

# TRONOX

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February 28, 2010

Mr. Jim Najima  
Chief, Bureau of Corrective Action  
Nevada Division of Environmental Protection  
901 S. Stewart Street, Suite 4001  
Carson City, NV 89701

Re: Order to Tronox Dated December 14, 2009

Dear Mr. Najima,

This letter summarizes Tronox LLC's plan to supply emergency electrical power to its biological treatment facility located in Henderson, Nevada. As indicated verbally in our February 2, 2010 "Show Cause" meeting, and in our written response to your Order dated January 27, 2010, emergency electrical supplies are available for the Tronox biological treatment plant. In our weekly calls with Brian Rakvica and Shannon Harbour, it has been indicated that a separate letter dealing with the electric power issue would be helpful. Accordingly, we are providing this letter.

The Tronox biological treatment plant is supplied with electrical power through a substation fed from the Tronox plant. Should power to the bioplant be interrupted, connections are available at the bioplant substation to allow hook-up of a diesel powered motor generator system. This would protect the "microbial culture", ensure that the biological reactor fluidization is maintained, and avoid the situation described on page 18 of the Order. Tronox has previously utilized a rental generator to operate the bioplant when an overhead power line was replaced.

Several firms offer large rental generators in the Las Vegas area and Tronox contacts with those firms indicate they can easily supply a generator capable of powering the bioplant within a few hours. In the very unlikely event that local generators could not be provided, the firms have the capability to bring in generators from California or Arizona.

As a back-up to the back-up generator plan, Tronox also maintains several smaller portable generators on the plant Site which could be utilized to supply partial power to the bioplant in an emergency. While these smaller generators would not provide full operational power for the bioplant, they would be sufficient to power the plant control systems (including an instrument air compressor) and several of the bioplant fluidization pumps. This would maintain the microbial culture for months if necessary.

I hope this information is helpful. If you have questions regarding this letter, please give me a call at (405) 775-5443.

Sincerely,

A handwritten signature in black ink, appearing to read 'M Paque', with a long horizontal stroke extending to the right.

Mathew Paque  
Associate Staff Counsel

cc:

Keith Bailey - Environmental Answers LLC  
Susan Crowley - Crowley Environmental  
Julie Diebenow - Chartis Cost Cap Monitoring Group  
Toni Ellington - Tronox  
Shannon Harbour - NDEP  
Mike Logan - Tronox  
Brian Rakvica - NDEP  
Tom Reed - Tronox