



environmental management, inc.

January 24, 2011

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

Subject: Response to NDEP letter regarding observations of debris dated January 21, 2011
Tronox Facility, Henderson, Nevada

Dear Ms. Harbour:

On behalf of Tronox LLC (Tronox), Northgate Environmental Management Inc. (Northgate) is responding to your letter of January 11, 2011 regarding observations of debris on the Tronox site (the Site). The material referenced in your letter is asphalt debris and was encountered while trenching to install conveyance pipelines in remediation polygon Remediation Zone (RZ) -D-25A (on the east side of the Site). In accordance with the *Excavation Plan for RZ-D*, the polygon is scheduled to be excavated to a depth of 3 feet. It is Tronox's intent to address the debris following the same guidelines already used to deal with visible soil staining in the RZs. If the debris does not extend below the bottom of the planned polygon, the excavation will be completed as planned. If asphalt debris extends below the planned depth, excavation will continue and the debris will be removed. We propose that the analytical suite be limited to semi-volatile organic compounds given the nature of the material, and we will utilize procedures as referenced in the *Revised Pre-Confirmation Sampling Work Plan, dated March 25, 2010*.

Please let us know if you have any questions on this matter.

Sincerely,
Northgate Environmental Management, Inc.

A handwritten signature in blue ink that reads 'Deni Chambers'.

Deni Chambers, CEM
Principal-in-Charge