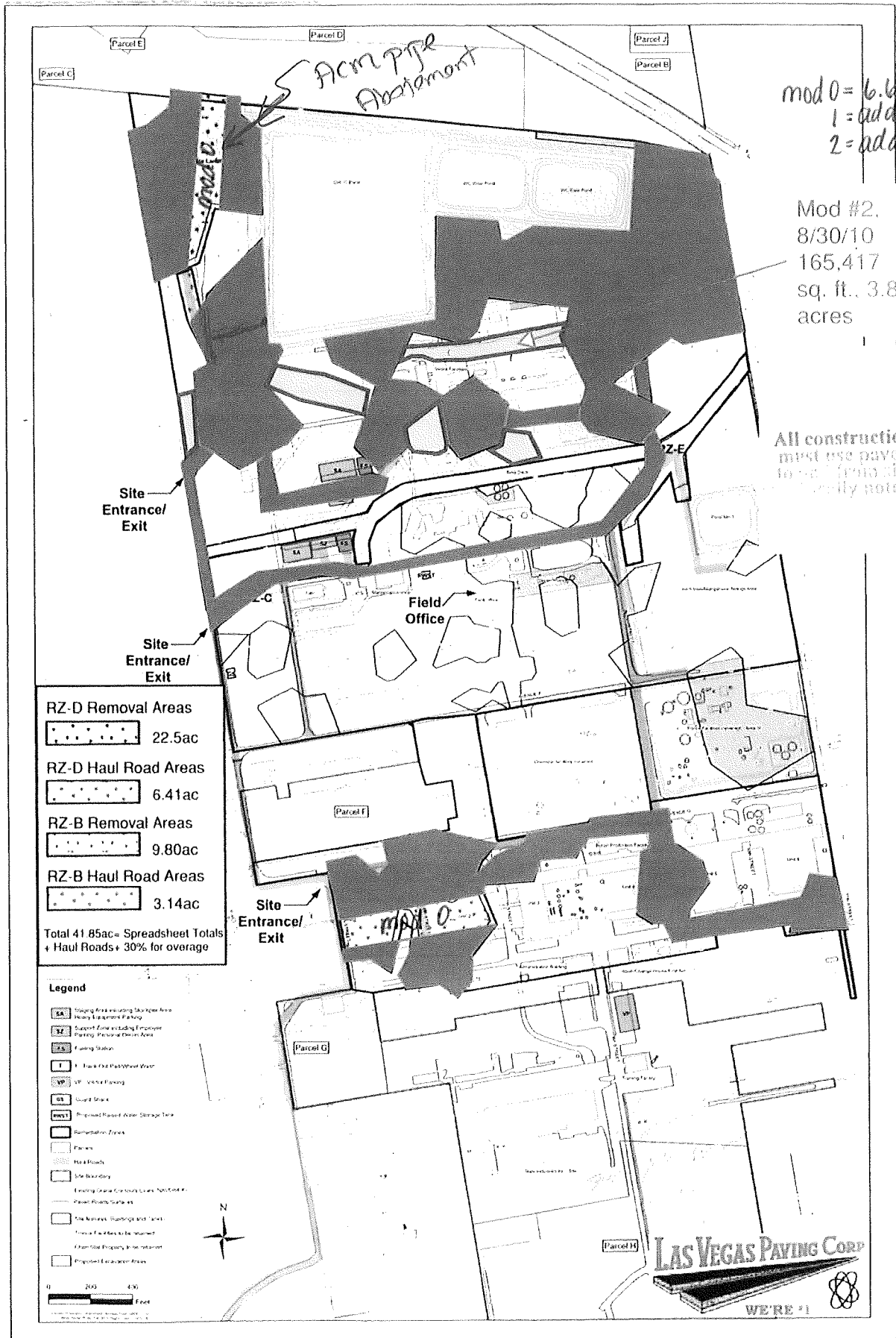
9.2.10

DAQEM Asbestos/Removal Approval

Date

MODIFICATIONS SUBMITTED ON THIS FORM DO NOT CHANGE THE EXPIRATION DATE OF THE PERMIT.

ACREAGE ADDED WILL EXPIRE ON THE SAME DATE AS THE CURRENT PERMIT EXPIRATION.



mod 0 = 6.6
1 = add 35.6 (green)
2 = add 3.8 (yellow)

Mod #2,
8/30/10
165,417
sq. ft. 3.8
acres

All construction traffic
must use paved access
to site from site unless
otherwise noted on map.

RZ-D Removal Areas	22.5ac
RZ-D Haul Road Areas	6.41ac
RZ-B Removal Areas	9.80ac
RZ-B Haul Road Areas	3.14ac
Total 41.85ac= Spreadsheet Totals + Haul Roads + 30% for overage	

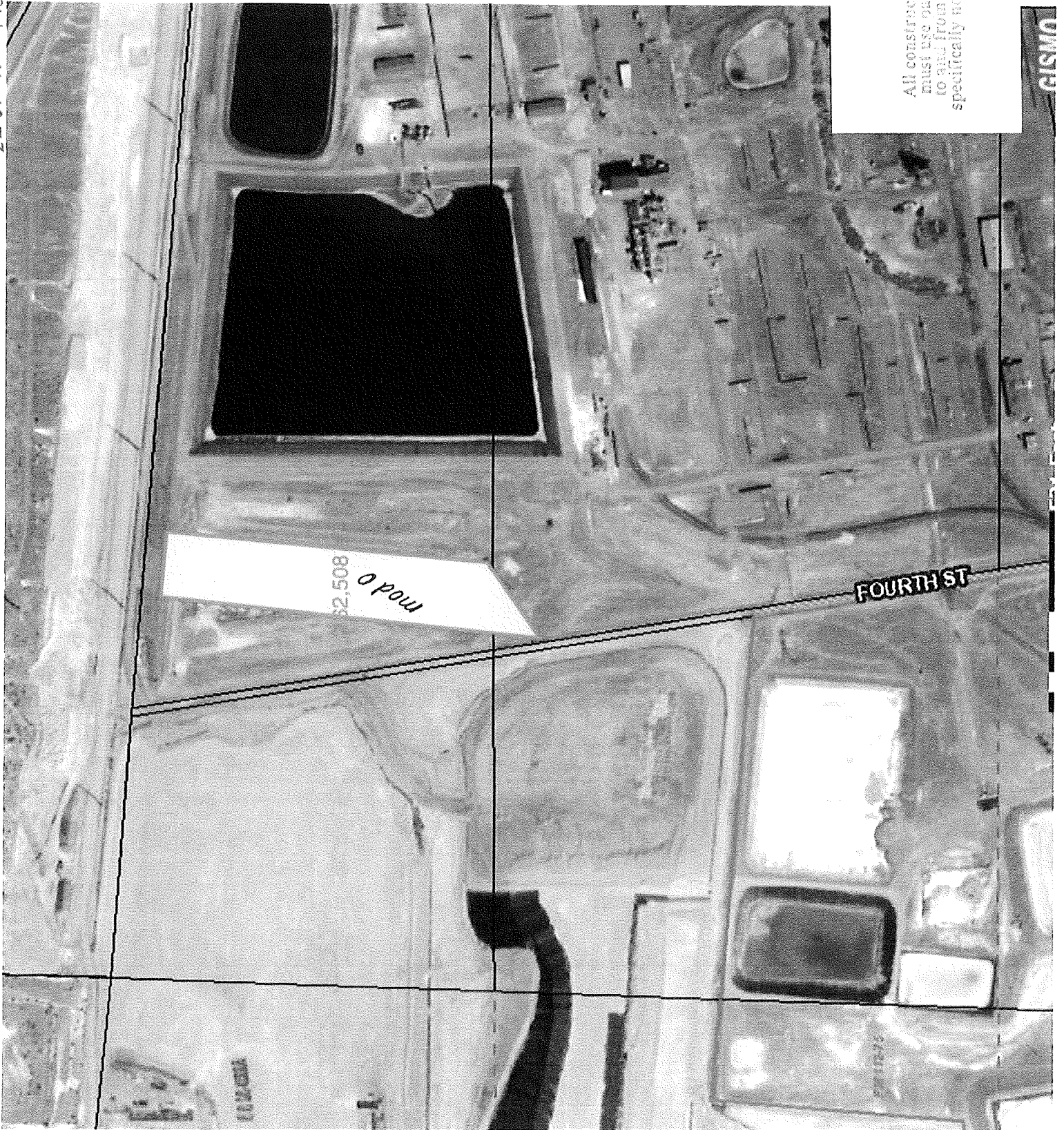
2

Mod #1 = addition of 35.6 acres. 8-17-10

northgate
environmental management, inc.
TRONIX <http://www.ngem.com>

22 02 12 178 12 2

38851



All construction traffic
 must use paved access
 to and from site tolets
 specifically noted on map.

GISMO

AGREE TO CHANGES

KB

INITIAL

DATE 8-12-10

220215 176101

38851



All construction traffic
 must use paved access
 to and from site unless
 specifically noted on map.

GISMO

mod 0 = 6.6

AGREE TO CHANGES _____
 DATE 8-12-10 _____
 INITIAL *JB*



Air Quality & Environmental Management

500 S. Grand Central Parkway, 1st floor
Las Vegas NV · 89155-1776
(702) 455-5942 · Fax (702) 383-9994



CLARK COUNTY · LAS VEGAS · NORTH LAS VEGAS · BOULDER CITY · HENDERSON · MESQUITE

DUST CONTROL PERMIT FOR CONSTRUCTION ACTIVITIES INCLUDING SURFACE GRADING AND TRENCHING

THIS PERMIT DOES NOT EXEMPT THE PERMITTEE FROM COMPLIANCE WITH THE ENDANGERED SPECIES ACT

Permit Number:

PAYMENT INFORMATION:

20103364

38851

Mod: 3

Fee: **\$169.20**

Balance Due: \$

Permittee and Project Information

Permittee:	Las Vegas Paving Corporation		
Permittee Address:	4420 South Decatur Blvd		
City, State, Zip:	Las Vegas NV 89103	Fax No.:	7022579436
Project Name:	Asbestos Abatement		
Project Address:	560 West Lake Mead Pkwy		
Located In:	<i>Township: 22</i>	<i>Range: 62</i>	<i>Section: 12</i> EO Area: SE
Acreage This Mod:	0.9	Total Acreage:	46.9
Cross Streets:	E of US-95		

Project Contact(s)

Normal Hours: **Troy Hildreth**
Company: **Las Vegas Paving Corporation**
Phone: **(702)510-1278**

After Hours: **Troy Hildreth**
Company: **Las Vegas Paving Corp**
Phone: **(702)510-1278**

Issue Date: 03-Nov-2010

Expiration Date:

07-Aug-2011

Effective Date: _____

- Request Of Sign Waiver
- Public Works Agreement
- Closure Plan
- Conditional Renewal

Notes

Add 0.9

DUST CONTROL MEASURES MUST OCCUR 24 HOURS A DAY, 7 DAYS A WEEK

THIS PERMIT IS NOT VALID UNTIL ALL FEES ARE PAID IN FULL AND A COMPLETE COPY IS ON THE PROJECT SITE, INCLUDING CONDITIONS OF PERMIT AND DUST MITIGATION PLAN

It is a condition of the issuance of any operating permit required by the commission or pursuant to any local ordinance for the control of air pollution that the holder of the operating permit agrees to permit inspection of the premises to which the permit relates by any authorized officer of the department at any time during the holder's hours of operation without prior notice. This condition must be stated on each application form and operating permit. NRS 445B.580.

The issuance of this PERMIT does not relieve the PERMITTEE from compliance with all other applicable federal, state, county and local ordinances and regulations. Issuance of this PERMIT shall not be a defense to violations of any applicable ordinances or regulations.



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DEPARTMENT OF AIR QUALITY & ENVIRONMENTAL MANAGEMENT

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2010 OCT 27 P 1:09

APPLICATION FOR DUST CONTROL PERMIT MODIFICATION

Submit applicable fee per Section 18 of the Air Quality Regulations

1. **PERMIT INFORMATION:** Permit Number: 38851
 Applicant/Permittee: Las Vegas Paving Corp.
 Project Name: Asbestos Abatement
 Email Address: thildreth@lasvegaspaving.com

2. **IS MODIFICATION REQUESTED AS A RESULT OF A CAO?** Yes No

3. **INFORMATION TO BE MODIFIED:**

Control Measures:

Attach Control Measure Selection Pages (DCP03) for all modifications.

Project Acreage:

Acreage to be added: 0.9 Acreage to be removed: _____
 Attach a revised Assessor's Parcel Map showing the originally permitted area and the area to be added/removed.

Supplemental Forms:

Blasting Demolition VLP: List permit number and/or company name.
 Attach Supplemental forms and Control Measure Selection Pages.

Other:

Attach modifications and/or current information.

By signing this application, submitter attests he/she has read and understood the existing Dust Control Permit and associated documents, and agrees to abide by all conditions and requirements of that permit.

4. **SUBMITTED BY:**

Troy Hildreth Signature Troy Hildreth Print Name
Las Vegas Paving Corp.
 Company Name/Title
702-251-5800 Phone Number 10-25-2010 Date

5. **APPROVED BY:**

[Signature] DAQEM Permitting Approval 10-28-10 Date
N/A DAQEM Asbestos/Removal Approval Date

MODIFICATIONS SUBMITTED ON THIS FORM DO NOT CHANGE THE EXPIRATION DATE OF THE PERMIT. ACREAGE ADDED WILL EXPIRE ON THE SAME DATE AS THE CURRENT PERMIT EXPIRATION.

38851

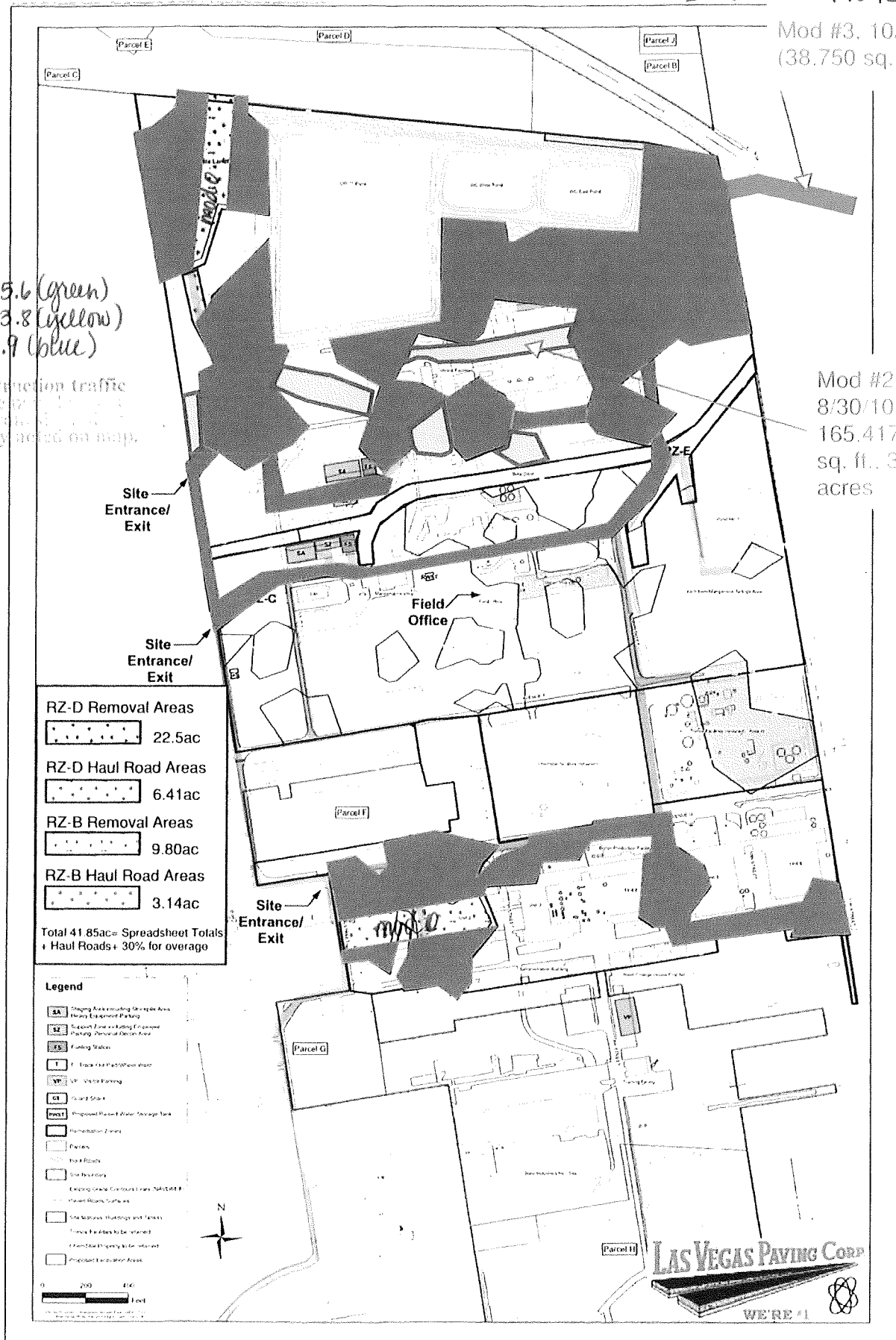
22 62 12 178 12 2 178 13 1

Mod #3. 10/25/10
(38.750 sq. ft.)

mod 0 = 6.6
1 = add 35.6 (green)
2 = add 3.8 (yellow)
3 = add 0.9 (blue)

All construction traffic
must proceed
to and from
specifically noted on map.

Mod #2.
8/30/10
165,417
sq. ft., 3.8
acres



RZ-D Removal Areas	22.5ac
RZ-D Haul Road Areas	6.41ac
RZ-B Removal Areas	9.80ac
RZ-B Haul Road Areas	3.14ac
Total 41.85ac= Spreadsheet Totals + Haul Roads+ 30% for overage	

- Legend**
- AA Staging Area including Storage Area Heavy Equipment Parking
 - BZ Staging Zone including Employee Parking Personnel Access Area
 - ES Staging Status
 - R Road for Traffic/Access
 - VP Vehicle Parking
 - GS Guard Shack
 - PTST Proposed Parcel Storage Tank
 - Remediation Zones
 - Fences
 - Haul Roads
 - Site Features
 - Existing and Proposed Utilities
 - Existing and Proposed Utilities
 - Site Features (Hatchery and Tanks)
 - Tanks Features to be retained
 - Remediation Property to be retained
 - Proposed Remediation Areas

2

Mod #1 = addition of 35.6 acres. 8-17-10

northgate
environmental management, inc.
TRONOX <http://www.ngem.com>



GISMO

521 Feet

mod 3

178 12 6

38851

COHEN ST

SAWH

W WARM SPRINGS RD

PABCORD

N BOULDER HWY



Air Quality & Environmental Management

500 S. Grand Central Parkway, 1st floor
Las Vegas NV · 89155-1776
(702) 455-5942 · Fax (702) 383-9994



CLARK COUNTY · LAS VEGAS · NORTH LAS VEGAS · BOULDER CITY · HENDERSON · MESQUITE

DUST CONTROL PERMIT FOR CONSTRUCTION ACTIVITIES INCLUDING SURFACE GRADING AND TRENCHING

THIS PERMIT DOES NOT EXEMPT THE PERMITTEE FROM COMPLIANCE WITH THE ENDANGERED SPECIES ACT

Permit Number:

PAYMENT INFORMATION:

20103457

38851

Mod: 4

Fee: \$4,171.20

Permittee and Project Information

Balance Due: \$

Permittee:	Las Vegas Paving Corporation		
Permittee Address:	4420 South Decatur Blvd		
City, State, Zip:	Las Vegas NV 89103	Fax No.:	7022579436
Project Name:	Asbestos Abatement		
Project Address:	560 West Lake Mead Pkwy		
Located In:	Township: 22	Range: 62	Section: 12 EO Area: SE
Acreage This Mod:	30	Total Acreage:	76.9
Cross Streets:	E of US-95		

Project Contact(s)

Normal Hours:	Troy Hildreth	After Hours:	Troy Hildreth
Company:	Las Vegas Paving Corporation	Company:	Las Vegas Paving Corp
Phone:	(702)510-1278	Phone:	(702)510-1278

Issue Date: 22-Nov-2010

Expiration Date:

06-Aug-2011

Effective Date: _____

Notes

Add 30 acres

- Request Of Sign Waiver
- Public Works Agreement
- Closure Plan
- Conditional Renewal

DUST CONTROL MEASURES MUST OCCUR 24 HOURS A DAY, 7 DAYS A WEEK

THIS PERMIT IS NOT VALID UNTIL ALL FEES ARE PAID IN FULL AND A COMPLETE COPY IS ON THE PROJECT SITE, INCLUDING CONDITIONS OF PERMIT AND DUST MITIGATION PLAN

It is a condition of the issuance of any operating permit required by the commission or pursuant to any local ordinance for the control of air pollution that the holder of the operating permit agrees to permit inspection of the premises to which the permit relates by any authorized officer of the department at any time during the holder's hours of operation without prior notice. This condition must be stated on each application form and operating permit. NRS 445B.580.

The issuance of this PERMIT does not relieve the PERMITTEE from compliance with all other applicable federal, state, county and local ordinances and regulations. Issuance of this PERMIT shall not be a defense to violations of any applicable ordinances or regulations.



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DEPARTMENT OF AIR QUALITY & ENVIRONMENTAL MANAGEMENT

DAQEM Use Only

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2010 NOV -5 A 11: 14

APPLICATION FOR DUST CONTROL PERMIT MODIFICATION

Submit applicable fee per Section 18 of the Air Quality Regulations

1. PERMIT INFORMATION: Permit Number: 38851
 Applicant/Permittee: Las Vegas Paving Corp.
 Project Name: Asbestos Abatement
 Email Address: thildreth@lasvegaspaving.com

2. IS MODIFICATION REQUESTED AS A RESULT OF A CAO? Yes No

3. INFORMATION TO BE MODIFIED:

Control Measures:

Attach Control Measure Selection Pages (DCP03) for all modifications.

Project Acreage:

Acreage to be added: 30 Acreage to be removed: _____
 Attach a revised Assessor's Parcel Map showing the originally permitted area and the area to be added/removed.

Supplemental Forms: see mod 5

Blasting Demolition VLP: List permit number and/or company name.

Attach Supplemental forms and Control Measure Selection Pages.

Other:

Attach modifications and/or current information.

By signing this application, submitter attests he/she has read and understood the existing Dust Control Permit and associated documents, and agrees to abide by all conditions and requirements of that permit.

4. SUBMITTED BY:

Troy Hildreth Signature Troy Hildreth Print Name
Las Vegas Paving Corp. / Environmental
 Company Name/Title
702-251-5800 Phone Number 11-03-2010 Date

5. APPROVED BY:

[Signature] DAQEM Permitting Approval 11-19-10 Date
N/A
 DAQEM Asbestos Removal Approval see mod 5 Date

MODIFICATIONS SUBMITTED ON THIS FORM DO NOT CHANGE THE EXPIRATION DATE OF THE PERMIT. ACREAGE ADDED WILL EXPIRE ON THE SAME DATE AS THE CURRENT PERMIT EXPIRATION.

CONTROL MEASURES SELECTION PAGES

BACKFILLING

BMP 01

**YOU MUST SELECT AT LEAST ONE CONTROL MEASURE FOR EACH REQUIREMENT.
PLACE A CHECK IN THE BOX IN FRONT OF YOUR SELECTION.**

Requirement: Stabilize backfill material when not actively handling.

- 01-1 Water backfill material to maintain moisture or to form crust when not actively handling.
- 01-2 Apply and maintain a dust palliative to backfill material to form crust when not actively handling.
- 01-3 Cover or enclose backfill material when not actively handling.

Requirement: Stabilize backfill material during handling.

- 01-4 Empty loader bucket slowly and minimize drop height from loader bucket.
- 01-5 Dedicate water truck or large hose to backfilling equipment and apply water as needed.

Note: Select at least one of the above; In addition the appropriate control measure for your soil type must be selected from the following.

- 01-6 L: Mix moist soil with dry soil until the optimum moisture is reached.
- 01-7 ML: Apply and mix water into the backfill material until optimum moisture is reached.
- 01-8 MH: Apply and mix water and tackifier solution into the backfill material until optimum moisture is reached.
- 01-9 H: Apply and mix water and surfactant solution into the backfill material until optimum moisture is reached.

Requirement: Stabilize soil at completion of backfilling activity.

- 01-10 Apply water and maintain disturbed soils in a stable condition until permanent stabilization is complete.
- 01-11 Apply and maintain a dust palliative on disturbed soils to form a crust following backfilling activity.

Requirement: Stabilize material while using pipe padder equipment.

- 01-12 Mix moist soil with dry soil until the optimum moisture is reached.
- 01-13 Dedicate water truck or large hose to equipment and apply water as needed.

CONTROL MEASURES SELECTION PAGES

STOCKPILING

BMP 19

**YOU MUST SELECT AT LEAST ONE CONTROL MEASURE FOR EACH REQUIREMENT.
PLACE A CHECK IN THE BOX IN FRONT OF YOUR SELECTION.**

Requirement: To the extent possible, maintain stockpile to avoid steep sides or faces.

Requirement: Stockpile location and height must be maintained pursuant to Air Quality Regulations. Stockpiles located within 100 yards of occupied buildings must not be constructed over 8 feet in height.

- 19-1 Stockpiles will not be constructed over 8 feet in height.
- 19-2 Stockpiles will be constructed over 8 feet high and must have a road bladed to the top to allow water truck access or must have a sprinkler irrigation system installed, used and maintained.

Requirement: Stabilize surface soils where support equipment and vehicles will operate.

- 19-3 Pre-water and maintain surface soils in a stabilized condition where support equipment and vehicles will operate.
- 19-4 Apply and maintain a dust palliative on surface soils where support equipment and vehicles will operate.

Requirement: Stabilize stockpile materials during handling.

- 19-5 Maintain stockpile materials with at least 70% optimum moisture content.
- 19-6 Remove material from the downwind side of the stockpile, when safe to do so.

Note: Select at least one of the above; In addition the appropriate control measure for your soil type must be selected from the following:

- 19-7 L & ML: Apply water during stacking, loading and unloading operations.
- 19-8 MH: Apply a water and tackifier mixture during stacking, loading and unloading operations.
- 19-9 H: Apply a water and surfactant mixture during stacking, loading and unloading operations.

(Continued on next page)

CONTROL MEASURES SELECTION PAGES

Requirement: Stabilize stockpiles at completion of activity.

- 19-10 Water stockpiles to form a crust immediately at the completion of activity.
- 19-11 Apply and maintain a dust palliative to all outer surfaces of the stockpiles.
- 19-12 Provide and maintain wind barriers on 3 sides of the pile, whose length is no less than equal to the length of the pile, whose distance from the pile is no more than twice the height of the pile, whose height is equal to the pile height, and made of material with a porosity of 50% or less.
- 19-13 Apply a cover or screen to stockpiles.

CONTROL MEASURES SELECTION PAGES

TRENCHING

BMP 22

**YOU MUST SELECT AT LEAST ONE CONTROL MEASURE FOR EACH REQUIREMENT.
PLACE A CHECK IN THE BOX IN FRONT OF YOUR SELECTION.**

Requirement: Stabilize surface soils where trenching equipment, support equipment and vehicles will operate.

- 22-1 Pre-water and maintain surface soils in a stabilized condition where trenching equipment, support equipment and vehicles will operate.
- 22-2 Apply and maintain a dust palliative to surface soils where trenching equipment, support equipment and vehicles will operate.

Requirement: Presoak soils prior to trenching activities.

- 22-3 Pre-water surface, pre-trench to 18" depth, soak soils via pre-trench prior to deep trenching.
- 22-4 L & ML: Presoak soil with water using sprinklers or wobblers.
- 22-5 L & ML: Presoak with water, using water truck and/or water pull.
- 22-6 MH: Presoak soil with a water and tackifier mixture using water pulls and/or water trucks.
- 22-7 MH: Presoak soil with a water and tackifier mixture using sprinklers or wobblers.
- 22-8 H: Presoak soil with a water and surfactant mixture using water pulls and/or water trucks.
- 22-9 H: Presoak soil with a water and surfactant mixture using sprinklers or wobblers.

Requirement: Stabilize soil during trenching activities.

- 22-10 L & ML: Complete trenching with a dedicated water truck or large hose maintaining water as needed to prevent dust.
- 22-11 L & ML: Use spray nozzles mounted on trenching machine.
- 22-12 MH: Complete trenching with a dedicated water truck or large hose maintaining a water and tackifier mixture as needed to prevent dust.
- 22-13 H: Complete trenching with a dedicated water truck or large hose maintaining a water and surfactant mixture as needed to prevent dust.

(Continued on next page)

CONTROL MEASURES SELECTION PAGES

Requirement: Stabilize soils at the completion of trenching activities.

- 22-14 Use water to form crust on excavated soil windrow as it is formed.
- 22-15 Use dust palliative to form crust on excavated soil windrow as it is formed.

Recommendations: Wash mud and soil from equipment at completion of trench to prevent crusting and drying of soil on equipment.

See also: BMP 01: BACKFILLING, if applicable.

CONTROL MEASURES SELECTION PAGES

TRUCK LOADING

BMP 23

**YOU MUST SELECT AT LEAST ONE CONTROL MEASURE FOR EACH REQUIREMENT.
PLACE A CHECK IN THE BOX IN FRONT OF YOUR SELECTION.**

Requirement: Ensure all loads are covered prior to leaving the construction site and traveling on public roadways.

Requirement: Stabilize surface soils where loaders, support equipment and vehicles will operate.

- 23-1 Pre-water and maintain surface soils in a stabilized condition where loaders, support equipment and vehicles will operate.
- 23-2 Apply and maintain a dust palliative on surface soils where loaders, support equipment and vehicles will operate.

Requirement: Stabilize material during loading.

- 23-3 Empty loader bucket slowly and keep loader bucket close to the truck to minimize the drop height while dumping.

Note: You must selected 23-3 if PEP is greater than LOW, in addition one of the following must be selected.

- 23-4 L & ML: Mix material with water prior to loading.
- 23-5 L & ML: Spray material with water while loading.
- 23-6 MH: Mix material with a water and tackifier mixture prior to loading.
- 23-7 MH: Spray material with a water and tackifier mixture while loading.
- 23-8 H: Mix material with a water and surfactant mixture prior to loading.
- 23-9 H: Spray material with a water and surfactant mixture while loading.

Protecting the air we share

Air Quality

CONSTRUCTION SITE DUST CONTROL MONITOR

Air Quality Regulation Section 94.7.5 requires a Dust Control Monitor for any construction project that has 50 acres or more of disturbed soils. This requirement is applicable to multiple sites that are individually permitted at less than 50 acres each, if they are adjacent to one another, under common ownership, or are within a master planned community, and together they have 50 acres or more of disturbed soil.

Permittee: Las Vegas Paving Corp.

Project Name and Dust Control Permit Number(s):

Project Name	Permit number	Acreage
Asbestos Abatement	38851	78.1
Total Acreage:		78.1

Monitor's Name: Randy Harrison

Company: Las Vegas Paving Corp.

Dust Monitor Card #: DM0622008 x 11/1/11 Cellular Phone #: (702) 510-1278

Office Phone #: (702) 251-5800 FAX #: (702) 257-9436

38851

22 62 12 178 12 2 178 13 1

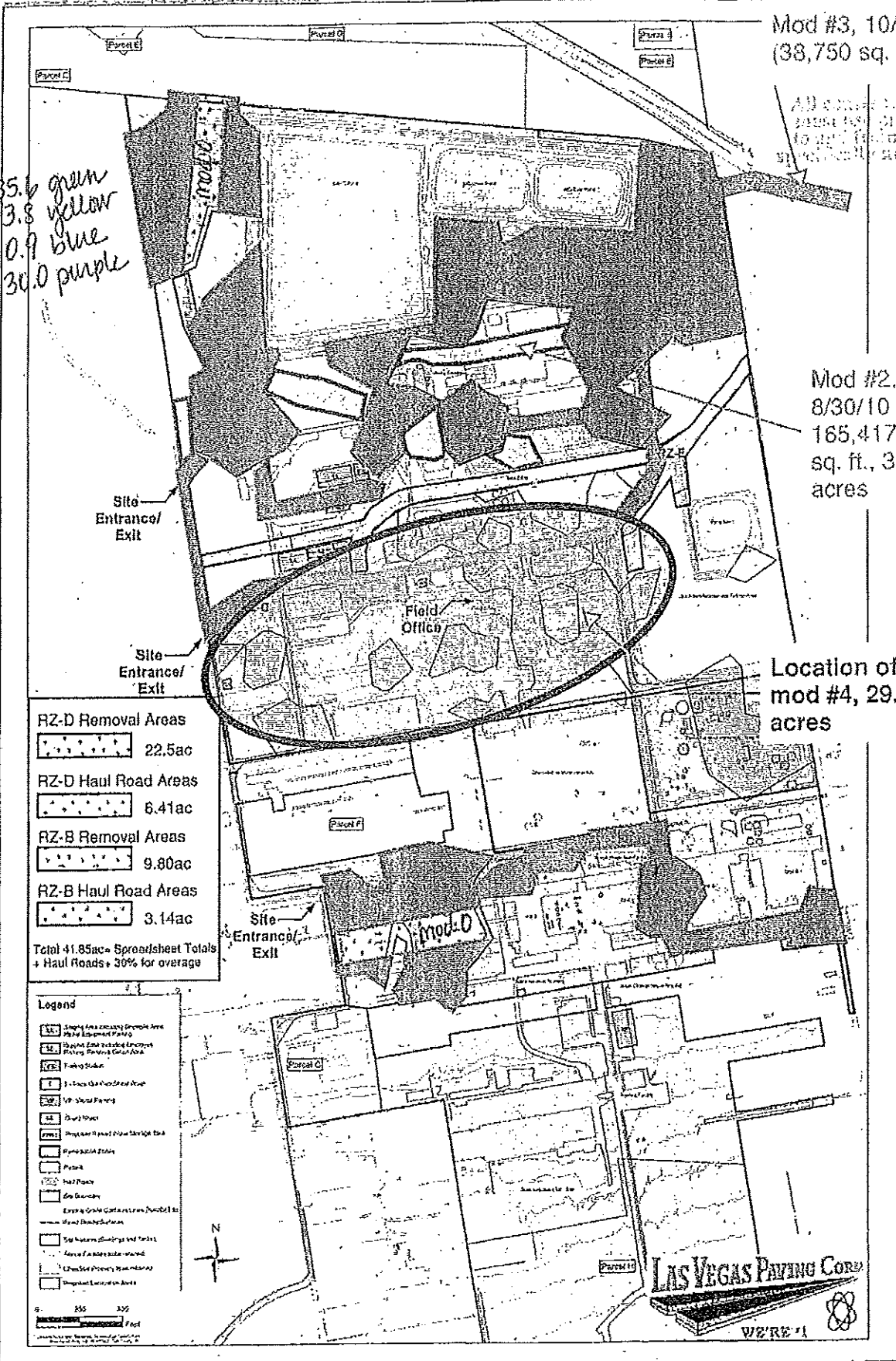
Mod #3, 10/25/10
(38,750 sq. ft.)

All areas shown on this map are subject to change without notice. See site plan for details.

mod 0 = 6.6
1 = add 35.6 green
2 = add 3.8 yellow
3 = add 0.9 blue
4 = add 30.0 purple

Mod #2,
8/30/10
165,417
sq. ft., 3.8
acres

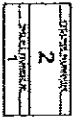
Location of
mod #4, 29.9
acres



RZ-D Removal Areas	22.5ac
RZ-D Haul Road Areas	6.41ac
RZ-B Removal Areas	9.80ac
RZ-B Haul Road Areas	3.14ac
Total 41.85ac = Spreadsheet Totals + Haul Roads + 30% for coverage	

- Legend**
- Storage Area including Storage Area
 - Storage Area including Employee Parking
 - Storage Area including Material Storage Area
 - Parking Station
 - 3' Deep Gas Piped Sewer Pipe
 - 18" Street Parking
 - Driveway
 - Proposed Road from Site to Site
 - Municipal Road
 - Pathway
 - Mail Boxes
 - Site Boundary
 - Existing Gravel Containment Area (Shaded)
 - Road Shoulder Surface
 - Site Access Driveways and Tents
 - Area of Access under Roadway
 - Unexcavated Property Boundaries
 - Proposed Location of Area

0 250 500
Feet



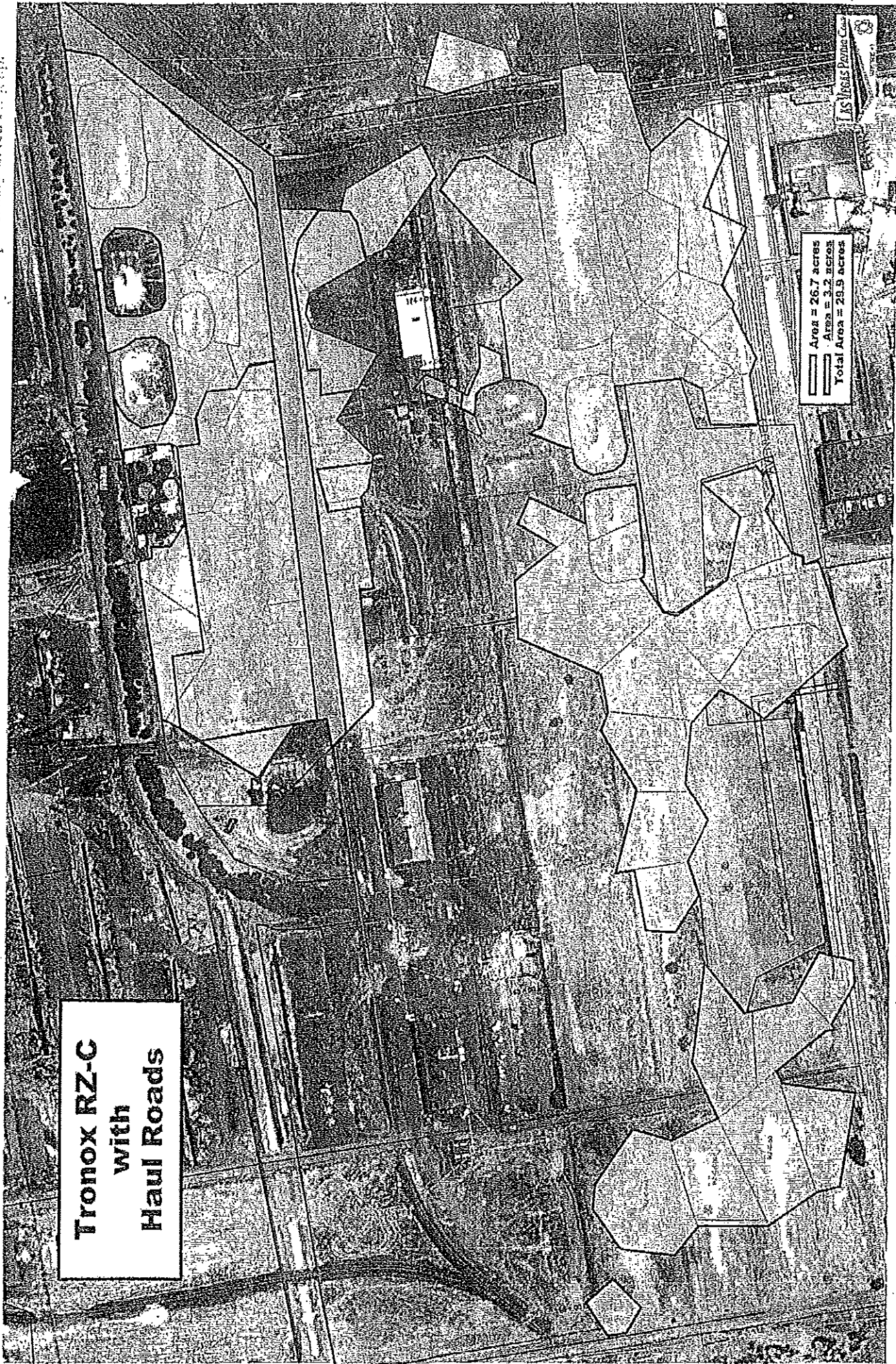
Mod #1 = addition of 35.6 acres, 8-17-10

northgate
Environmental Management, Inc.
TRONOX <http://www.ngem.com>

38851

mod 4

All areas with
must be prepared
to lead from the
specifically set out





Air Quality & Environmental Management

500 S. Grand Central Parkway, 1st floor
Las Vegas NV · 89155-1776
(702) 455-5942 · Fax (702) 383-9994



CLARK COUNTY · LAS VEGAS · NORTH LAS VEGAS · BOULDER CITY · HENDERSON · MESQUITE

DUST CONTROL PERMIT FOR CONSTRUCTION ACTIVITIES INCLUDING SURFACE GRADING AND TRENCHING

THIS PERMIT DOES NOT EXEMPT THE PERMITTEE FROM COMPLIANCE WITH THE ENDANGERED SPECIES ACT

Permit Number:

PAYMENT INFORMATION:

20103616

38851

Mod: 5

Fee: **\$31.20**

Balance Due: \$

Permittee and Project Information

Permittee: **Las Vegas Paving Corporation**

Permittee Address: **4420 South Decatur Blvd**

City, State, Zip: **Las Vegas NV 89103**

Fax No.: **7022579436**

Project Name: **Asbestos Abatement**

Project Address: **560 West Lake Mead Pkwy**

Located In: **Township: 22 Range: 62 Section: 12 EO Area: SE**

Acreage This Mod: **0** Total Acreage: **76.9**

Cross Streets: **E of US-95**

Project Contact(s)

Normal Hours: **Troy Hildreth**

After Hours: **Troy Hildreth**

Company: **Las Vegas Paving Corporation**

Company: **Las Vegas Paving Corp**

Phone: **(702)510-1278**

Phone: **(702)510-1278**

Issue Date: **22-Nov-2010**

Expiration Date:

05-Aug-2011

Effective Date: _____

Notes

Add DEMO ONLY

- Request Of Sign Waiver
- Public Works Agreement
- Closure Plan
- Conditional Renewal

DUST CONTROL MEASURES MUST OCCUR 24 HOURS A DAY, 7 DAYS A WEEK

THIS PERMIT IS NOT VALID UNTIL ALL FEES ARE PAID IN FULL AND A COMPLETE COPY IS ON THE PROJECT SITE, INCLUDING CONDITIONS OF PERMIT AND DUST MITIGATION PLAN

It is a condition of the issuance of any operating permit required by the commission or pursuant to any local ordinance for the control of air pollution that the holder of the operating permit agrees to permit inspection of the premises to which the permit relates by any authorized officer of the department at any time during the holder's hours of operation without prior notice. This condition must be stated on each application form and operating permit. NRS 445B.580.

The issuance of this PERMIT does not relieve the PERMITTEE from compliance with all other applicable federal, state, county and local ordinances and regulations. Issuance of this PERMIT shall not be a defense to violations of any applicable ordinances or regulations.



DAQEM

DEPARTMENT OF AIR QUALITY & ENVIRONMENTAL MANAGEMENT

DAQEM Use Only

RECEIVED
CC-DAQEM

2010 NOV 19 A 9:00

APPLICATION FOR DUST CONTROL PERMIT MODIFICATION

Submit applicable fee per Section 18 of the Air Quality Regulations

1. PERMIT INFORMATION: Permit Number: 38851

Applicant/Permittee: Las Vegas Paving Corp.

Project Name: Asbestos Abatement

Email Address: thidreth@lasvegaspaving.com

2. IS MODIFICATION REQUESTED AS A RESULT OF A CAO? Yes No

3. INFORMATION TO BE MODIFIED:

Control Measures:

Attach Control Measure Selection Pages (DCP03) for all modifications.

Project Acreage:

Acreage to be added: _____ Acreage to be removed: _____

Attach a revised Assessor's Parcel Map showing the originally permitted area and the area to be added/removed.

Supplemental Forms:

Blasting Demolition VLP: List permit number and/or company name.

Attach Supplemental forms and Control Measure Selection Pages.

Other:

Attach modifications and/or current information.

By signing this application, submitter attests he/she has read and understood the existing Dust Control Permit and associated documents, and agrees to abide by all conditions and requirements of that permit.

4. SUBMITTED BY:

Troy Hildreth Signature Troy Hildreth Print Name

Las Vegas Paving Corp. Company Name/Title

702-251-5800 Phone Number 11-19-2010 Date

702-251-5800 Phone Number 11-19-2010 Date

5. APPROVED BY:

[Signature] DAQEM Permitting Approval 11-19-10 Date

[Signature] DAQEM Asbestos/Removal Approval 11-19-10 Date

MODIFICATIONS SUBMITTED ON THIS FORM DO NOT CHANGE THE EXPIRATION DATE OF THE PERMIT. ACREAGE ADDED WILL EXPIRE ON THE SAME DATE AS THE CURRENT PERMIT EXPIRATION.

DEMOLITION - Mechanical/Manual**BMP 09**

**YOU MUST SELECT AT LEAST ONE CONTROL MEASURE FOR EACH REQUIREMENT.
PLACE A CHECK IN THE BOX IN FRONT OF YOUR SELECTION.**

Requirement: For renovation or demolition of a structure, a Demolition Supplemental form (see Appendix A) must be filled out, submitted and approved by the Control Officer prior to commencing demolition.

Requirement: An asbestos survey must be conducted on any facility or structure that is subject to NESHAP requirements before demolition can commence.

Requirement: A complete Clark County NESHAP Notification form must be submitted to the DAQEM at least ten working days prior to demolition. The asbestos survey must be attached to this notification.

Requirement: Stabilize surface soils where support equipment and vehicles will operate.

- 09-1 Pre-water and maintain surface soils in a stabilized condition where support equipment and vehicles will operate.
- 09-2 Apply and maintain a dust palliative to surface soils where support equipment and vehicles will operate.
- 09-3 Area where support equipment and vehicles will operate is completely covered with paving or concrete.

Requirement: Stabilize demolition debris during handling.

- 09-4 Apply water to demolition debris during handling.

Requirement: Stabilize debris following demolition.

- 09-5 Apply water to stabilize demolition debris.
- 09-6 Apply a dust palliative to stabilize demolition debris.

Requirement: Stabilize surrounding area following demolition.

- 09-7 Apply water to stabilize surrounding area following demolition.
- 09-8 Apply and maintain a dust palliative to stabilize surrounding area following demolition.

See also: BMP 23: TRUCK LOADING.



CLARK COUNTY
DEPARTMENT OF AIR QUALITY &
ENVIRONMENTAL MANAGEMENT

500 S. Grand Central Pkwy. P.O. Box 551776, Las Vegas Nevada 89155-1776
Office (702) 455-5942 · Fax (702) 383-9994

DEMOLITION SUPPLEMENTAL

NESHAP notifications must be submitted with renovation/demolition applications regardless of age and/or size of the building.

Permit Number: 38851
(If known, otherwise to be completed by DAQEM)

1. PERMIT INFORMATION:

Applicant/Permittee: Las Vegas Paving Corp.
Project Name: Asbestos Abatement
Project Address/Location: 560 W. Lake Mead Las Vegas

2. DEMOLITION CONTRACTOR:

Company Name: Las Vegas Paving Responsible Person: Troy Hildreth
Address: 4420 S. Decatur
Phone #: (702) 251-5800 Cellular #: (702) 510-1278 FAX #: (702) 251-9436

3. DEMOLITION INFORMATION:

Describe demolition to take place: Two large water tanks and one 20'x30' block building
Size of building: 600 ft² Date of building construction: unknown
Total Number of buildings on site: 3 Number of buildings to be demolished: 3

4. BEFORE A DUST CONTROL PERMIT CAN BE ISSUED ON SITES REQUIRING AN ASBESTOS SURVEY, THE FOLLOWING IS REQUIRED:

- A. If Regulated Asbestos Containing Material (RACM) is present, a NESHAP notification must be submitted to DAQEM and an Asbestos Waste Certificate must be issued before the asbestos can be removed and disposed.
- B. Once the RACM has been abated, submit a final clearance letter from a certified asbestos consultant along with a copy of the license of the individual that cleared the site.
- C. Has Asbestos Waste Certificate been received from DAQEM?
No: Yes: , Certificate #: 10-43153-01

5. SUBMITTED BY:

Name: Troy Hildreth Title: Environmental
Company Name: Las Vegas Paving Corp.
Signature: [Handwritten Signature] Date: November 19, 2010



Air Quality & Environmental Management

500 S. Grand Central Parkway, 1st floor
Las Vegas NV · 89155-1776
(702) 455-5942 · Fax (702) 383-9994



CLARK COUNTY · LAS VEGAS · NORTH LAS VEGAS · BOULDER CITY · HENDERSON · MESQUITE

DUST CONTROL PERMIT FOR CONSTRUCTION ACTIVITIES INCLUDING SURFACE GRADING AND TRENCHING

THIS PERMIT DOES NOT EXEMPT THE PERMITTEE FROM COMPLIANCE WITH THE ENDANGERED SPECIES ACT

Permit Number: **38851** Mod: **6** PAYMENT INFORMATION: 20111759

Fee: **\$31.70**
Balance Due: \$

Permittee and Project Information

Permittee: **Las Vegas Paving Corporation**
Permittee Address: **4420 South Decatur Blvd**
City, State, Zip: **Las Vegas NV 89103** Fax No.: **7022579436**
Project Name: **Asbestos Abatement**
Project Address: **560 West Lake Mead Pkwy**
Located In: Township: **22** Range: **62** Section: **12** EO Area: **SE**
Acreage This Mod: **0** Total Acreage: **76.9**
Cross Streets: **E of US-95**

*J-11649
IT-2104*

Project Contact(s)

Normal Hours: **Troy Hildreth** After Hours: **Troy Hildreth**
Company: **Las Vegas Paving Corporation** Company: **Las Vegas Paving Corp**
Phone: **(702)510-1278** Phone: **(702)510-1278**

Issue Date: **14-Jun-2011** Expiration Date: **10-Aug-2011**

Effective Date: _____

- Request Of Sign Waiver
- Public Works Agreement
- Closure Plan
- Conditional Renewal

Notes

Additional demo

DUST CONTROL MEASURES MUST OCCUR 24 HOURS A DAY, 7 DAYS A WEEK

THIS PERMIT IS NOT VALID UNTIL ALL FEES ARE PAID IN FULL AND A COMPLETE COPY IS ON THE PROJECT SITE, INCLUDING CONDITIONS OF PERMIT AND DUST MITIGATION PLAN

It is a condition of the issuance of any operating permit required by the commission or pursuant to any local ordinance for the control of air pollution that the holder of the operating permit agrees to permit inspection of the premises to which the permit relates by any authorized officer of the department at any time during the holder's hours of operation without prior notice. This condition must be stated on each application form and operating permit. NRS 445B.580.

The issuance of this PERMIT does not relieve the PERMITTEE from compliance with all other applicable federal, state, county and local ordinances and regulations. Issuance of this PERMIT shall not be a defense to violations of any applicable ordinances or regulations.



DAQEM

DEPARTMENT OF AIR QUALITY & ENVIRONMENTAL MANAGEMENT

RECEIVED
CC-DAQEM

2011 JUN - 8 A 9:07

APPLICATION FOR DUST CONTROL PERMIT MODIFICATION

Submit applicable fee per Section 18 of the Air Quality Regulations

1. PERMIT INFORMATION: Permit Number: 38851

Applicant/Permittee: Las Vegas Paving Corp.

Project Name: Asbestos Abatement

Email Address: thildreth@lasvegaspaving.com

2. IS MODIFICATION REQUESTED AS A RESULT OF A CAO? Yes No

3. INFORMATION TO BE MODIFIED:

Control Measures:

Attach Control Measure Selection Pages (DCP03) for all modifications.

Project Acreage:

Acreage to be added: _____ Acreage to be removed: _____
Attach a revised Assessor's Parcel Map showing the originally permitted area and the area to be added/removed.

Supplemental Forms:

Blasting Demolition VLP: List permit number and/or company name.
Attach Supplemental forms and Control Measure Selection Pages.

Other: additional demo

Attach modifications and/or current information.

By signing this application, submitter attests he/she has read and understood the existing Dust Control Permit and associated documents, and agrees to abide by all conditions and requirements of that permit.

4. SUBMITTED BY:

Troy Hildreth
Print Name

Signature
Las Vegas Paving Corp.

Company Name/Title
7022515800
Phone Number

06-07-2011
Date

5. APPROVED BY:

DAQEM Permitting Approval

6-9-11
Date

DAQEM Asbestos/Removal Approval

6-14-11
Date

MODIFICATIONS SUBMITTED ON THIS FORM DO NOT CHANGE THE EXPIRATION DATE OF THE PERMIT. ACREAGE ADDED WILL EXPIRE ON THE SAME DATE AS THE CURRENT PERMIT EXPIRATION.



Air Quality & Environmental Management

500 S. Grand Central Parkway, 1st floor
Las Vegas NV · 89155-1776
(702) 455-5942 · Fax (702) 383-9994



CLARK COUNTY · LAS VEGAS · NORTH LAS VEGAS · BOULDER CITY · HENDERSON · MESQUITE

DUST CONTROL PERMIT FOR CONSTRUCTION ACTIVITIES INCLUDING SURFACE GRADING AND TRENCHING

THIS PERMIT DOES NOT EXEMPT THE PERMITTEE FROM COMPLIANCE WITH THE ENDANGERED SPECIES ACT

Permit Number:

PAYMENT INFORMATION:

20112333

38851

Mod: 7

Fee: \$10,780.00

Balance Due: \$

Permittee and Project Information

Permittee: Las Vegas Paving Corporation

Permittee Address: 4420 South Decatur Blvd

City, State, Zip: Las Vegas NV 89103

Fax No.: 7022579436

Project Name: Asbestos Abatement

Project Address: 560 West Lake Mead Pkwy

Located In: Township: 22 Range: 62 Section: 12 EO Area: SE

Acreage This Mod: 76.9 Total Acreage: 76.9

Cross Streets: E of US-95

Project Contact(s)

Normal Hours: Troy Hildreth

After Hours: Troy Hildreth

Company: Las Vegas Paving Corporation

Company: Las Vegas Paving Corp

Phone: (702)510-1278

Phone: (702)510-1278

Issue Date: 11-Aug-2011

Expiration Date:

10-Aug-2012

Effective Date: _____

- Request Of Sign Waiver
- Public Works Agreement
- Closure Plan
- Conditional Renewal

Notes

RENEWAL

DUST CONTROL MEASURES MUST OCCUR 24 HOURS A DAY, 7 DAYS A WEEK

THIS PERMIT IS NOT VALID UNTIL ALL FEES ARE PAID IN FULL AND A COMPLETE COPY IS ON THE PROJECT SITE, INCLUDING CONDITIONS OF PERMIT AND DUST MITIGATION PLAN

It is a condition of the issuance of any operating permit required by the commission or pursuant to any local ordinance for the control of air pollution that the holder of the operating permit agrees to permit inspection of the premises to which the permit relates by any authorized officer of the department at any time during the holder's hours of operation without prior notice. This condition must be stated on each application form and operating permit. NRS 445B.580.

The issuance of this PERMIT does not relieve the PERMITTEE from compliance with all other applicable federal, state, county and local ordinances and regulations. Issuance of this PERMIT shall not be a defense to violations of any applicable ordinances or regulations.



DAQEM

DEPARTMENT OF AIR QUALITY & ENVIRONMENTAL MANAGEMENT

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2011 AUG -4 A 9:35

DUST CONTROL PERMIT RENEWAL FORM

1. PERMIT INFORMATION:

Permit Number: 38851
 Permittee Name: Las Vegas Paving Corp.
 Project Name: Asbestos Abatement
 E-Mail Address: thildreth@lasvegaspaving.com

Currently permitted acreage: 76.9 Acreage to be renewed: 76.9

If renewal acreage is being modified from current acreage; attach revised map(s) showing total area to be included in renewed permit. $6.6 + 35.6 \pmod{1} + 3.8 \pmod{2} +$

2. CONTACT INFORMATION – On-site Person:

Name: Troy Hildreth Company: Las Vegas Paving Corp.

Phone: (702) 510-1278 Dust Card Number: dm0205007 Exp. date: 2/23/14

(Check any additional contacts to be modified or changed, list on separate page)

Responsible Contact Dust Control Monitor (use form DCP 09)

3. INFORMATION TO BE CHANGED/MODIFIED:

Control Measures:

Attach updated Project Activities Checklist (DCP 02). If adding Project Activities to current permit, include Control Measure Selection Pages (DCP 03) for each addition.

Supplemental Forms:

Blasting Demolition Other

Attach modified and/or current forms if renewal includes Blasting and/or Demolition, for all other forms attach only if there is a change from current approved permit.

PAYMENT INFORMATION TO BE COMPLETED BY THE APPLICANT	
PAYING BY (Please Print)	
<input type="checkbox"/> CASH	
<input checked="" type="checkbox"/> CHECK CHECK # <u>275564</u>	
NAME AND ADDRESS AS IT APPEARS ON CHECK:	
<u>Las Vegas Paving Corp.</u>	
<u>4420 S. Decatur Blvd.</u>	
<u>Las Vegas, NV 89103</u>	
Telephone #: <u>(702) 251-5800</u>	
<input type="checkbox"/> CREDIT CARD LAST FOUR DIGITS OF CREDIT CARD NUMBER: _____	
EXACT NAME AS IT APPEARS ON CREDIT CARD: _____	

By signing this permit application I certify that:

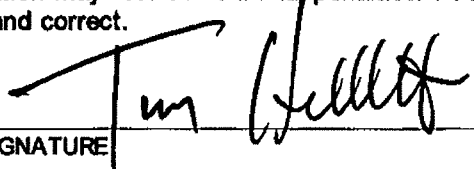
- A. I am authorized, on behalf of the individual or company listed in Section 1, as Applicant/Permittee, to apply for their Dust Control Permit and to commit to all of the terms and conditions of the requested permit.
- B. Construction activities will be limited to lands that the applicant/permittee either owns or is authorized to use for construction activities. The permit issued subsequent to this application is not a substitute for obtaining the property owners permission to use his land. Issuance of a Dust Control Permit is intended only for the purpose of controlling emissions of air pollutants and assuring compliance with Air Quality Regulations. The applicant/permittee agrees to hold harmless, indemnify, and defend Clark County, its employees and assigns from any claims that may arise due to any unauthorized use of land for construction activities.
- C. The permittee accepts responsibility for assuring that all contractors, subcontractors, and all other persons on the construction site covered by this permit, comply with the terms and conditions of the permit, the dust mitigation plan and all applicable Air Quality Regulations.
- D. The applicant/permittee understands that it is a condition of the permit that the permittee agrees to allow the inspection of the site for compliance with the terms and conditions of the permit and Air Quality Regulations at any time during the permittee's hours of operation by a DAQEM officer without prior notice or at any time pursuant to the investigation of a complaint or upon direct observation of emission and/or failure to maintain Best Management Practices.
- E. I understand that any material misrepresentation made in this application may invalidate the permit and that Clark County may pursue enforcement action against me. In addition, I understand any willful misrepresentation may result in criminal penalties. I declare under penalty of perjury that the foregoing is true and correct.

Executed on:

08-02-2011

DATE

SIGNATURE



Troy Hildreth

PRINTED NAME

Environmental

TITLE AND COMPANY NAME

FOR DAQEM USE ONLY

DATE PAID <u>8/4/11</u>	RECEIVED BY <u>MK</u>	POS # <u>20118333</u>
ISSUE DATE <u>8/11/2011</u>	ISSUED BY <u>JOS</u>	
DAQEM REVIEW: <u>[Signature]</u>	DATE <u>8-10-11</u>	
BLASTING APPROVAL (if applicable): _____	DATE _____	
DEMOLITION APPROVAL (if applicable): _____	DATE _____	
COMPLIANCE AREA ASSIGNMENT: <u>SE</u>	Hydrographic Area: <u>212</u>	
<input type="checkbox"/> Highway Construction <input checked="" type="checkbox"/> All Other <u>misc.</u>		

38851

22 62 12

198 12 2 198 13 1

mod 0 = 6.6
 1 = add 35.6 green
 2 = add 3.8 yellow
 3 = add 0.9 blue
 4 = add 30.0 purple
 5 = add demo
 6 = additional demo
 7 = renew @ 76.9

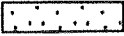
Mod #3, 10.25.10
 (38,750 sq. ft.)

All entrances/exits traffic must follow the access to the site, unless specifically noted on map.

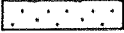
Mod #2
 8:30.10
 165,417
 sq. ft. 3.8
 acres

Location of
 mod #4, 29.9
 acres

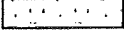
RZ-D Removal Areas

 22.5ac

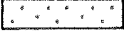
RZ-D Haul Road Areas

 6.41ac

RZ-B Removal Areas


 9.80ac

RZ-B Haul Road Areas

 3.14ac

Total 41.85ac = Spreadsheet Totals
 + Haul Roads + 30% for overage

Legend

-  SA Storage Area including On-site Area (Heavy Equipment Parking)
-  SZ Support Zone including Fire Lane (Heavy Equipment Area)
-  TR Trailing Trailer
-  T Truck and Tractor Area
-  VF Vehicle Parking
-  CA Work Space
-  EM Equipment Storage Area (Heavy Equipment)
-  E Enclosed Area
-  P Paved Area
-  U Unpaved Area
-  E Existing and Proposed (New Structure) Construction Footprints
-  C Construction Material and Debris Storage Area (Mobile Storage)
-  I Impervious Surface Area
-  P Proposed Construction Area

0 50 100
 Feet

STATION 11785
 2
 STATION 11786

Mod #1 10.25.10 35.6 acres



SE



DAQEM

DEPARTMENT OF AIR QUALITY & ENVIRONMENTAL MANAGEMENT

RECEIVED
CC-DAQM

PERMIT CLOSURE CERTIFICATE OF PROJECT COMPLETION

2011 NOV -4 A 11: 38

Submit completed form to DAQEM or FAX to (702) 383-9994

1. PERMIT INFORMATION:

Permit Number: 38851 *M-7* Project Name: Asbestos Abatement
Applicant/Permittee: Las Vegas Paving Corp.
Project Address/Location: 560 W. Lake Mead Pkwy. Tronox Facility

2. CLOSURE INFORMATION:

Permittee Statement

By submitting this form I verify no further soil disturbing construction activities will occur at the above referenced location. All project soils designated in the Dust Control Permit have been permanently stabilized by the following method(s) (Check all that apply):

- Permitted area built out - no disturbed soil areas remain.
- Ground cover and/or dust palliative have been applied to areas not built out.
- Less than a 1/4 acre of disturbed soil remains.
- An application for a new Dust Control Permit has been submitted, for remaining disturbed areas.

I further verify I have inspected the site for the following items, with the results indicated:

- Unpaved roads or easements are remaining on or accessing the permitted site. Yes No
- Unpaved areas remain on the site that could be used for parking or storage lots. Yes No

Print Name: Troy Hildreth 510-1278 Date: 11-04-2011

Send me this form upon completion of inspection. Yes No;

If yes FAX #: 257-9436 or Email address thildreth@lasvegaspaving.com

DAQEM use only

Inspection Results

Are any unpaved roads, easements or parking/storage lots on the permitted site? Yes No

An inspection by a DAQEM Enforcement Officer has been performed with the following results:

- Construction is complete and the site has been built out or stabilized with landscaping. (PASS)
- Construction has ceased and all areas that are not built out have been adequately treated for long-term stabilization. (PASS)
- Construction has ceased, but certain areas of the site (specify in 'Notes') have not been adequately treated for long-term stabilization. (FAIL)
- Construction has ceased, but the entire site has not been adequately treated for long-term stabilization. (FAIL)
- Construction has not ceased, but site has less than 1/4 acre of disturbed area remaining.
- This permit replaced with permit(s). # _____
- This site will require an ATC/OP. (list equipment in 'Notes')

Notes: Project complete. Any further work will require another permit.

Enforcement Officer: *[Signature]* Date: 11/9/11

Rev by JB

BRIAN SANDOVAL
Governor

STATE OF NEVADA

DONALD E. JAYNE
Administrator

TERRY JOHNSON
Director



STEVE COFFIELD
Chief Administrative
Officer

(702) 486-9020

Fax: (702) 990-0360

DEPARTMENT OF BUSINESS AND INDUSTRY
DIVISION OF SAFETY AND HEALTH RELATIONS
OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION
1301 N Green Valley Pkwy, Suite 200
Henderson, Nevada 89074

ACCEPTANCE OF ASBESTOS ABATEMENT PROJECT

**PLEASE USE THE PROJECT NUMBER ASSIGNED BELOW ON ANY REVISIONS
OR CORRESPONDENCE CONCERNING THIS PROJECT**

Date Notification Form Received by Section: Jan 04 2010

Revision Date: Jan 05 2011 Revision No: _____

By Whom: _____ PROJECT NO: 2011-13

Owner: Tronox Kerr McGee Chemical

Contractor: Greenway Industries

Location of Project: Tronox Kerr McGee Chemical

560 W Lake Mead Parkway Henderson, NV 89015

Start Date: Jan 05 2011 Finish Date: Dec 31 2011

Amount of ACM: 9000 Sqft 0 lin.ft

Is this an emergency project?

Is this a telephone-amended notification?

Accepted By: *Steve Tomerick* Date: Jan 05 2011

We are working to make your job safer!



DEPARTMENT OF AIR QUALITY & ENVIRONMENTAL MANAGEMENT

500 S Grand Central Parkway 1st Floor · Box 555210 · Las Vegas, NV 89155-5210
(702) 455-5942 · Fax (702) 383-9994

Lewis Wallenmeyer Director · Tina Gingras Assistant Director

December 22, 2010

Greenway Industries
7330 Eastgate Road #140
Henderson, NV 89011

Project Number: 100633

On December 17, 2010 you submitted a project notification in accordance with the provisions of Air Quality Regulation Section 13, which adopts by reference 40 CFR Part 61.145. DAQEM has reviewed the notification and considers it to be complete.

In the notification, you reported your company will be removing soil with TSI, Asbestos Packing and other Unknown Materials of which 243000 cubic feet contains regulated asbestos containing material at Tronox, 560 West Lake Mead, Beta Ditch, North of the Control Lab, Henderson, NV, 89015. Your request for a waiver of the 10 working day requirement has been denied. The projected start date is January 4, 2011 with a completion date of February 28, 2011.

If there are any changes to the start date, contact DAQEM immediately, prior to the actual start date. If any of the information on the notification form changes, send in a revised notification. All revised notifications must be mailed or hand delivered to our office. Every revised notification must have an original "wet" signature. Revised notifications that are faxed and emailed will not be accepted. Use the project number listed above for all modifications and whenever referring to this project.

If you have any questions, please contact me.

Larry M Parks
Air Quality Specialist
Department of Air Quality and Environmental Management
702-249-2268

BOARD OF COUNTY COMMISSIONERS

Rory Reid Chairman · Susan Brager Vice-Chairman
Lorry Brown, Tom Collins, Chris Giunchigliani, Steve Sisolak, Lawrence Weekly
Virginia Valentine, PE, County Manager



SOUTHERN NEVADA HEALTH DISTRICT
Permit to Transport Asbestos
AUTHORITY: Nevada Administrative Code 444.965-444.976

Permit Number:
ATP10-112302
Expires 1/7/11

1. Waste Asbestos Generator:

Greenway Industries
7330 Eastgate Rd., #140
Henderson, NV 89011
NV Contractor License No. (Type): 0074376, A23
Contact Name: Todd Osmundson
Telephone No. 702-869-4000

2. Waste Asbestos Generation Site:

Tronox
560 W. Lake Mead Pkwy
Henderson, NV 89015
Contact Name: Susan Crowley
Telephone No. -

3. Transporter:

Republic Services
700 E. Sahara Ave.
Las Vegas, NV 89104
NVDOT No.: 364313
License No.:
Contact Name: Rob Tidwell
Telephone No.: 702-599-5907

4. Waste Disposal/Temporary Storage Site:

Apex Landfill
Operated by: Republic Services
13550 N. Hwy 93
Las Vegas, NV 89165
Contact Name: Rob Tidwell
Telephone No.: 702-423-2128

5. Projected Start and Completion Dates:

Start Date: November 22, 2010

Completion Date: December 31, 2010

6. Description(s) of Waste Asbestos for Removal and Disposal:

4" steel pipe with asbestos wrap, 20" transite pipe (2000 LF)

7. Limitations and Conditions:

- This Permit is valid only for above described waste asbestos generated at the site during the dates specified above, as amended and/or extended by the Southern Nevada Health District.
- The generator, and all subcontractors, must operate in accordance with the compliance procedure submitted pursuant to NAC 444.972 as approved and/or amended by the Southern Nevada Health District.
- As required, a Notification of Demolition and Renovation for Asbestos Removal, must be submitted to the Clark County Department of Air Quality and Environmental Management.
- The dates stipulated in Section 5 and the description(s) in Section 6 may be amended by, and at the sole discretion of, the Southern Nevada Health District. Application for such must be made before the ending of the Completion Date above. In no case shall more than two extensions of the start/completion dates be granted.
- This Permit is granted based on the information provided in the application submitted in accordance with NAC 444.965 through 976, and any supplements approved by the Solid Waste Management Authority, and may be modified by the District if the statutes or regulations upon which the approval is based change, or if a modification is otherwise necessary in the interest of public health and safety, and the environment. Any discrepancies between information contained in the application and the actual operation of the transporter may be grounds for immediate revocation of this Permit and/or appropriate enforcement action. The waste asbestos generator must inform the Southern Nevada Health District of any circumstance(s) which may affect their, or any of their subcontractors', ability to comply with the requirements of this Permit, applicable regulations, or other legal requirements.-

Signature:

Name and Title:

Eddie L. Ridenour, REHS, CEM
Environmental Health Supervisor

Date:

11-23-10



SOUTHERN NEVADA HEALTH DISTRICT
Permit to Transport Asbestos
AUTHORITY: Nevada Administrative Code 444.965-444.976

Permit Number:
ATP10-122001
Expires 3/7/11

1. Waste Asbestos Generator:

Greenway Industries
7330 Eastgate Rd., #140
Henderson, NV 89011
NV Contractor License No. (Type): 0074376, A23
Contact Name: Todd Osmundson
Telephone No. 702-869-4000

2. Waste Asbestos Generation Site:

Tronox
560 W. Lake Mead Pkwy.
Henderson, NV 89015
Contact Name: Susan Crowley
Telephone No. -

3. Transporter:

Republic Services
700 E. Sahara Ave.
Las Vegas, NV 89104
NVDOT No.: 364313
License No.:
Contact Name: Rob Tidwell
Telephone No.: 702-599-8907

4. Waste Disposal/Temporary Storage Site:

Apex Landfill
Operated by: Republic Services
13560 N. Hwy 93
Las Vegas, NV 89165
Contact Name: Rob Tidwell
Telephone No.: 702-423-2128

5. Projected Start and Completion Dates:

Start Date: December 20, 2010

Completion Date: February 28, 2011

6. Description(s) of Waste Asbestos for Removal and Disposal:

Transite piping, asbestos wrapped steel piping (4,000 LF)

7. Limitations and Conditions:

- a. This Permit is valid only for above described waste asbestos generated at the site during the dates specified above, as amended and/or extended by the Southern Nevada Health District.
- b. The generator, and all subcontractors, must operate in accordance with the compliance procedure submitted pursuant to NAC 444.972 as approved and/or amended by the Southern Nevada Health District.
- c. As required, a Notification of Demolition and Renovation for Asbestos Removal, must be submitted to the Clark County Department of Air Quality and Environmental Management.
- d. The dates stipulated in Section 5 and the description(s) in Section 6 may be amended by, and at the sole discretion of, the Southern Nevada Health District. Application for such must be made before the ending of the Completion Date above. In no case shall more than two extensions of the start/completion dates be granted.
- e. This Permit is granted based on the information provided in the application submitted in accordance with NAC 444.965 through 976, and any supplements approved by the Solid Waste Management Authority, and may be modified by the District if the statutes or regulations upon which the approval is based change, or if a modification is otherwise necessary in the interest of public health and safety, and the environment. Any discrepancies between information contained in the application and the actual operation of the transporter may be grounds for immediate revocation of this Permit and/or appropriate enforcement action. The waste asbestos generator must inform the Southern Nevada Health District of any circumstance(s) which may affect their, or any of their subcontractors', ability to comply with the requirements of this Permit, applicable regulations, or other legal requirements.-

Signature:

Name and Title:

Eddie L. Ridenour, REHS, CEM
Environmental Health Supervisor

Date:

12-21-10



SOUTHERN NEVADA HEALTH DISTRICT
Permit to Transport Asbestos

AUTHORITY: Nevada Administrative Code 444.965-444.976

Permit Number:

ATP11-050405

Expires 9/7/11

1. Waste Asbestos Generator:

Greenway Industries
6051 E. Clark St.
Las Vegas, NV 89122
NV Contractor License No. (Type): 0074376, A23
Contact Name: Todd Osmundson
Telephone No. 702-869-4000

2. Waste Asbestos Generation Site:

Tronox
8000 W. Lake Mead
Henderson, NV 89015
Contact Name: John Pekala
Telephone No. 602-734-7710

3. Transporter:

Las Vegas Paving
4420 S. Decatur
Las Vegas, NV 89103
NVDOT No.: 191949
License No.:
Contact Name: Dave Breault
Telephone No.: 702-353-4355

4. Waste Disposal/Temporary Storage Site:

Apex Landfill
Operated by: Republic Services
13550 N. Hwy 93
Las Vegas, NV 89165
Contact Name: Rob Tidwell
Telephone No.: 702-423-2128

5. Projected Start and Completion Dates:

Start Date: May 2, 2011

Completion Date: September 1, 2011

6. Description(s) of Waste Asbestos for Removal and Disposal:

ACM pipe wrap and ACM contaminated soil (1000 LF and 15,000 CF), transite pipe (5 LF)

7. Limitations and Conditions:

- a. This Permit is valid only for above described waste asbestos generated at the site during the dates specified above, as amended and/or extended by the Southern Nevada Health District.
- b. The generator, and all subcontractors, must operate in accordance with the compliance procedure submitted pursuant to NAC 444.972 as approved and/or amended by the Southern Nevada Health District.
- c. As required, a Notification of Demolition and Renovation for Asbestos Removal, must be submitted to the Clark County Department of Air Quality and Environmental Management.
- d. The dates stipulated in Section 5 and the description(s) in Section 6 may be amended by, and at the sole discretion of, the Southern Nevada Health District. Application for such must be made before the ending of the Completion Date above. In no case shall more than two extensions of the start/completion dates be granted.
- e. This Permit is granted based on the information provided in the application submitted in accordance with NAC 444.965 through 976, and any supplements approved by the Solid Waste Management Authority, and may be modified by the District if the statutes or regulations upon which the approval is based change, or if a modification is otherwise necessary in the interest of public health and safety, and the environment. Any discrepancies between information contained in the application and the actual operation of the transporter may be grounds for immediate revocation of this Permit and/or appropriate enforcement action. The waste asbestos generator must inform the Southern Nevada Health District of any circumstance(s) which may affect their, or any of their subcontractors', ability to comply with the requirements of this Permit, applicable regulations, or other legal requirements.-

Signature:

Name and Title:

Eddie L. Ridenour, REHS, CEM
Environmental Health Supervisor

Date:

8-16-11



SOUTHERN NEVADA HEALTH DISTRICT
Permit to Transport Asbestos
AUTHORITY: Nevada Administrative Code 444.965-444.976

Permit Number:
ATP11-050405
Expires 11/15/11

1. Waste Asbestos Generator:

Greenway Industries
6051 E. Clark St.
Las Vegas, NV 89122
NV Contractor License No. (Type): 0074376, A23
Contact Name: Todd Osmundson
Telephone No. 702-869-4000

2. Waste Asbestos Generation Site:

Tronox
8000 W. Lake Mead
Henderson, NV 89015
Contact Name: John Pekala
Telephone No. 602-734-7710

3. Transporter:

Las Vegas Paving
4420 S. Decatur
Las Vegas, NV 89103
NVDOT No.: 191949
License No.:
Contact Name: Dave Breault
Telephone No.: 702-353-4355

4. Waste Disposal/Temporary Storage Site:

Apex Landfill
Operated by: Republic Services
13550 N. Hwy 93
Las Vegas, NV 89165
Contact Name: Rob Tidwell
Telephone No.: 702-423-2128

5. Projected Start and Completion Dates:

Start Date: May 2, 2011

Completion Date: September 1, 2011

6. Description(s) of Waste Asbestos for Removal and Disposal:

ACM pipe wrap and ACM contaminated soil (1000 LF and 15,000 CF), transite pipe (5 LF)

7. Limitations and Conditions:

- This Permit is valid only for above described waste asbestos generated at the site during the dates specified above, as amended and/or extended by the Southern Nevada Health District.
- The generator, and all subcontractors, must operate in accordance with the compliance procedure submitted pursuant to NAC 444.972 as approved and/or amended by the Southern Nevada Health District.
- As required, a Notification of Demolition and Renovation for Asbestos Removal, must be submitted to the Clark County Department of Air Quality and Environmental Management.
- The dates stipulated in Section 5 and the description(s) in Section 6 may be amended by, and at the sole discretion of, the Southern Nevada Health District. Application for such must be made before the ending of the Completion Date above. In no case shall more than two extensions of the start/completion dates be granted.
- This Permit is granted based on the information provided in the application submitted in accordance with NAC 444.965 through 976, and any supplements approved by the Solid Waste Management Authority, and may be modified by the District if the statutes or regulations upon which the approval is based change, or if a modification is otherwise necessary in the interest of public health and safety, and the environment. Any discrepancies between information contained in the application and the actual operation of the transporter may be grounds for immediate revocation of this Permit and/or appropriate enforcement action. The waste asbestos generator must inform the Southern Nevada Health District of any circumstance(s) which may affect their, or any of their subcontractors', ability to comply with the requirements of this Permit, applicable regulations, or other legal requirements.-

Signature:

Name and Title:

Eddie L. Ridenour, REHS, CEM
Environmental Health Supervisor

Date:

10-31-11

Re: Stormwater General Permit NVR100000
Confirmation Number: CSW- 16054
Project Name: Tronox Remediation Project
Date: 3/11/2010

Owner
Tronox LLC
Mr. Derrick Willis
300 Frank H. Ogawa Plaza
#510
Oakland, CA 94612-_____

Operator
Las Vegas Paving Corp.
Mr. Troy Hildreth
4420 S. Decatur Blvd.
Las Vegas, NV 89103-

Renewal: No * If this is a Renewal Application, NO filing fee is required.

Submission of this Electronic Notice of Intent constitutes notice that the Permittee identified in this request intends to be authorized by a National Pollutant Discharge Elimination System (NPDES) permit issued for storm water discharges in the State of Nevada and has or will comply with the following:

1. The Permittee will comply with all applicable permit conditions,
2. The Permittee understands that implementation of the Storm Water Pollution Prevention Plan, which is required under by the General Permit will begin at the time the permittee commences work on the project identified in Section I of this application,
3. The Permittee understands that failure to submit the required \$200.00 fee and this signed Section Certification within 30 days of the electronic submittal will result in failure for eligible coverage under the General Permit; and,
4. That Nevada Administrative Code (NAC) 445A.268 Section (5)(b) reads, in part, that a Permittee (discharger) who is covered under a general permit shall pay to the Director a nonrefundable fee of \$200 not later than July 1 of each year that the discharger is covered under that permit.
5. To Terminate coverage of the Nevada NPDES General Permit for Stormwater Discharges, the Permittee must submit a Notice of Termination ("NOT") form when their facilities no longer have any stormwater discharges associated with Construction activity as defined in the Nevada's General Stormwater Permit or EPA regulations at 40 CFR 122.26, or when they are no longer the operator of the site.

For Construction sites, elimination of all stormwater discharges associated with construction activity occurs when disturbed soils at the construction site have been finally stabilized and temporary erosion and sediment control measures have been removed or will be removed at an appropriate time. Final stabilization means that all soil-disturbing activities at the site have been completed, and that a uniform perennial vegetative cover with a density of 70% of the native cover for unpaved areas and areas not covered by permanent structures has been established, or equivalent permanent stabilization measures (such as the use of riprap, gabions, or geo-textiles) have been employed.

Please mail the filing fee of \$200.00 along with this notice to:

Stormwater Coordinator 3173
Bureau of Water Pollution Control
Nevada Division of Environmental Protection
901 South Stewart Street, Suite 4001
Carson City, NV 89701-5249

Should you have any questions, please call Bonnie Hartley at (775) 687-9430.

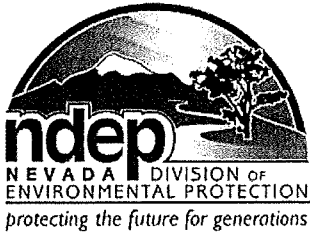
NOI Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. I also confirm that a storm water pollution prevention plan (SWPPP) has been completed, will be maintained at the project site from the start of construction activities, and that the SWPPP will be compliant with any applicable local sediment and erosion control plans. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines for knowing violations.

Owner or Operator Name (Please Print): _____

Signature (Please use a Non-Black Ink Color): _____

March 6, 2009



STATE OF NEVADA

Department of Conservation & Natural Resources

Jim Gibbons, Governor

Allen Biaggi, Director

DIVISION OF ENVIRONMENTAL PROTECTION

Leo M. Drozdoff, P.E., Administrator

Notice of Termination ("NOT") of Coverage under the National Pollutant Discharge Elimination System (NPDES) Permit Issued for Stormwater Discharges Associated with Mining, Industrial or Construction Activity

Submission of this NOT constitutes notice that the operator identified below is no longer authorized to discharge stormwater associated with Mining, Industrial, or Construction activity under the NPDES program. This form and other information are available at: <http://www.state.nv.us/ndep/bwpc/storm01.htm>.

Any questions concerning this form should be directed to the address below or to:
Bonnie Hartley at (775) 687-9430 bhartley@ndep.nv.gov.

Submit the completed form to:
Stormwater Coordinator 3173
Nevada Division of Environmental Protection
Bureau of Water Pollution Control
901 S. Stewart St., Suite 4001
Carson City, NV 89701

I. PERMIT INFORMATION

Have all operations associated with this permit been terminated in accordance with applicable permit conditions?

Yes No

If No, provide reason for submission of this Notice of Termination:

Permit Identification Number (e.g. CSW-xxxx, ISW-xxx, or MSW-xxxx):

Date of Termination: Date Format: XX/XX/XXXX

Are you filing this NOT due to a change in ownership or operator? Yes No

If yes, please attach a letter stating that the new owner and/or operator will assume responsibility for stormwater activity at the permitted site as permitted by NPDES Stormwater General Permit. **THIS LETTER MUST BE SIGNED BY THE PERMITTEE ACCEPTING RESPONSIBILITY AND INCLUDE THE SITE ID NUMBER.**

II. SITE OWNER/OPERATOR INFORMATION

Name: Las Vegas Paving Corp. Phone: (702) 510-1278
Address: 4420 S. Decatur Blvd.
City: Las Vegas State: NV ZIP Code: 89103
Email address: thildreth@lasvegaspaving.com

III. NEW SITE OWNER/OPERATOR INFORMATION (If applicable)

Name: Phone:
Address:
City: State: ZIP Code:
Email address:

Has a new NOI been submitted? Yes No If yes, what is the new Site ID Number?
(e.g. CSW-xxxx, ISW-xxx, or MSW-xxxx) -

IV. SITE LOCATION INFORMATION

Name: Tronox LLC Phone: 510-1278
Address: 560 W. Lake Mead
City: Henderson State: NV ZIP Code: 89015
APN: 17813101002

V. CERTIFICATION

I certify under penalty of law that all stormwater discharges associated with Mining, Industrial, or Construction activity from the identified site that is authorized by the General Permit have been eliminated or that I am no longer the operator at the site. (Elimination of all stormwater discharges associated with construction activity occurs when disturbed soils at the construction site have been finally stabilized and temporary erosion and sediment control measures have been removed or will be removed at an appropriate time. Final stabilization means that all soil-disturbing activities at the site have been completed, and that a uniform perennial vegetative cover with a density of 70% of the native cover for unpaved areas and areas not covered by permanent structures has been established, or equivalent permanent stabilization measures (such as the use of riprap, gabions, or geo-textiles) have been employed.) I understand that by submitting this notice of termination, I am no longer authorized to discharge stormwater associated with Mining, Industrial or Construction activity under the NPDES Stormwater General Permit, and that discharging pollutants in stormwater associated with Mining, Industrial or Construction activity to waters of the United States is unlawful under the Clean Water Act where the discharge is not authorized by an NPDES permit. I also understand that the submittal of this Notice of Termination does not release an operator from liability for any violations of this permit or the Clean Water Act.

Print Name: Troy Hildreth
Signature: [Handwritten Signature] Date: 5/18/10

NEVADA DIVISION OF ENVIRONMENTAL PROTECTION
BUREAU OF WATER POLLUTION CONTROL
901 SOUTH STEWART STREET, SUITE 4001
CARSON CITY, NV 89701-5249
PHONE: (775) 687-9418

ANNUAL INVOICE

05/03/2010

TO: MR. TROY HILDRETH
LAS VEGAS PAVING CORP.
4420 S DECATUR BLVD
LAS VEGAS NV 89103

INVOICE: GENERAL PERMIT ANNUAL FEE FOR FISCAL YEAR 2011

FOR: TRONOX REMEDEATION PROJECT
Construction Stormwater General Permit
Site ID/Invoice Number: CSW- 16054
Annual Fee Due: July 1, 2010
Total Amount Due: \$200
Taxpayer ID (TIN):

In accordance with NRS 353.1467, payments to the State for \$10,000 or more must be paid electronically beginning July 1, 2008. Governmental entities are exempt. To enable electronic fee payments, starting on July 1, 2008, NDEP will accept E-check payments of any amount through our secure website <http://www.ndep.nv.gov/epayments>.

If paying by paper check please return this invoice with your payment and make checks payable to "NDEP-BWPC". Please write your Site ID/Invoice Number on the check and remit payment to the address above.

As a reminder, please note that Nevada Administrative Code (NAC) 445A.268 Section (5)(b) reads, in part, that a Permittee (discharger) who is covered under a general permit shall pay to the Director a nonrefundable fee of \$200 not later than July 1 of each year that the discharger is covered under that permit.

To Terminate coverage of the Nevada NPDES General Permit for Stormwater Discharges, the Permittee must submit a Notice of Termination ("NOT") form when their facilities no longer have any stormwater discharges associated with Construction activity as defined in the Nevada's General Stormwater Permit or EPA regulations at 40 CFR 122.26, or when they are no longer the operator of the site.

Forms are available at: <http://ndep.nv.gov/bwpc/storm01.htm>

If you have general questions about fees please call Stormwater Assistance at (775) 687-9430.

PLEASE RETURN THIS STUB WITH PAYMENT

Bureau of Water Pollution Control

New Billing Address or Contact Person:

Annual Fee Payment for Fiscal Year 2011

Organization: _____

Site Name: TRONOX REMEDEATION PROJECT

Contact Name: _____

Site ID/Invoice Number: CSW- 16054

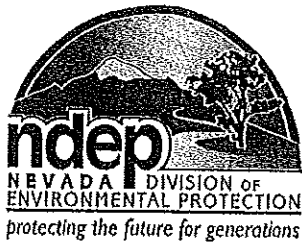
Address: _____

Taxpayer ID (TIN): _____

City/State/Zip: _____

Amount Due: \$200

Phone: _____



STATE OF NEVADA

Department of Conservation & Natural Resources

Brian Sandoval, Governor

Leo M. Drozdoff, P.E., Director

DIVISION OF ENVIRONMENTAL PROTECTION

Colleen Cripps, Ph.D., Administrator

1/14/2011

MRS. SUSAN CROWLEY
TRONOX LLC
8000 LAKE MEAD PKWY
HENDERSON, NV 89015

Dear: MRS. SUSAN CROWLEY

Re: Stormwater General Permit: NVR100000

Project ID Number: CSW-19689

Project Name: Tronox #2

Your submittal to be included under the Stormwater General Permit has been approved effective 01/14/2011. Please note that by submitting an NOI the permittee has certified that the project's Storm Water Pollution Prevention Plan (SWPPP) has been completed, that the SWPPP will be updated as necessary, and that it will be maintained at the permitted site.

At the time of any on-site inspections, our inspectors will ask to review your copy of the SWPPP in an effort to ensure proper compliance with the program.

Also note that Nevada Administrative Code (NAC) 445A.268 Section (5)(b) reads, in part, that a Permittee (discharger) who is covered under a general permit shall pay to the Director a nonrefundable fee of \$200 not later than July 1 of each year that the discharger is covered under that permit.

To Terminate coverage of the Nevada NPDES General Permit for Stormwater Discharges, the Permittee must submit a Notice of Termination ("NOT") form when their facilities no longer have any stormwater discharges associated with Construction activity as defined in the Nevada's General Stormwater Permit or EPA regulations at 40 CFR 122.26, or when they are no longer the operator of the site.

Should you have any questions, I can be reached at (775) 687-9434.

Sincerely,

Michele Reid
Environmental Scientist
Stormwater Program
Nevada Division of Environmental Protection

CC: Mr. Troy Hildreth Las Vegas Paving Corp 4420 S Decatur Las Vegas NV 89103

Re: Stormwater General Permit NVR100000

Confirmation Number: CSW-19689

Project Name: Tronox #2

Date: 1/6/2011

Owner

Tronox LLC.

Mrs. Susan Crowley

8000 Lake Mead Pkwy.

Henderson, NV 89015-_____

Operator

Las Vegas Paving Corp.

Mr. Troy Hildreth

4420 S. Decatur

Las Vegas, NV 89103-

Renewal: NO

* If this is a Renewal Application, NO filing fee is required.

Submission of this Electronic Notice of Intent constitutes notice that the Permittee identified in this request intends to be authorized by a National Pollutant Discharge Elimination System (NPDES) permit issued for storm water discharges in the State of Nevada and has or will comply with the following:

1. The Permittee will comply with all applicable permit conditions,
2. The Permittee understands that implementation of the Storm Water Pollution Prevention Plan, which is required under by the General Permit will begin at the time the permittee commences work on the project identified in Section I of this application,
3. The Permittee understands that failure to submit the required \$200.00 fee and this signed Section Certification within 30 days of the electronic submittal will result in failure for eligible coverage under the General Permit; and,
4. That Nevada Administrative Code (NAC) 445A.268 Section (5)(b) reads, in part, that a Permittee (discharger) who is covered under a general permit shall pay to the Director a nonrefundable fee of \$200 not later than July 1 of each year that the discharger is covered under that permit.
5. To Terminate coverage of the Nevada NPDES General Permit for Stormwater Discharges, the Permittee must submit a Notice of Termination ("NOT") form when their facilities no longer have any stormwater discharges associated with Construction activity as defined in the Nevada's General Stormwater Permit or EPA regulations at 40 CFR 122.26, or when they are no longer the operator of the site.

For Construction sites, elimination of all stormwater discharges associated with construction activity occurs when disturbed soils at the construction site have been finally stabilized and temporary erosion and sediment control measures have been removed or will be removed at an appropriate time. Final stabilization means that all soil-disturbing activities at the site have been completed, and that a uniform perennial vegetative cover with a density of 70% of the native cover for unpaved areas and areas not covered by permanent structures has been established, or equivalent permanent stabilization measures (such as the use of riprap, gabions, or geo-textiles) have been employed.

Please mail the filing fee of \$200.00 along with this notice to:

Stormwater Coordinator 3173
Bureau of Water Pollution Control
Nevada Division of Environmental Protection
901 South Stewart Street, Suite 4001
Carson City, NV 89701-5249

Should you have any questions, please call Bonnie Hartley at (775) 687-9430.

NOI Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. I also confirm that a storm water pollution prevention plan (SWPPP) has been completed, will be maintained at the project site from the start of construction activities, and that the SWPPP will be compliant with any applicable local sediment and erosion control plans. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines for knowing violations.

Owner or Operator Name (Please Print):

Signature (Please use a Non-Black Ink Color):

Troy Hildreth
Troy Hildreth

Nevada Division of Environmental Protection
Bureau of Water Pollution Control

ANNUAL INVOICE: GENERAL STORMWATER PERMIT FEE FOR FISCAL YEAR: 2012

TO: MR. TROY HILDRETH
LAS VEGAS PAVING CORP
4420 S DECATUR
LAS VEGAS NV 89103

05/05/2011

FOR: Site Name: TRONOX #2
Site ID/Invoice Number: CSW- 19689
Annual Fee Due: July 1, 2011
Total Amount Due: \$200

This invoice is a result of a permit that is currently held under one or both of the names listed above.

In accordance with Nevada Administrative Code (NAC) 445A.268 Section (5)(b) in part, a Permittee (discharger) who is covered under a general permit shall pay to the Director a nonrefundable fee of \$200 not later than July 1 of each year that the discharger is covered under that permit. Additionally, please note, in accordance with NRS 353.1467, payments to the State for \$10,000 or more must be paid electronically beginning July 1, 2008. Governmental entities are exempt. To enable electronic fee payment, starting on July 1, 2008, NDEP will accept E-check payments of any amount through our secure website <http://www.ndep.nv.gov/epayments>.

To terminate coverage of the Nevada NPDES General Permit for Stormwater Discharges, the Permittee must submit a Notice of Termination ("NOT") form when their facilities no longer have any stormwater discharges associated with construction activity as defined in the Nevada's General Stormwater Permit. **Please note, any "NOT's" that come in to our office after July 1st will be subject to pay the annual fee no matter the completion date of the project.** <http://ndep.nv.gov/bwpc/storm01.htm>.

Transfer of Ownership or Control: If control or ownership of the construction project changes, both the permittee and the succeeding owner or controller will complete a Notice of Change ("NOC") form in order to transfer permit coverage. All transfer of permits shall be approved by NDEP. <http://ndep.nv.gov/bwpc/storm01.htm>.

ALL DOCUMENTS SUBMITTED TO THIS OFFICE MUST HAVE AN ORIGINAL SIGNATURE(S).

If you have any questions or concerns, please call Stormwater Assistance at (775) 687-9430.

PLEASE RETURN THIS STUB WITH PAYMENT

If paying by paper check please make checks payable to "NDEP - BWPC". Remit payment to: Stormwater Coordinator 3173, NDEP - BWPC, 901 South Stewart Street Suite 4001, Carson City, NV 89701.

Annual Fee Payment for Fiscal Year 2012

New Billing Address or Contact Person:

Site Name: TRONOX #2

Organization: _____

Site ID/Invoice Number: CSW- 19689

Contact _____

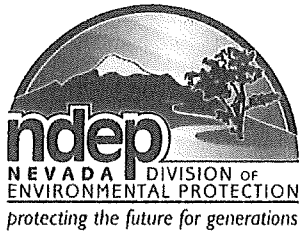
Taxpayer ID (TIN): _____

Address: _____

Amount Due: \$200

City/State/Zip: _____

Phone: _____



STATE OF NEVADA

Department of Conservation & Natural Resources

Brian Sandoval, Governor

Leo M. Drozdoff, P.E., Director

DIVISION OF ENVIRONMENTAL PROTECTION

Colleen Cripps, Ph.D., Administrator

Notice of Termination ("NOT") for Coverage under a General National Pollutant Discharge Elimination System ("NPDES") Permit

Submission of this NOT constitutes notice that the operator identified below is no longer authorized to discharge stormwater associated with construction activities, industrial activities or mining activities under the NPDES program. This form and other information are available at: <http://www.state.nv.us/ndep/bwpc/storm01.htm>.

Any questions concerning this form should be directed to the address below or to: Michele "Mickie" Reid at (775) 687-9434 mreid@ndep.nv.gov, Bonnie Hartley at (775) 687-9430 bhartley@ndep.nv.gov or Steve McGoff, P.E. at (775) 687-9429 smcgoff@ndep.nv.gov.

Submit the completed form to: Stormwater Coordinator 3173
Nevada Division of Environmental Protection
Bureau of Water Pollution Control
901 S. Stewart St., Suite 4001
Carson City, NV 89701.

I. PERMIT INFORMATION

Have all operations associated with this permit been terminated in accordance with applicable permit conditions?

Yes No

If No, provide reason for submission of this Notice of Termination:

Permit Identification Number: CSW- 19689; ISW- _____; MSW- _____

Date of Termination: 11/4/2011

Are you filing this NOT due to a change in ownership and/or operator? Yes No

If yes, please attach a signed Notice of Change ("NOC") form stating that the new owner and/or operator will assume responsibility at the site while the site is authorized to discharge stormwater associated with construction, industrial or mining activities. The NOC form can be found at:

http://ndep.nv.gov/bwpc/docs/construction_noc_2009.pdf.

II. SITE OWNER/OPERATOR INFORMATION

Name: LAS VEGAS PAVING CORP. Phone: 702-251-5800
Address: 4420 S DECATUR
City: LAS VEGAS State: NV ZIP Code: 89103
Email address: THILDRETH@LASVEGASPAVING.COM

III. NEW SITE OWNER/OPERATOR INFORMATION (If applicable)

Name: _____ Phone: _____
Address: _____
City: _____ State: _____ ZIP Code: _____
Email address: _____

Has a new NOI been submitted? Yes No

If yes, what is the new Permit Number? CSW-_____; ISW-_____; MSW-_____

IV. SITE LOCATION INFORMATION

Name: TRNOX #2 Phone: 510-1278
Address: 560 LAKE MEAD
City: HENDERSON State: NV ZIP Code: _____
APN: 17812401002

V. CERTIFICATION

I certify under penalty of law that all stormwater discharges associated with construction activity, industrial activity or mining activity from the identified site that is authorized by an NDEP General Permit have been eliminated or that I am no longer the operator at the construction site. I understand that by submitting this notice of termination, I am no longer authorized to discharge stormwater associated with construction activity under General Permit NVR100000, industrial activity under General Permit NVR050000 or mining activity under General Permit NVR030000 and that discharging pollutants in stormwater associated with either of these activities to waters of the United States is unlawful under the Clean Water Act where the discharge is not authorized by an NPDES permit. I also understand that the submittal of this Notice of Termination does not release an operator from liability for any violations of this permit or the Clean Water Act.

Print Name: Tracy Hildreth
Signature: [Handwritten Signature] Date: 11/4/2011



Clark County Department of Development Services



PERMIT

4701 West Russell Rd • Las Vegas NV 89118

(702) 455-3000

IMPORTANT: Always use the permit number below when requesting inspections or information concerning this permit.

PERMIT NUMBER 10-21350 GD6	PHONE SYSTEM NUMBER 13413224	INTERNET PIN NUMBER 287100	ISSUE DATE 9/14/10
-------------------------------	---------------------------------	-------------------------------	-----------------------

PARCEL NO: 178-13-501-001 RANGE-TOWNSHIP-SECTION 62-22-13

SITE ADDRESS: 560 W LAKE MEAD PKWY
TENANT NAME: BMI INDUSTRIAL PARK TENANT NO:

PROPERTY OWNER: TRONOX L L C
CONTRACTOR: LAS VEGAS PAVING CORPORATION

PERMIT: GRADING 100,001-OR MORE CY
 GRADING-COMMERCIAL VALUATION: 0
 COMMERCIAL SHORT
 BMI PARK - GRADING FOR SOIL REMEDIATION
 ONLY. FINAL GRADES NOT TO CHANGE
 DRAINAGE PATTERN OF THE EXISTING
 CONDITION UPON COMPLETION OF WORK

UNITS/RMS: 0	SQ FOOTAGE: 0	NO. STORIES: 0	QAA: NO
OCCUPANCY:	TYPE OF CONST:	SPRINKLER:	OCC LD:

PMT DETAIL:	QTY	ITEM
	1.00	100,000 + CY.
	23.00	100,000 + CY./ADD CY

FEE SUMMARY	CHARGED	PAID PREV	PAID
PERMIT FEE	1318.20	.00	1318.20
ZONING PC FEE	131.82	.00	131.82
GRADING PLAN REVIEW-BLD	381.00	381.00	.00
STRMSWR INSP 10.1-30 AC	600.00	.00	600.00

TOTAL PAID	2050.02
PAYMENT TYPE	CHECK
NUMBER	63894

CONDITIONS OF PERMIT

I agree to build according to declared description, approved plans, specifications and the Clark County Code. I also agree to call 455-3000 for required inspections as each construction phase is completed.

LICENSED CONTRACTORS DECLARATION

I hereby affirm that I am licensed under the provisions of NRS 624.283

Contractor Signature

OWNER-BUILDER DECLARATION

I, as owner of the property upon which I am requesting to build or improve a structure, and the structure to be built or improved is a residential structure which I intend to occupy. I do not intend to sell said structure or transfer ownership of said structure at least until I occupy the premises for a period of one year under NRS 624.031. I intend to act as my own contractor and I understand that I am liable to criminal prosecution under 624.212 if I engage in business as a contractor without a license and will not be exempt from license requirement as outlined in NRS 624.031.

9/14/10

DJKOCH

Applicant Signature

Date

Issued By

THIS PERMIT BECOMES NULL AND VOID if work or construction is not commenced within 180 days from date of issuance, or work is suspended or abandoned for a period of 180 days any time after work is commenced.

Inv Date	Inv No.	Invoice Amount	Disc Amt	Payment Amount	Balance Due
09/14/10	0914102050	2,050.02	0.00	2,050.02	0.00
Vendor - 30787 Clark County Departm			0.00	\$2,050.02	CK# 00263894 09/14/10

Welcome to Clark
County Development
Services

P 873

Bdg PU Ready/Renewal Permi

Permit Issue

Please have a seat and
Watch for your number
On the overhead

2:51pm

Displays

9-14-10



DEPARTMENT OF DEVELOPMENT SERVICES

4701 West Russell Road - Las Vegas, NV 89118 * (702) 455-3000

INSPECTION RECORD COMMERCIAL BUILDING

Site Address: 560 W LAKE MEAD PKWY Permit Nbr: 10-21350 GD6
 Owner Name: TRONOX L L C Owner Phn: 00
 Owner Address: P O BOX 268859, OKLAHOMA CITY OK 73126-8859, OKLAHOMA CITY OK 731268859
 Contractor: LAS VEGAS PAVING CORPORATION Ctr Phone: 251-5800
 Contr Addr: 4420 S DECATUR BLVD, LAS VEGAS NV 89103
 Subdivision: Unit#: Lot#: Block#: Parcel Nbr: 178-13-501-001 Nbr of Units: 0 Square Footage: 0
 Permit Type: GRADING PERMIT 100,001+ CY Construction Type: Occupancy:
 Appl Type: GRADING-COMMERCIAL Issue Date: 9/14/10
 Comments/Conditions: ENGINEER-OF-RECORD TO PROVIDE A LETTER
 Scope: BMI PARK - GRADING FOR SOIL REMEDIATION ONLY. FINAL GRADES NOT TO CHANGE DRAINAGE PATTERN OF THE E

Permits become null and void if construction is not commenced within 180 days from date of issuance or work is suspended or abandoned for a period of 180 days anytime after work is commenced.

CODE REQUIRED INSPECTIONS DATE-INSPECTOR

2207	Pad Grading (Soil / Certification)	
2222	Foundation:Footings	
3319	Ufer/Ground Electrode	

DO NOT POUR FOOTINGS UNTIL ABOVE ARE SIGNED

3311	Underground Electrical	
5511	Underground Mechanical	
3321	Slab Electrical	
4412	Underground Plumbing	
2229	Concrete Slab On Grade	

DO NOT POUR CONCRETE SLAB UNTIL ABOVE ARE SIGNED

2239	Shear Walls	
2236	Roof Sheathing	
3331	Rough Electrical	
4425	Water Piping	
4441	Rough Plumbing	
5551	Rough Mechanical	
4455	Sewer	
2268	Roof Underlayment & Flashing	
2244	Framing	
2249	Exterior Lath/Siding	
2252	Insulation	
2269	Interior Lath/Drywall	
3399	Final - Electrical	
4499	Final - Plumbing	
5599	Final - Mechanical	
	QAA Final Report	
2299	Final - Building	
3395	Electrical Meter Tag	
2295	Electrical Meter Tag	

CODE REQUIRED INSPECTIONS DATE-INSPECTOR

3111	Well, Electrical Underground, Partial	
3199	Well, Electrical Final, Partial	
2233	Columns & Supports	
2228	Concrete Floor/Deck	
2225	Concrete Wall	
2226	Masonry Pre Grout 'Lift	
	Masonry Pre Grout 'Lift	
	Masonry Pre Grout 'Lift	
2235	Subfloor Sheathing	
2284	Stucco Brown Coat	
2273	Suspended Ceiling Frame	
4469	Sump Pumps (Ejectors) Lifts	
4466	Sand/Oil Interceptor	
4479	Grease Interceptor	
4489	Boilers	
4422	Gas Piping	
4484	Gas Test AndTag	
4485	Gas Tag	
5535	Duct Detector Test	
5545	Damper (Smoke/Fire)	
5546	Rough Grease Duct	
5548	Grease Duct Enclosure	
5575	Type I Hood	
5577	Type II Hood	
	Hood Air Balance Report	
	Hood Extinguishing System (Fire Dept)	
5584	Gas Test And Tag (Mechanical)	
5585	Gas Tag (Mechanical)	
3381	Temporary Power	
3361	Generator Test	
3931	Fire Alarms (Rough Electrical)	
3991	Fire Alarms (Pre-Final)	



Clark County Department of Development Services



PERMIT

4701 West Russell Rd • Las Vegas NV 89118

(702) 455-3000

IMPORTANT: Always use the permit number below when requesting inspections or information concerning this permit.

PERMIT NUMBER 10-33981 6D6	PHONE SYSTEM NUMBER 13641956	INTERNET PIN NUMBER 021231	ISSUE DATE 2/08/11
PROJECT NAME BLACK MOUNTAIN INDUSTRIAL PARK		SUBDIVISION	

PARCEL NO: 178-13-501-001 RANGE-TOWNSHIP-SECTION 62-22-13

SITE ADDRESS: 560 W LAKE MEAD PKWY
 TENANT NAME: BLACK MOUNTAIN INDUSTRIAL TENANT NO:

PROPERTY OWNER: TRONOX L L C
 CONTRACTOR: LAS VEGAS PAVING CORPORATION

PERMIT: GRADING 100,001-OR MORE CY
 GRADING-COMMERCIAL VALUATION: 0
 COMMERCIAL SHORT
 GRADING ONLY//NO BUILDING//SOIL
 REMEDIATION ONLY CODE YEAR: 2006

UNITS/RMS: 0 SQ FOOTAGE: 0 NO. STORIES: 0 QAA: no
 OCCUPANCY: TYPE OF CONST: SPRINKLER: OCC LD:

PMT DETAIL:	QTY	ITEM
	1.00	100,000 + CY.
	29.00	100,000 + CY./ADD CY

FEE SUMMARY	CHARGED	PAID PREV	PAID
PERMIT FEE	1332.72	.00	1332.72
ZONING PC FEE	133.27	.00	133.27
GRADING PLAN REVIEW-BLD	413.40	413.40	.00
		TOTAL PAID	1465.99
		PAYMENT TYPE	CHECK
		NUMBER	69111

CONDITIONS OF PERMIT

I agree to build according to declared description, approved plans, specifications and the Clark County Code. I also agree to call 455-3000 for required inspections as each construction phase is completed.

LICENSED CONTRACTORS DECLARATION

I hereby affirm that I am licensed under the provisions of NRS 624.283

Contractor Signature

OWNER-BUILDER DECLARATION

I, as owner of the property upon which I am requesting to build or improve a structure, and the structure to be built or improved is a residential structure which I intend to occupy. I do not intend to sell said structure or transfer ownership of said structure at least until I occupy the premises for a period of one year under NRS 624.031. I intend to act as my own contractor and I understand that I am liable to criminal prosecution under 624.212 if I engage in business as a contractor without a license and will not be exempt from license requirement as outlined in NRS 624.031.

Applicant Signature

Date

Issued By

2/08/11

PAMELA

THIS PERMIT BECOMES NULL AND VOID if work or construction is not commenced within 180 days from date of issuance, or work is suspended or abandoned for a period of 180 days any time after work is commenced.

CUSTOMER COPY

CLARK COUNTY DESERT CONSERVATION PROGRAM
LAND DISTURBANCE / MITIGATION FEE FORM

- OFFICIAL USE ONLY -

All project proponents in the permit area are required to complete this form and submit it to the appropriate local agency. Authorization to develop property will not be granted by the local agency until this form has been submitted and is accepted as complete. The project proponent is responsible for securing all signatures required below and for accurately providing all required information.

Receipt #: _____
 Project #: 10-33981
 City / County: _____

PROPERTY SITE DESCRIPTION

Assessor's Parcel Number(s): 113-1-21-003
 OR
 Legal Description (Attach Separate Sheet If Required): _____

Legal Description includes: Township _____; Range _____; _____ 1/4 _____ 1/4 _____ 1/4 _____ of Section _____ (This will provide a property description to the nearest ten acres: 640 ac./sec * 1/64 sec. = ten acres). This information is available on County or City plat maps for the subject property. Provide property address and nearest major street intersection if existing. Also describe landmarks (e.g., shopping centers, railroad tracks, power lines or other unique features) with directions and distances to or from said landmarks.

Type of Development Permit Being Sought: _____

TOTAL ACREAGE IN PARCEL: _____ NUMBER OF ACRES WITHIN PARCEL TO BE DISTURBED: 00.00

CITY OR TOWN LOCATION: _____

PROPERTY OWNER - PRINT NAME _____ SIGNATURE _____ DATE _____

ADDRESS, CITY, STATE, ZIP _____ TELEPHONE NUMBER _____

PROJECT PROPONENT - PRINT NAME _____ SIGNATURE _____ DATE _____

ADDRESS, CITY, STATE, ZIP _____ TELEPHONE NUMBER _____

- FOR OFFICIAL USE ONLY -

Acres within Parcel to be developed verified by: <input type="checkbox"/> a. Building Department <input type="checkbox"/> b. Public Works <input type="checkbox"/> c. Zoning <input type="checkbox"/> d. Health District	Mitigation Fee Assessed: <u>0.00</u> ac. x \$550 = \$ <u>00.00</u>
	Compliance Report Fee (Administrative Fee) \$ <u>00.00</u>
	TOTAL FEES PAID \$ <u>00.00</u>

If exemption or reduction of fee applies, please explain below:

- Tortoise Mitigation Fee Previously Paid: Permit No. _____ (Attach Documentation)
- Property Previously Developed, Fee Not Applicable. Explain: _____
- Property Subject to Governmental Exemption _____ Explain Type of Project and Purpose: _____
- Other. Explain: _____

Received By: _____
 Date: _____

**CALCULATION OF ACRES DEVELOPED
 AND FEES PAID WILL BE AUDITED**



DEPARTMENT OF DEVELOPMENT SERVICES

4701 West Russell Road - Las Vegas, NV 89118 * (702) 455-3000

INSPECTION RECORD COMMERCIAL BUILDING

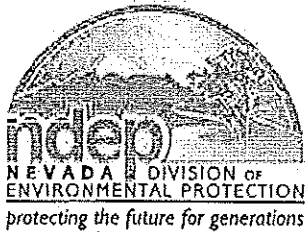
Site Address: 560 W LAKE MEAD PKWY Permit Nbr: 10-33981 GD6
 Owner Name: TRONOX L L C Owner Phn: 00
 Owner Address: P O BOX 268859, OKLAHOMA CITY OK 73126-8859, OKLAHOMA CITY OK 731268859
 Contractor: LAS VEGAS PAVING CORPORATION Ctr Phone: 251-5800
 Contr Addr: 4420 S DECATUR BLVD, LAS VEGAS NV 89103
 Subdivision: Unit#: Lot#: Block#: Parcel Nbr: 178-13-501-001 Nbr of Units: 0 Square Footage: 0
 Permit Type: GRADING PERMIT 100,001+ CY Construction Type: Occupancy:
 Appl Type: GRADING-COMMERCIAL Issue Date: 2/08/11
 Comments/Conditions: ENGINEER-OF-RECORD TO PROVIDE A LETTER
 Scope: GRADING ONLY//NO BUILDING//SOIL REMEDIATION ONLY, COMMERCIAL SHORT

Permits become null and void if construction is not commenced within 180 days from date of issuance or work is suspended or abandoned for a period of 180 days anytime after work is commenced.

CODE	REQUIRED INSPECTIONS	DATE-INSPECTOR	CODE	REQUIRED INSPECTIONS	DATE-INSPECTOR
2207	Pad Grading (Soil / Certification)		3111	Well, Electrical Underground, Partial	
2222	Foundation:Footings		3199	Well, Electrical Final, Partial	
3319	Ufer/Ground Electrode				
DO NOT POUR FOOTINGS UNTIL ABOVE ARE SIGNED					
3311	Underground Electrical		2233	Columns & Supports	
5511	Underground Mechanical		2228	Concrete Floor/Deck	
3321	Slab Electrical		2225	Concrete Wall	
4412	Underground Plumbing		2226	Masonry Pre Grout 'Lift	
2229	Concrete Slab On Grade			Masonry Pre Grout 'Lift	
DO NOT POUR CONCRETE SLAB UNTIL ABOVE ARE SIGNED					
				Masonry Pre Grout 'Lift	
2239	Shear Walls		2235	Subfloor Sheathing	
2236	Roof Sheathing		2284	Stucco Brown Coat	
			2273	Suspended Ceiling Frame	
3331	Rough Electrical				
4425	Water Piping		4469	Sump Pumps (Ejectors) Lifts	
4441	Rough Plumbing		4466	Sand/Oil Interceptor	
5551	Rough Mechanical		4479	Grease Interceptor	
			4489	Boilers	
4455	Sewer		4422	Gas Piping	
			4484	Gas Test And Tag	
2268	Roof Underlayment & Flashing		4485	Gas Tag	
2244	Framing				
2249	Exterior Lath/Siding		5535	Duct Detector Test	
2252	Insulation		5545	Damper (Smoke/Fire)	
2259	Interior Lath/Drywall		5546	Rough Grease Duct	
			5548	Grease Duct Enclosure	
3399	Final - Electrical		5575	Type I Hood	
4499	Final - Plumbing		5577	Type II Hood	
5599	Final - Mechanical			Hood Air Balance Report	
				Hood Extinguishing System (Fire Dept)	
	QAA Final Report		5584	Gas Test And Tag (Mechanical)	
			5585	Gas Tag (Mechanical)	
2299	Final - Building				
3395	Electrical Meter Tag		3381	Temporary Power	
2295	Electrical Meter Tag		3361	Generator Test	
			3931	Fire Alarms (Rough Electrical)	
			3991	Fire Alarms (Pre-Final)	
				Fire Alarms (Fire Dept. Testing)	

10.33981

PERMIT SET



STATE OF NEVADA

Department of Conservation & Natural Resources
DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

Certified Mail 7005-0390-0002-0503-6549

December 14, 2009

Michael J. Foster
Tronox, LLC.
3301 N. W. 150th
Oklahoma City, Oklahoma 73134

COUNTY OF CLARK
ZONING DIVISION
APPROVED
BY _____ DATE _____

RE: Enforcement Action for Failure to Complete Approved Site Remediation Activities, and Show Cause Meeting, Tronox, LLC, (Tronox) Henderson, Nevada, NDEP Facility ID Number 8-000539

Dear Mr. Foster:

Enclosed please find a Finding of Alleged Violation, Order, and State Environmental Commission Form #3. This enforcement action is the result of the failure of Tronox, its predecessors in interest and affiliates to complete approved remediation activities for the known contamination in both soil and groundwater at the Tronox facility located within the Black Mountain Industrial ("BMI") Complex, 8000 West Lake Mead Parkway, Henderson, Nevada. Nevada Division of Environmental Protection (the "Division") facility ID Number H-000539. Among other things, the enforcement action seeks injunctive relief to ensure compliance with Tronox's remediation obligations going forward.

The enclosed Order requires a representative of Tronox to appear before the Division to show cause why the Division should not proceed with an action for injunctive or other relief in District Court. Any violation of the terms of this Order could subject you to an action for appropriate relief pursuant to NRS 445A.695, 445A.700, 445A.705, 459.580, or 459.585.

Pursuant to NRS 445A.690, this Order is final and not subject to review unless, within thirty (30) days after the date the Order is served, a request by written petition for a hearing is received by the State Environmental Commission, John Walker, Executive Secretary, via mail to 901 South Stewart Street, Suite 4001, Carson City, Nevada 89701, or via facsimile to (775) 687-5856. I have included the appropriate form for an appeal hearing (Form #3) for your convenience. Please provide me with a copy of any correspondence you have with the Commission.

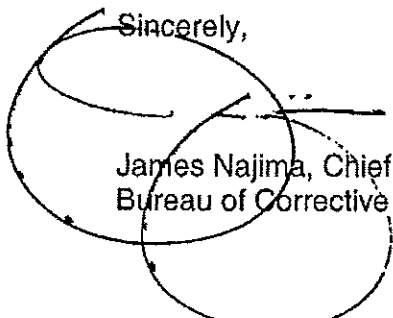
PERMIT SET



IN THE MATTER OF)
TRONOX, INC.)
December 14, 2009)
Page 2 of 19)

If you have any questions regarding this matter, please call me at (775) 687-9484.

Sincerely,



James Najima, Chief
Bureau of Corrective Actions

JN/slg

Enclosures (3)

Finding of Alleged Violation
Order
SEC Form #3

cc: w/Enclosures

Bill Frey, Senior Deputy Attorney General, Attorney General's Office, Carson City
Carolyn Tanner, Deputy Attorney General, Attorney General's Office, Carson City
Leo Drozdoff, P.E., Nevada Department of Environmental Protection, Carson City
Tom Porta, NDEP, Carson City
John Walker, Nevada State Environmental Commission, Carson City
Brian Rakvica, P.E., NDEP, Las Vegas
Shannon Harbour, P.E., NDEP, Las Vegas
Mr. Ken Baker, Chartis, Pollution Cap Claims Department, 175 Water Street, 12th
Floor, New York, New York 10038
Mitch Kaplan, U.S. Environmental Protection Agency, Region 9, mail code:
WST-5, 75 Hawthorne Street, San Francisco, CA 94105-3901
Ebrahim Juma, Clark County DAQEM, 500 South Grand Central Parkway, PO
Box 555210, Las Vegas, NV, 89155-5210
Robert Williams, Clark County Fire Department, 575 East Flamingo Road, Las
Vegas, Nevada 89119
Ranajit Sahu, BRC, 311 North Story Place, Alhambra, CA 91801
Rick Kellogg, BRC, 875 West Warm Springs, Henderson, NV 89011
Mark Paris, BEC, 875 West Warm Springs, Henderson, NV 89011
Rex Heppe, 2925 East Patrick Lane, Suite M, Las Vegas, NV 89120-2457
David Sadoff, AIG Consultants, Inc., 121 Spear Street, 3rd Floor, San Francisco,
CA 94105
Leslie Hill, U.S. Department of Justice, PO Box 23896, Washington, DC
20026-3986
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

IN THE MATTER OF)
TRONOX, INC.)
December 14, 2009)
Page 3 of 19)

Nicholas Pogoncheff, PES Environmental, Inc., 1682 Novato Blvd., Suite 100,
Novato, CA 94947-7021
Susan Crowley, Crowley Environmental LLC, 366 Esquina Dr., Henderson,
NV 89014
Susan Crowley, Tronox LLC, PO Box 55, Henderson, Nevada 89009
Mike Skromyda, Tronox LLC, PO Box 55, Henderson, Nevada 89009
Keith Bailey, Environmental Answers, 3229 Persimmon Creek Dr, Edmond,
Oklahoma 73013
Lee Erickson, Stauffer Management Company, P.O. Box 18890, Golden,
CO 80402
Michael Bellotti, Olin Corporation, 3855 North Ocoee Street, Suite 200,
Cleveland, TN 37312
Curt Richards, Olin Corporation, 3855 North Ocoee Street, Suite 200, Cleveland,
TN 37312
Paul Sundberg, Montrose Chemical Corporation, 10733 Wave Crest Court
Stockton, CA 95209
Joe Kelly, Montrose Chemical Corporation of CA, 600 Ericksen Avenue NE,
Suite 380, Bainbridge Island, WA 98110
Deni Chambers, Northgate Environmental Management, Inc., 300 Frank H.
Ogawa Plaza, Suite 510, Oakland, CA 94612
Robert Infelise, Cox Castle Nicholson, 555 California Street, 10th Floor,
San Francisco, CA 94104-1513
Michael Ford, Bryan Cave, One Renaissance Square, Two North Central
Avenue, Suite 2200, Phoenix, AZ 85004
Jeff Gibson, AMPAC, 3883 Howard Hughes Pkwy, Ste 700, Las Vegas,
NV 89169

ORDER

This Order is issued under the authority vested in the Director of the Department of Conservation and Natural Resources ("Department") by Nevada Revised Statutes (NRS) 445A.445 (1), 445A.450 (8), and 459.470, delegated to the Division of Environmental Protection ("Division") pursuant to NRS 445A.450 (9) and 459.480, and in accordance with NRS 445A.675, 445A.690, 459.565 (1), and 459.570.

On the basis of the attached Finding of Alleged Violation ("FOAV"), which is a part of this Order, the Administrator of the Division, pursuant to authority delegated to him by the Director of the Department of Conservation and Natural Resources, has determined that Tronox, LLC ("Tronox") is in violation of Nevada Water Pollution Control Law, the Nevada Hazardous Waste Law, the Resource Conservation and Recovery Act, the Phase 2 Consent Order, the 1986 Consent Order, and the 2001 Consent Order as outlined in the Finding of Alleged Violation and that, among other remedies, injunction relief is required to ensure Tronox's compliance with its remediation obligations going forward.

IT IS HEREBY ORDERED:

Tronox shall complete the following acts at/or with respect to the Tronox Facility located within the Black Mountain Industrial ("BMI") Complex, 8000 West Lake Mead Parkway in Henderson, Nevada (hereinafter "the Site") by the dates specified:

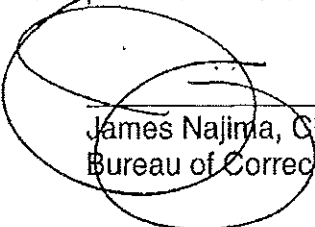
1. Immediately maintain the Site in compliance with all federal, state, and local environmental laws to protect human health and the environment.
2. Within ten (10) days of the date of this Order: Submit to the Division a written reply which states Tronox's intention to comply with the Order including its obligation to maintain the Site in compliance with all federal, state, and local environmental laws to protect human health and the environment.
3. Within sixty (60) days of the date of this Order: Submit to the Division a detailed plan, including a detailed schedule and timeline, that explains how Tronox will ensure that the existing groundwater treatment system ("GWTS") will remain fully operational, as defined herein, until the remedial actions are completed.

a. The term "fully operational" is defined as the pumping and treating of impacted groundwater in accordance with the Administrative Orders on Consent issued by the Division on the following dates: September 9, 1986; April 25, 1991; August 1, 1996; July 26, 1999; October 8, 2001; and April 12, 2005; the following NDEP Bureau of Water Pollution Control

permits: NV 0023060; NEV2001515; NEV2001516; UNEV94218; and any additional permits and requirements as provided by the Division to determine that adequate capture and treatment is occurring to protect human health and the environment.

4. Within sixty (60) days of the date of this Order: Submit to the Division a detailed plan, including a detailed schedule and time line which explains how Tronox will complete the Remedial Alternative Studies ("RAS") required under the August 1, 1996 Consent Agreement ("the Phase 2 Consent Order"). The RAS documents shall address the issue of source control and reduction, and optimization of groundwater treatment.
5. Within sixty (60) days of the date of this Order: Tronox must provide documentation of financial assurance evidencing the existence of the funds necessary to conduct the required corrective actions at the Site.
6. Within thirty (30) days of the date of this Order: Tronox must present a plan for providing an emergency generator system for the GWTS or an alternate plan that is acceptable to the Division, to ensure continuous operation of the GWTS system.
7. Within thirty (30) days of the date of this Order: Tronox must provide a schedule for the complete removal of contaminated soils from the Site by December 31, 2010.
8. By December 31, 2010: Tronox must complete source control of contaminated soils at the Site.
9. Within ten (10) days of the date of this Order: Submit to the Division a copy of all insurance policies that are currently being used to fund the environmental activities at the Site, together with documentation evidencing (a) claims and payouts made pursuant to such policies, (b) any expenses incurred as part of any self-insured retention pursuant to such policies, (c) the term of such policy, and (d) and any other information related to coverage concerning the Site.
10. Within ten (10) days of the date of this Order: Contact Jim Najima, Chief of the Bureau of Corrective Actions of the Division to arrange a meeting at the Division's Carson City office to show cause why the Division should not seek civil penalties for the violations cited in the FOAV.

Dec 14, 2009
Date


James Najima, Chief
Bureau of Corrective Actions

FINDING OF ALLEGED VIOLATION

I. This Finding of Alleged Violation is based upon the following:

A. RELEVANT STATUTORY AND REGULATORY AUTHORITY UNDER THE NEVADA WATER POLLUTION CONTROL LAW:

1. It is the policy of the State of Nevada and the purpose of the Nevada Water Pollution Control Law, codified at Nevada Revised Statutes (NRS) 445A.300 to 445A.730 inclusive (the "NWPCL"), "(a) to maintain the quality of the waters of the State consistent with the public health and enjoyment, the propagation and protection of terrestrial and aquatic life, the operation of existing industries, the pursuit of agriculture, and the economic development of the State, and (b) to encourage and promote the use of methods of waste collection and pollution control for all significant sources of water pollution (including point and diffuse sources)."
2. The State of Nevada, Department of Conservation and Natural Resources, Division of Environmental Protection (the "Division"), under the authority of NRS 445A.445 (1) and 459.475, has the power and the duty to administer and enforce the provisions of the NWPCL.
3. The Division is authorized by NRS 445A.675 and 445A.690 to make findings and issue orders to address violations of the NWPCL.
4. NRS 445A.465 states:

Injection of fluids through a well or discharge of pollutant without a permit prohibited; regulations:

1. Except as authorized by a permit issued by the department pursuant to the provisions of NRS 445A.300 to 445A.730, inclusive, and regulations adopted by the commission, it is unlawful for any person to:

- (a) Discharge from any point source any pollutant into any waters of the state or any treatment works.
- (c) Discharge from a point source a pollutant or inject fluids through a well that could be carried into the waters of the state by any means.
- (d) Allow a pollutant discharged from a point source or fluids injected through a well to remain in place where the pollutant or fluids could be carried into waters of the state by any means.

5. The Division may issue an Order requiring the owner or operator of a property whereon hazardous waste, hazardous substances and/or regulated substances are released to take corrective action to address soil contamination pursuant NAC 445A.227, and to provide a plan and schedule for completing corrective action pursuant to NAC 445A.2271.
6. The Division may issue an Order requiring the owner or operator of a property whereon hazardous waste, hazardous substances and/or regulated substances are released to take corrective action to address groundwater contamination pursuant NAC 445A.22725, and to provide a plan and schedule for completing corrective action pursuant to NAC 445A.2273.

B. RELEVANT STATUTORY AND REGULATORY AUTHORITY UNDER THE NEVADA HAZARDOUS WASTE LAW:

1. It is the purpose of the Nevada Hazardous Waste Law codified at NRS 459.400 to 459.600 inclusive (the "NHWL"), to "(1) Protect human health, public safety and the environment from the effects of improper, inadequate or unsound management of hazardous waste; (2) Establish a program for regulation of the storage, generation, transportation, treatment and disposal of hazardous waste; and (3) Ensure safe and adequate management of hazardous waste."
2. The Division has the power to enforce all rules, regulations and standards promulgated by the Nevada State Environmental Commission (the "SEC") under the NHWL pursuant to NRS 459.475 (1), to act as the state agency for the purposes of federal laws and regulations on hazardous waste pursuant to NRS 459.470, as delegated pursuant to NRS 459.480.
3. Pursuant to NRS 459.565, if the Division receives information that the handling, storage, transportation, treatment or disposal of any waste or hazardous substance at a facility may present an *"imminent and substantial hazard to human health, public safety or the environment,"* it may issue an order to the owner or operator of the facility or the custodian of the hazardous waste to take all necessary steps to prevent the act or eliminate the practice which constitutes the hazard. The Division may also order a site assessment to be conducted and a remediation plan to be developed, assess costs and expenses incurred by the Division in removing, correcting or terminating any hazard to human health, public safety or the environment, seek injunctive relief; and take any other action designed to reduce or eliminate the hazard.

4. NAC 459.9533 defines "Ammonium Perchlorate" as a highly hazardous substance, per all applicable thresholds.
5. Per the United States Environmental Protection Agency, National Center for Environmental Assessment, "Hexavalent Chromium" is classified as a human carcinogen. See <http://www.epa.gov/ncea/iris/toxreviews/0144-tr.pdf> chromium.
6. Pursuant to NRS 459.570, the Division has the power to issue orders to address violations of the NHLW, including any regulation, or term or condition of a permit issued by the Division.
7. Nevada adopts and enforces the regulations applicable to the Resource Conservation and Recovery Act ("RCRA"). NAC 444.8632 states in part: Compliance with federal regulations adopted by reference. In addition to the requirements of NAC 444.850 to 444.876, inclusive, a person who generates, transports, treats, stores, disposes or otherwise manages hazardous waste or used oil shall comply with all applicable requirements of, and may rely upon applicable exclusions or exemptions under, 40 C.F.R. Part 2, Subpart A, Part 124, Subparts A and B, Parts 260 to 270, inclusive, Part 273 and Part 279, as those provisions existed on July 1, 2007, which, except as otherwise modified by NAC 444.86325, 444.8633 and 444.8634, are hereby adopted by reference. The Commission may use federal statutes and regulations that are cited in 40 C.F.R. Part 2, Subpart A, Part 124, Subparts A and B, Parts 260 to 270, inclusive, Part 273 and Part 279 to interpret these sections and parts.
8. RCRA defines a "solid waste management unit" as "any discernable unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released." 55 Fed. Reg. 30808 (1990).
9. In relevant part, RCRA 3004 addresses solid waste management units as follows:

(u) Continuing releases at permitted facilities

Standards promulgated under this section shall require, and a permit issued after November 8, 1984, by the Administrator or a State shall require, corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage, or disposal facility seeking a permit under this subchapter, regardless of the time at which waste was placed in such unit. Permits issued under section 6925 of this title shall contain schedules of compliance for such corrective action (where such corrective action

cannot be completed prior to issuance of the permit) and assurances of financial responsibility for completing such corrective action.

(v) Corrective action beyond facility boundary

As promptly as practicable after November 8, 1984, the Administrator shall amend the standards under this section regarding corrective action required at facilities for the treatment, storage, or disposal, of hazardous waste listed or identified under section 6921 of this title to require that corrective action be taken beyond the facility boundary where necessary to protect human health and the environment unless the owner or operator of the facility concerned demonstrates to the satisfaction of the Administrator that, despite the owner or operator's best efforts, the owner or operator was unable to obtain the necessary permission to undertake such action. Such regulations shall take effect immediately upon promulgation, notwithstanding section 6930(b) of this title, and shall apply to--

(1) all facilities operating under permits issued under subsection (c) of this section, and

(2) all landfills, surface impoundments, and waste pile units (including any new units, replacements of existing units, or lateral expansions of existing units) which receive hazardous waste after July 26, 1982.

Pending promulgation of such regulations, the Administrator shall issue corrective action orders for facilities referred to in paragraphs (1) and (2), on a case-by-case basis, consistent with the purposes of this subsection.

10. 40 C.F.R. 260.10 defines a "Facility" subject to RCRA regulation as:

(1) All contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste, or for managing hazardous secondary materials prior to reclamation. A facility may consist of several treatment, storage, or disposal operational units (e.g., one or more landfills, surface impoundments, or combinations of them).

(2) *For the purpose of implementing corrective action under 40 CFR 264.101 or 267.101, all contiguous property under the control of the owner or operator seeking a permit under Subtitle C of RCRA. This definition also applies to facilities implementing corrective action under RCRA Section 3008(h).*

(3) Notwithstanding paragraph (2) of this definition, a remediation waste management site is not a facility that is subject to 40 CFR 264.101, but is subject to corrective action requirements if the site is located within such a facility.

[Emphasis added.]

11. RCRA 3005(e) defines a facility subject to interim status as:

(1) Any person who--

(A) owns or operates a facility required to have a permit under this section which facility--

(i) was in existence on November 19, 1980, or

(ii) is in existence on the effective date of statutory or regulatory changes under this chapter that render the facility subject to the requirement to have a permit under this section,

(B) has complied with the requirements of section 6930(a) of this title, and

(C) *has made an application for a permit under this section,*

shall be treated as having been issued such permit until such time as final administrative disposition of such application is made, unless the Administrator or other plaintiff proves that final administrative disposition of such application has not been made because of the failure of the applicant to furnish information reasonably required or requested in order to process the application. This paragraph shall not apply to any facility which has been previously denied a permit under this section or if authority to operate the facility under this section has been previously terminated.

[Emphasis added.]

12. Pursuant to RCRA 3008(h), facilities with interim status are subject to corrective action orders. Specifically, RCRA 3008(h) states in part:

(1) Whenever on the basis of any information the Administrator determines that there is or has been a release of hazardous waste into the environment from a facility authorized to operate under section 6925(e) of this title, *the Administrator may issue an order requiring corrective action or such other response measure as he deems necessary to protect human health or the environment* or the Administrator may commence a civil action in the United States district court in the district in which the

facility is located for appropriate relief, including a temporary or permanent injunction.

[Emphasis added].

13. Pursuant to 40 C.F.R. Part 265, Subpart H, the Division may require financial assurance from interim status facilities to ensure the funding of the costs of remediation, including adjustments for current cost estimates of clean-up, inflation, and insufficiency of posted financial assurance .

C. RELEVANT BACKGROUND

1. Kerr-McGee Corporation, Kerr-McGee Chemical, LLC, its affiliates, and successors-in-interest have owned and operated an industrial facility at the BMI Complex in Henderson, Nevada (the "Site") for approximately fifty years. Tronox, LLC took ownership of the Site in or about 2005. These entities are collectively referred to herein as the "Parties."
2. Ending in approximately 1998, the Parties produced ammonium perchlorate, magnesium perchlorate, potassium perchlorate, and sodium perchlorate (collectively, "perchlorate") at the Site. As a result of manufacturing operations at the Site, additional contaminants are found in the groundwater at or near the Site in concentrations above the limits set by the NHL. These contaminants include: hexavalent chromium, perchlorate, asbestos, dioxins, total petroleum hydrocarbons, organochlorine pesticides, aluminum, antimony, arsenic, lead, mercury, radium, thorium, uranium, various semi-volatile and volatile organic compounds. The contaminated groundwater flows into the Las Vegas Wash, into Lake Mead and on to the Colorado River.
3. Pursuant to its authority under the NWPC, and the NHL, the Division issued an Administrative Order on Consent on September 9, 1986 to Kerr McGee Chemical Corporation (the "1986 Consent Order") requiring the remediation of the hexavalent chromium contamination in groundwater. Pursuant to the 1986 Consent Order, the Parties installed a system of monitoring and interceptor wells and groundwater treatment systems at and around the Site and the larger BMI Complex to slow the migration of impacted groundwater.
4. On April 25, 1991, the Division entered an Administrative Order on Consent (the "Phase 1 Consent Order") with land and facility owners within the BMI Complex which set the first phase of a three phase process to investigate, characterize, and if necessary, remediate the hazardous waste releases in the common areas, as well as individually owned sites, within the BMI Complex and surrounding lands and waters.

5. Based upon the reports received pursuant to the Phase 1 Consent Order, the Division issued an Administrative Order on Consent on August 1, 1996 to Kerr-McGee Chemical Corporation (the "Phase 2 Order") to require additional investigation, characterization, and if necessary, remediation of waste releases at or associated with the Site which may pose a threat to human health, welfare, or the environment.
6. In 1997, perchlorate was detected in the Colorado River. The source of this contamination was subsequently traced to the groundwater beneath the Site. On July 26 1999, the Division issued an Administrative Order on Consent to Kerr McGee Chemical, LLC (the "1999 Consent Order"), requiring the establishment of groundwater collection and treatment facilities to remediate this perchlorate contamination.
7. Following the installation of such remedial systems, the Division issued an Administrative Order on Consent to Kerr-McGee Chemical, LLC on October 8, 2001 (the "2001 Consent Order"), and again on April 12, 2005 (the "2005 Consent Order"), modifying and refining the remedial technologies and systems employed at the Site.
8. Since 2007, Basic Remediation Company ("BRC") has managed a Corrective Action Management Unit ("CAMU") pursuant to a RCRA permit to address source contaminants within the BMI Complex. The CAMU has been permitted to accept contaminated soils from individual corporate landowners within the BMI Complex, at significant cost savings due to its proximate location. Upon information and belief, BRC intends to cap off the CAMU in late 2010, thereby precluding any further deposits of contaminated soils.
9. Upon information and belief, Tronox is the beneficiary of an insurance policy with Chartis to address remediation at and around the Site, including the removal of contaminated soils to a CAMU. Upon information and belief, the Chartis insurance policy expires on December 31, 2010.

II. FINDINGS OF ALLEGED VIOLATIONS: The Division finds and alleges as follows:

- A. **FINDING:** Without waiving any claim against Kerr-McGee Chemical Corporation, Kerr-McGee Chemical, LLC, Anadarko Petroleum Corporation, its affiliates, predecessors-in-interest, and successors-in-interest or any other party, the Division finds that Tronox is a successor-in-interest, and an owner and operator of the Site subject to all laws, rules, regulations and standards promulgated by the State Environmental

Commission ("SEC"), and all orders and permits promulgated by the Department, as delegated to the Division.

B. **FINDING:** The Parties are in violation of NAC 445A.227, 445A.2271, 445A.22725, and 445A.2273 of the NWPCL, and NRS 459.565 of the NHWL for failing to complete required assessments and reports of the effectiveness of the pump and treat groundwater system ("the GWTS"). These actions also give rise to the violation of the 1986 Consent Order, the Phase 2 Consent Order and the 2001 Consent Order which were executed in accordance with this authority.

1. Pursuant to its authority under NRS 445A.445 (1), NAC 445A.227, 445A.2271, 445A.22725, and 445A.2273 of the NWPCL, and NRS 459.475(1) and 459.565 of the NHWL, the Division issued multiple administrative orders on consent to the Parties requiring the investigation, characterization, and remediation of releases at or associated with the Site which may pose a threat to human health, welfare, or the environment.
2. Pursuant to the 1986 Consent Order, paragraph 6, the Parties are required to demonstrate on a monthly basis that overlapping cones of depression are achieved. This has not been done, nor has any acceptable alternative been performed or proposed.
3. Pursuant to the 1986 Consent Order, paragraph 7, "If the monitoring results required in Paragraph 6, occurring six (6) months after initial operation of the intercept system, demonstrate that the system is not effectively collecting the intended groundwater plume, the Department may require KMCC to implement the Contingency Plan set forth in Paragraph 8." Paragraph 8 states "KMCC shall prepare and submit to the Department for review and approval an Intercept System Contingency Plan, pursuant to the schedule set forth in Appendix B. This Plan will set forth additional measures to be implemented to improve and update the installed Intercept System to correct, to the extent possible, the deficiencies identified."

According to Appendix B of the 1986 Consent Order "the schedule of implementation for the proposed groundwater mitigation program at the Henderson Facility with time for completion after approval by the Nevada DEP" for the Intercept System Contingency Plan was 7 months. On December 18, 1986, the Division approved the "electrochemical reduction process for chromium-removal". Upon information and belief, this is the approval date referenced in Appendix B, and thus the Intercept System Contingency Plan

should have been submitted in July 1987. Upon information and belief, the Parties failed to submit a contingency plan.

4. Pursuant to the 2001 Consent Order, Section II.B., the Parties are required to install an extraction well system at the Athens Road area of the Site (as further described by the 2001 Consent Order), designed to remove up to 400 gallons per minute of groundwater with the objective of capturing perchlorate flux at this location. As noted herein, the Parties have failed to demonstrate this capture.
5. The Division advised Tronox that the GWTS does not appear to be providing adequate capture at either the Plant Site well field or at the Athens Road well field (each as further described in the Orders).
6. The Division has advised Tronox that the Seep Area well field (as described in the Orders) fails to provide capture of contaminants, and Tronox is currently flow-rate limited to address the Seep Area. The Parties have failed to provide an assessment and report indicating that additional capture is unnecessary in this area, nor have they attempted to capture additional contaminants.
7. The Division advised Tronox to install additional wells and to explore alternate treatment processes such as in-situ bioremediation in the Seep Area.
8. On March 28, 2007, the Division notified Tronox that it must evaluate and report on the effectiveness the GWTS. The Division requires this information so that it may accurately determine the necessity of further corrective action.
9. The Division has attempted to obtain this required information from Tronox informally without success. Between August 29, 2006 and August 28, 2007, the Division reiterated this requirement to Tronox on at least four occasions.
10. Tronox refuses to comply with these directives. Tronox contends that its existing insurance policy under Chartis will not cover multiple treatment systems such as an in-situ bioremediation. And to date, Tronox has refused to install additional wells.
11. Tronox submitted a work plan to evaluate the effectiveness of the GWTS (also known as the Capture Zone Analysis) on May 30, 2007, a revised work plan on August 30, 2007, and a second revised work plan on November 29, 2007.

12. On December 11, 2007, the Division approved the revised work plan dated November 29, 2007.
 13. Tronox has failed to fully implement the approved work plan. Specifically, Tronox has failed to install the required wells in the Seep Area. Without the installation of these wells, any evaluation of the GWTS will be incomplete.
 14. As of the date of this FOAV, Tronox has failed to provide to the Division a complete evaluation of the effectiveness of the GWTS.
- C. **FINDING:** The Parties are in violation of the Phase 2 Consent Order, Section III. Parties Bound. The Phase 2 Consent Order was executed by Kerr-McGee Chemical Corporation. The notification requirements of Section III. regarding change of corporate status have not been complied with.
- D. **FINDING:** The Parties are in violation of the Phase 2 Consent Order, Section IV. Work To Be Performed.
1. On October 3, 2005, the Division agreed to allow Tronox to complete a phased approach to the investigation of the sources of contamination at the Site. The data obtained from the required investigation is to be used to generate a Remedial Alternative Study ("RAS") to fulfill the Parties' obligations under the Phase 2 Consent Order.
 2. Tronox has shown a history of inappropriate delay in the completion of this investigation. Between October 3, 2005 and November 2, 2007, the Division met with Tronox sixteen times to discuss the first phase of this investigation ("Phase A").
 3. After approximately six months of delays and discussions, Tronox implemented and reported to the Division on November 2, 2007.
 4. Between April 5, 2007 and December 4, 2008, the Division met with Tronox twenty-four times to discuss the second phase of this investigation ("Phase B"). The Phase B work plan was broken into six segments - Areas I through IV for soils, one segment for soil gas, and one for site-wide groundwater. Each of these segments required numerous revisions, delays, and Division mark-ups before they were acceptable and approved.
 5. The Phase B Work plan has only recently been completed on November 12, 2009.

6. On October 7, 2009, Tronox discussed the draft results of the Area I Phase B investigation with the Division. To date, Tronox has failed to submit either draft or final results to the Division.
 7. Tronox advised the Division that it will further investigate Area I based upon their initial, and to date undisclosed, results. Additional sampling was proposed on November 19, 2009. Tronox's sampling proposal was wholly deficient, and the Division requested the submission of additional information to complete the sampling proposal.
 8. The Division has repeatedly expressed concern to Tronox and Chartis that remediation appears necessary, and that Tronox and Chartis have failed to provide an appropriate schedule to ensure that this work is completed in a timely fashion.
 9. Tronox's responses to the Division's requests are unacceptable and in bad faith. The Phase 2 Consent Order has been in place for over thirteen years, and Tronox has not produced a RAS for any media (soil, groundwater, etc.) or for any area of the Site, as required by the Phase 2 Consent Order.
 10. Without completion of the Deliverables required by the Phase 2 Consent Order, remediation contemplated by a Phase 3 Consent Order is stalled.
- E. FINDING:** The Parties are in violation of the Phase 2 Consent Order, Section XVII. Reimbursement of Division Oversight Costs. Tronox has failed to reimburse the Division for \$37,024.52 as invoiced on April 6, 2009.
- F. FINDING:** The Parties are in violation of RCRA §§ 3004(u) and 3008(h) and 40 C.F.R. Part 265, Subpart H, and the 1986 Consent Order, paragraph 28. The Parties have failed to provide adequate financial assurance to address the unacceptable risks to human health and the environment posed by the contaminants at the Site.
1. The Site is subject to corrective action under RCRA 3004(u) and 3008(h).
 2. The financial assurance provided by Kerr-McGee Chemical Corporation in the Post Closure Permit Application dated July 24, 1987 is no longer viable as Kerr McGee Chemical Corporation is in default of its financial assurance obligations.

3. Pursuant to the 1986 Consent Order, Paragraph 28, the Parties agreed to unconditionally guarantee performance of its obligations thereunder, and to affirm their financial capability on an annual basis, upon request by the Division.
4. The Division finds that financial assurance provided by Tronox through the Chartis insurance policy is now insufficient.
 - i. Upon information and belief, the Chartis Policy is due to expire on December 31, 2010.
 - ii. Remediation at the Henderson Facility is estimated to take more than ten years, well in excess of the twelve months of coverage remaining under the Chartis Policy.
 - iii. Upon information and belief, the Chartis Policy disallows coverage of in-situ bioremediation in the Seep Area, contrary to the directive of the Division.

G. FINDING: The Parties are in violation of NRS 445A.465 for allowing pollutants discharged from a point source or fluids injected through a well to remain in place where the pollutants or fluids could be carried into the waters of the State by any means.

1. The delays caused by the Parties in violation of the Administrative Orders on Consent as outlined herein have caused undue delay of source control at or around the Site.
2. Over 800,000 cubic yards of contaminated soil are believed to remain on Site, resulting in exponentially higher costs of maintaining the GWTS, and frustrating the process of remediation.
3. The Parties currently have the ability to access the CAMU within the BMI Complex with capacity to hold the contaminated soils from the Site.
4. Immediate source control will significantly reduce the overall costs of the GWTS and remediation.

H. FINDING: The Parties' failure to operate the GWTS will result in imminent degradation of the Las Vegas Wash, Lake Mead and the Colorado River, and an imminent and substantial threat to human health, in violation of NRS 445A.305, NRS 459.400, NAC 445A.144.

1. Based upon the modeling conducted by the Division, with the assumption of a Las Vegas Wash base load of sixty pounds per day of perchlorate, the following is estimated:

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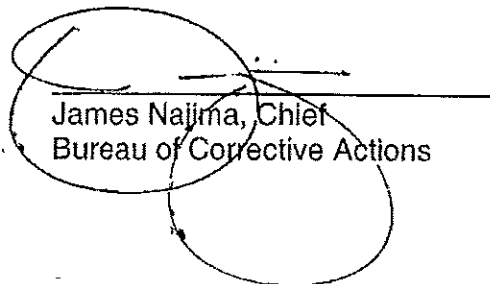
- a. The loading of perchlorate will increase by 23% immediately upon the GWTS being shut down.
 - b. The loading of perchlorate will increase by over 100% within 18 months of the GWTS being shut down.
 - c. The loading of perchlorate will increase by over 860% within 24 months of the GWTS being shut down.
2. Based upon information provided by Veolia Water North America, the operator of the GWTS, the following is estimated:
 - a. The microbial culture used in the GWTS will die within two to three days of the GWTS being shutdown.
 - b. It may take between six and twelve months to reestablish the microbial culture within the GWTS, should it die.
3. Based upon information provided by the Southern Nevada Water Authority (SNWA) and modeling conducted by their environmental contractor Flowscience, the following is estimated:
 - a. Concentrations of perchlorate in Lake Mead are expected to increase by 1200% within 24 months in the event that the GWTS is shut off.
 - b. Concentrations of perchlorate in the Colorado River system and the Metropolitan Water District intake pipeline are expected to increase by 300% within 24 months in the event that the GWTS is shut off.
4. Upon information and belief, over 25 million people rely upon these water bodies as a source of drinking water.
5. The Division finds the degradation of these water bodies is an unacceptable and imminent threat to human health under NRS 445A.305, NRS 459.400, NAC 445A.144.
6. Upon information and belief, Tronox may seek to abandon the Henderson Site after a sale of its assets in bankruptcy. The abandonment of the Site, and/or any loss of power or disabling of the GWTS will cause an imminent and substantial threat to human health. Tronox must present a plan to the Division demonstrating the continuation of the GWTS system, including an emergency

generator back-up system for the GWTS, or an alternate plan that is acceptable to the Division.

III. CONCLUSION: Based upon the information set forth herein, the Nevada Division of Environmental Protection has determined that Tronox, LLC is in violation of the following provisions of the Nevada Administrative Code (NAC), the Nevada Revised Statutes (NRS), the Resource Conservation and Recovery Act (RCRA), and Division Administrative Orders on Consent.

1. NAC 445A.227, 445A.2271, 445A.22725, 445A.2273, and NRS 459.565. Failure to complete required assessments and reports of the effectiveness of the pump and treat groundwater system ("the GWTS").
2. Phase 2 Consent Order, Section III. Parties Bound.
3. Phase 2 Consent Order, Section IV. Work To Be Performed.
4. Phase 2 Consent Order, Section XVII. Reimbursement of Division Oversight Costs.
5. RCRA §§ 3004(u) and 3008(h) and 40 C.F.R. Part 265, Subpart H. Financial Assurance.
6. 1986 Consent Order, paragraph 28. Financial Assurance.
7. NRS 445A.465. Allowing pollutants discharged from a point source or fluids injected through a well to remain in place where the pollutants or fluids could be carried into the waters of the State by any means.
8. NRS 445A.305, NRS 459.400, NAC 445A.144. The Division has a duty to address the imminent and substantial threat to human health and the environment caused by the Site.

Dec 14, 2009
Date


James Najima, Chief
Bureau of Corrective Actions

General Engineering
Contractors
Since 1958



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(702)251-5800
(702)251-1968 Fax
www.LasVegasPaving.com

February 7, 2011

Clark County Development Services
4701 W. Russell Road
Las Vegas, Nv 89118

Attn: "Permit Issue"
Application # 10-33981
Project Address: 560 W. Lake Mead Pkwy.

Danny Fitzgerald (Construction Manager) is an authorized employee of Las Vegas Paving for the TRONOX Soil Remediation project and has permission to use check number **10-33981** from "Las Vegas Paving Corp" to pick up permit number stated above using our state contractor's license number #5507 Class AB...

Thank you,

A handwritten signature in black ink, appearing to read "Jay Smith", is written over a light blue horizontal line.

Jay Smith
President
Las Vegas Paving Corp.



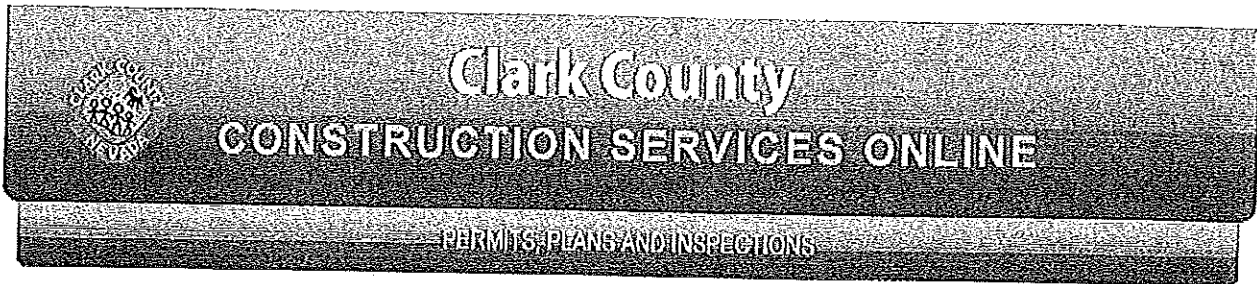
- HOME
- SELECT PERMIT
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- SCHEDULE/CANCEL INSPECTIONS
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- CORRECTION LETTERS
- LOGOFF

Plan Tracking Status

Parcel ID: 178-13-501-001 Address: 560 W LAKE MEAD PKWY
 Application Date: 12/06/10 Owner: TRONOX L L C
 Application #: 10 - 33981 Application Type: GRADING-COMMERCIAL

Agency Description: PLAN TRACKING
 Action Description: FEE WORK-UP COMPLETED

Comment
ready to issue/1465.99 due/need dust permit/thn



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- CORRECTION LETTERS
- LOGOFF

Application Fees

Parcel ID: 178-13-501-001 Address: 560 W LAKE MEAD PKWY
 Application Date: 12/06/10 Owner: TRONOX L L C
 Application #: 10 - 33981 Application Type: GRADING-COMMERCIAL

Fee Description	Amt Charged	Amt Due
ZONING PC FEE	\$133.27	\$133.27
GRADING PLAN REVIEW-BLD	\$413.40	\$0.00
GRADING 100,001-OR MORE CY (000-000/GD6-00)	\$1,332.72	\$1,332.72
TOTAL	\$1,879.39	\$1,465.99