

environmental management, inc.

November 19, 2010

Shannon Harbour, P.E. Nevada Division of Environmental Protection 901 South Stewart Street Carson City, Nevada 89701

Subject: Revised Environmental Covenants, Institutional and Engineering Controls Plan Tronox Facility, Henderson, Nevada

Dear Ms. Harbour:

Please find attached Revised Environmental Covenants, Institutional and Engineering Controls Plan prepared by Northgate Environmental Management, Inc. on behalf of Tronox LLC (Tronox).

I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and, to the best of my knowledge, comply with all applicable federal, state and local statutes, regulations and ordinances.

Please contact us if you have any comments or questions concerning this correspondence. Thank you.

Sincerely,

Northgate Environmental Management, Inc.

Deni Chambers, CEM

Deni Chambus

Principal-in-Charge

Project CEM

Federal Express

CC: Shannon Harbour, NDEP

William Knight, NDEP

Jim Najima, NDEP

Kelly Black, Neptune

Paul Hackenberry, Hackenberry and Associates

Teri Copeland, Neptune

Joanna Otani-Fehling, Neptune

Kurt Fehling, The Fehling Group

Joe McGinley, McGinley and Associates

Roy Widmann, Tronox

Keith Bailey, Environmental Answers

Susan Crowley, Crowley Environmental

Ed Krish

Deni Chambers, Northgate

Derrick Willis, Northgate

Electronic Copy

CC: Greg Lovato, NDEP

Dave Gratson, Neptune

Matt Paque, Tronox Counsel

Rick Stater, Tronox

Michael Skromyda, Tronox

Ken Baker, Chartis

Julie Diebenow. Chartis

Brenda Pohlmann, COH

Barry Conaty, COH Counsel

Mark Paris, BMI

Lynne Preslo, Montrose

Brian Waggle, Montrose

Mitch Kaplan, EPA

Victoria Tyson, Timet

Craig Wilkinson, Timet

Nick Pogoncheff, Stauffer

Lee Erickson, Stauffer

Joe Kelley, Montrose

Paul Sundberg, Montrose

Curt Richards, Olin

Michael Belotti, Olin

Brian Rakvica, McGinley & Assoc.

Ed Modiano, de maximis

Barry Giroux, GEI

Jeff Gibson, AmPac

Kirk Stowers, Broadbent

Ranajit Sahu, BMI

George Crouse, Syngenta

