

Matthew Paque Associate Staff Counsel (405) 775-5443 Matt.paque@tronox.com

January 10, 2011

Shannon Harbour Bureau of Corrective Actions Nevada Division of Environmental Protection 901 South Stewart Street, Suite 4001 Carson City, NV 89701

Re: Tronox LLC (TRX)

NDEP Facility ID #H-000539

Release of Process Wastewater on December 9, 2010

Dear Ms. Harbour,

On December 9, 2010 Las Vegas Paving, a contractor completing remedial soil removal at the Henderson TRX plant site, lifted a steel protective plate from its position covering transfer lines for non-hazardous process wastewater. As the plate was lifted, damage was done to several of these lines resulting in a release of approximately 2000 gallons of non-hazardous material. The release was quickly addressed and the material sampled to confirm the non-hazardous nature. The analytical reports are attached.

Per your December 14, 2010 letter to Tronox, listed below is information related to the release as indicated in Attachment A of your letter; however, please note that the release was non-hazardous in nature.

1. Description of the release

- a) Material released: water from processes; i.e. cooling tower blow-down, steam boiler blow-down, product wash water, etc; please see attached analytical report and contractor incident report for description of wastewater
- b) Release volume: approximately 2000 gallons
- c) Release date: December 8, 2010 approximately 4:45 pm
- d) Cause: damage done to transfer lines while working in the vicinity
- e) Preventative measures: the area was isolated with caution tape and soil berms to minimized the affected area; please see the attached contractor incident report
- f) No fire, vapor or explosion hazard present
- g) Injuries: none
- h) No hazardous substances released

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2. Description of Site Conditions

- a) Location: latitude 36°02'32" longitude 114°59'59" as indicated in the permit NEV2001516
- b) Property owner: Tronox LLC, 560 West Lake Mead Pkwy, Henderson, NV 89015
- c) Scaled drawing of the release location: please see attached contractor incident report figures

3. Sample results

- a) Sample test results: please see the attached analytical and contractor incident report
- b) Sample location: please see attached contractor incident report figures

4. Description of clean-up activities

- a) Contractor information: please see attached contractor incident report form
- b) Abatement description: please see attached contractor incident report form
- c) Extent: please see attached contractor incident report figures
- d) Sample collection procedure: please see attached contractor incident report
- e) Additional proposed characterization: none
- f) Scaled drawing of release: please see attached contractor incident figures

Please feel free to call Susan Crowley (702) 592-7727 if you have any questions regarding this information. Thank you.

Sincerely,

Matthew Paque

Associate Staff Counsel

Attachments: Test America Analytical Report
Las Vegas Paving Contractor Incident Report

cc: Deni Chambers, NGEM
Susan Crowley, CE/NGEM
Jeffrey Erwin, NDEP
Steve Schafer, ERG
Michael Skromyda, Tronox
Louis Spahn, LVP
Rick Stater, Tronox

Derrick Willis, NGEM