

March 19, 2007

Ms. Susan Crowley
Tronox LLC
PO Box 55
Henderson, Nevada 89009

Re: **Tronox LLC (TRX)**
NDEP Facility ID #H-000539
Nevada Division of Environmental Protection Response to:
Community Involvement Plan
dated March 14, 2007

Dear Ms. Crowley,

The NDEP has received and reviewed TRX's report identified above and provides comments in Attachment A. Please respond to the NDEP's comments with a response-to-comments letter or in a meeting. These issues can be discussed in person or via telephone. Please respond **by April 2, 2007**.

If there are any questions please do not hesitate to contact me.

Sincerely,

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

CC: Jim Najima, NDEP, BCA, Carson City
Shannon Harbour, NDEP, BCA, Las Vegas
Todd Croft, NDEP, BCA, Las Vegas
Keith Bailey, Tronox, Inc, PO Box 268859, Oklahoma City, Oklahoma 73126-8859
Sally Bilodeau, ENSR, 1220 Avenida Acaso, Camarillo, CA 93012-8727
Barry Conaty, Akin, Gump, Strauss, Hauer & Feld, L.L.P., 1333 New Hampshire Avenue, N.W.,
Washington, D.C. 20036
Brenda Pohlmann, City of Henderson, PO Box 95050, Henderson, NV 89009
Mitch Kaplan, U.S. Environmental Protection Agency, Region 9, mail code: WST-5,
75 Hawthorne Street, San Francisco, CA 94105-3901
Rob Mrowka, Clark County Comprehensive Planning, PO Box 551741, Las Vegas, NV, 89155-
1741
Ranajit Sahu, BRC, 311 North Story Place, Alhambra, CA 91801
Rick Kellogg, BRC, 875 West Warm Springs, Henderson, NV 89011
Craig Wilkinson, TIMET, PO Box 2128, Henderson, Nevada, 89009-7003
Kirk Stowers, Broadbent & Associates, 8 West Pacific Avenue, Henderson, Nevada 89015
George Crouse, Syngenta Crop Protection, Inc., 410 Swing Road, Greensboro, NC 27409
Nick Pogoncheff, PES Environmental, 1682 Novato Blvd., Suite 100, Novato, CA 94947
Lee Erickson, Stauffer Management Company, P.O. Box 18890, Golden, CO 80402
Chris Sylvia, Pioneer Americas LLC, PO Box 86, Henderson, Nevada 89009
Paul Sundberg, Montrose Chemical Corporation, 3846 Estate Drive, Stockton, California
95209
Joe Kelly, Montrose Chemical Corporation of CA, 600 Ericksen Avenue NE, Suite 380,
Bainbridge Island, WA 98110

Attachment A

1. General comment, please add Shannon Harbour, NDEP, Las Vegas as a CC to all future correspondence.
2. Section 3.0, page 3, general comment, perhaps TRX should include a section which discusses public notifications. Occasionally, it may be necessary to post a notice in the local newspapers or through another media outlet. Additionally, it may be necessary to distribute a mailing to a suitable list of stakeholders. Both of these items should be considered. It is suggested that TRX review the approved Basic Remediation Company CIP or the Stauffer/Montrose CIP.
3. Section 3.1, page 3, the NDEP would like to note that TRX should feel free to provide suggestions to the NDEP if there are documents that TRX believe would be helpful to post on the NDEP website.
4. Section 3.4, page 4, the NDEP has the following comments:
 - a. There are a number of issues with the current repository as follows:
 - i. The repository is not large enough to contain all of the documents that are submitted.
 - ii. The repository does not maintain any sort of cataloging system for documents that are submitted.
 - iii. The repository is frequently pilfered. Documents are stolen wholesale or in parts.
 - b. The NDEP believes that the current repository does not fulfill the needs of a Community Involvement Plan. TRX should explain how the above issues will be addressed or should consider participation in the new repository being established by Basic Remediation Company.