

# TRONOX

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April 9, 2010

Ms. Shannon Harbour  
Special Projects Branch  
Bureau of Corrective Actions  
Nevada Division of Environmental Protection  
2030 E. Flamingo Road, Suite 230  
Las Vegas, NV 89119

Re: Tronox Henderson Site Remediation  
Tronox LLC, Henderson, NV: NDEP Facility ID # H-00539

Dear Ms. Harbour,

In the regular weekly Tronox project conference call this morning, three subjects were discussed which require formal notification to NDEP. This letter addresses the three issues:

1. Extension of time to complete initial Parcel remediation to April 26, 2010;
2. Modification of the dioxin screening analysis to be used in pre-confirmation work, which will not impact scheduled completion of the work; and
3. Notice that Tronox is rebidding transportation of manganese tails due to contractor issues, but not anticipated to impact completion of the tails removal.

Details for each issue are provided below.

1. Extension of time to complete Parcel remediation

Tronox has completed initial excavation work on Parcels F and H and is nearly complete on Parcel G (original polygon is remediated, but the area is being extended by about 14 feet to complete the parcel). The excavation contractor has mobilized onto Parcels C and D (and will return to Parcel G when C/D is complete). Confirmation samples have been collected for Parcels F, G, and H.

While work is progressing, several days were lost to windy conditions making it impossible to meet our planned April 7, 2010 completion date. We expect that about one week of work remains to complete initial remediation of all five Parcels (C, D, F, G, and H), however, the weather forecast for early next week calls for windy conditions, which may preclude truck loading. We request an extension of the initial Parcel excavation schedule to complete work by April 26, 2010. If any of the confirmation samples show incomplete remediation, additional time will be required to re-excavate those areas.

2. Modification of dioxin screening analysis method.

In the Revised Pre-confirmation Sampling Work Plan (March 25, 2010) Tronox proposed to perform dioxin screening using EPA Method 4025, followed by Method 8290 for confirmation of the screening results. We had initially expected to utilize a mobile laboratory to perform the screening tests on a "pass/fail" basis. Subsequent discussions with Test America Laboratories indicates they can use Method 8290M as a screening test in their fixed lab and provide both rapid turn around and high capacity at virtually the same cost as screening Method 4025. Method 8290M also offers the benefit of providing quantification of the analysis rather than a "pass/fail" result.

The 8290M screening method was utilized in the Tronox Phase A Site Investigation and proved to provide slightly higher results than the full Method 8290 analysis. The screening method is therefore conservative. We propose to simply replace the Method 4025 analysis with the Method 8290M analysis in the sampling program. If NDEP would prefer, Tronox can provide errata pages for the pre-confirmation sampling tables.

3. Notice of Replacement of Manganese Tailings Transport Contractor.

After several late submissions and questions regarding contractor licensing in the State of Nevada, Northgate Environmental Management this morning recommended to Tronox that the contractor be replaced. Northgate will issue rebid packages for the tailings transportation contract later today, with bids due April 16, 2010. The revised bids will be structured to complete the manganese tailings excavation/transport by the July 19, 2010 deadline in the current project schedule.

We appreciate your assistance with the project. If you have questions regarding any of these three issues, please give me a call at (405) 775-5443 or call Keith Bailey (405-216-9213) or Susan Crowley (702-592-7727).

Sincerely,



Mathew Paque  
Staff Counsel

cc:

Keith Bailey - Environmental Answers LLC  
Ken Baker - Chartis  
Deni Chambers - Northgate Environmental Management  
Susan Crowley - Crowley Environmental  
Julie Diebenow - Chartis Cost Cap Monitoring Group  
Roy Widmann - Tronox  
Derrick Willis - Northgate Environmental Management