

From: Deni Chambers, CEM
Derrick Willis, CEM
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Date: December 16, 2010

To: Shannon Harbour, PE
Nevada Division of Environmental Protection (NDEP)

RE: Remediation Zone C Excavation of Perchlorate-Impacted Soils
Tronox LLC, Henderson, Nevada

On behalf of Tronox LLC (Tronox), Northgate Environmental Management, Inc. (Northgate) submits this letter to confirm our understanding regarding excavation of perchlorate-impacted soil (above Basic Comparison Levels; BCLs) proposed in Remediation Zone (RZ) -C in the vicinity of the retention basins. Your letter dated December 10, 2010 requires excavation of soil to depths of up to 10 feet where Tronox has proposed flushing to remove perchlorate. In areas such as RZ-C-28, where a 10-foot deep retention basin is included in the grading plan, our understanding is that we will remove up to 10 feet of soil from the current grade. This will leave areas at the bottom of the retention pond with some perchlorate concentrations exceeding BCLs. These areas will be remediated by subsequent flushing as water collects in the retention basin.

In the December 10, 2010 letter, NDEP also requested that Tronox proceed with pilot testing of soil flushing. Tronox plans to test flushing as an in-Situ treatment technology for treatment of leachable chemicals. Tronox had planned the test for polygon RZ-C-29; however, the required excavation may necessitate a slight modification of the pilot test plan, which will be evaluated and discussed with NDEP as appropriate.

We would appreciate your comments on this matter as soon as is possible to meet the project schedule. Please contact us if you have any questions on this matter.

