



STATE OF NEVADA
Department of Conservation & Natural Resources
DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Allen Biaggi, Director

Leo M. Drozdoff, P.E., Administrator

January 7, 2010

Susan Crowley (Contractor)
C/O Tronox LLC
PO Box 55
Henderson, NV 89009

Re: **Tronox LLC (TRX)**
NDEP Facility ID #H-000539
TRX Sale Parcels A through K

Dear Ms. Crowley,

NDEP is concerned with the delays in the investigation and remediation of the aforementioned parcels. NDEP has summarized the current status of each parcel below.

1. Parcels A and B, No Further Action determination issued by NDEP, however, this did not address soil gas and the vapor intrusion pathway. TRX had submitted an evaluation to the NDEP on November 13, 2008. NDEP provided comments to this on December 22, 2008 and TRX has not responded. Please respond to the NDEP's comments **by February 26, 2010**.
2. Parcels C, D, F, G and H, NDEP approved the Remedial Action Plan (Plan) on July 2, 2009. TRX has failed to implement this Plan. NDEP understands that TRX has recently been evaluating disposal options for these materials. Please advise the NDEP **by January 22, 2010** regarding the chosen disposal option. It is expected that the remediation, confirmation sampling will be completed expeditiously and that TRX will propose additional remediation and sampling or will request a No Further Action determination **by March 26, 2010** for each of these Parcels.
3. Parcel E, it is the understanding of the NDEP that TRX has an agreement with outside parties to operate a groundwater treatment system on this Parcel for the foreseeable future and that no investigation or remediation is planned.
4. Parcel I, this Parcel has been sold and subsequently remediated by outside parties.
5. Parcel J, TRX has never submitted documentation to the NDEP on this Parcel. Please provide a sampling and analysis plan **by February 12, 2010**.
6. Parcel K, this Parcel has never been identified, however, NDEP understands that this may be a new sale Parcel. Please confirm this matter with the NDEP **by January 22, 2010**. If Parcel K is a new sale Parcel, then please provide a sampling and analysis plan **by March 26, 2010**.



Please contact the undersigned with any questions at brakvica@ndep.nv.gov or (702) 486-2850 extension 247.

Sincerely,



Brian A. Rakvica, P.E.
Supervisor, Special Projects Branch
Bureau of Corrective Actions
NDEP-Las Vegas Office
Fax: 702-486-5733

BAR:sh:ct:s

CC: Jim Najima, NDEP, BCA, Carson City
Shannon Harbour, NDEP, BCA, Las Vegas
Carolyn Tanner, AG's Office, Carson City
Keith Bailey, Environmental Answers LLC, 3229 Persimmon Creek Drive, Edmond, OK 73013
Susan Crowley, Crowley Environmental LLC, 366 Esquina Dr, Henderson NV 89014
Mike Skromyda, Tronox LLC, PO Box 55, Henderson, NV 89009
Michael J. Foster, Tronox LLC, P.O. Box 268859, Oklahoma City, OK 73126-8859
Tom Reed, Tronox LLC, P.O. Box 268859, Oklahoma City, OK 73126-8859
Deni Chambers, Northgate Environmental, 300 Frank H. Ogawa Plaza, Suite 510, Oakland, CA 94612
Barry Conaty, Holland & Hart LLP, 975 F Street, N.W. Suite 900, Washington, D.C. 20004
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
Ebrahim Juma, Planning Manager, Air Quality and Environmental Management, 500 S. Grand Central Pkwy, 1st floor, P.O. Box 555210, Las Vegas, NV 89155-5210
Ranajit Sahu, BRC, 311 North Story Place, Alhambra, CA 91801
Rick Kellogg, BRC, 875 West Warm Springs, Henderson, NV 89011
Mark Paris, Landwell, 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
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
Jeff Gibson, AMPAC, 3883 Howard Hughes Pkwy, Ste 700, Henderson, NV 89169
Larry Cummings, AMPAC, 3883 Howard Hughes Pkwy, Ste 700, Henderson, NV 8916