TRONOX

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November 1, 2005

Mr. Todd Croft Supervisor Nevada Division of Environmental Protection 1771 East Flamingo – Suite 121A Las Vegas, NV 89119

Re: 2005 AOC Monthly Progress Report for October 2005

Dear Mr. Croft,

This monthly progress report fulfills requirements laid out in the April 12, 2005 Administrative Order On Consent (2005 AOC) between the State of Nevada, Department of Conservation and Natural Resources, Division of Environmental Protection (NDEP) and Kerr-McGee Chemical LLC (now Tronox LLC).

Activities this month:

- All bids on construction of the Effluent Clarity / AP-5 treatment system have been received.
 Contractors have been selected and a contract is being negotiated. The proposed preliminary
 construction schedule, submitted with the bid packages, calls for project completion about six
 months following contract signing.
- An internal Authorization for Expenditure (AFE) document has been prepared to approve project funding. The AFE is now being circulated for management approval.
- 3. Modification of the Tronox LLC Henderson facility air permit has been requested to increase the allowable usage of ethanol and lime for the expanded biological treatment plant process.
- 4. Regarding the AP-5 pond solids handling project, solids washing proposals have been received from two firms to remove residual perchlorate from insoluble pond solids (diatomaceous earth and cellulose filter aids) prior to landfilling the solids. Both proposals will require additional testing to finalize the approaches. The testing will be conducted within the next few months and will be done independently of the bioplant construction work to avoid slowing the project schedule.
- 5. Full scale testing of the US Filter BIOXIDE odor control process has successfully reduced odors from the bioplant sludge treatment area. A proposal for long-term commercial application has been requested.

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If you have questions or comments on this report, please call me at (702) 651-2234 or call Keith Bailey at (405) 270-3651. Thank you.

Sincerely,

Susan Crowley

Staff Environmental Specialist

Tronox LLC

CC: Keith Bailey (Trx)

Mary Cheung (Veolia)

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