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May 4, 2010

Ms. Shannon Harbour, P.E. Nevada Division of Environmental Protection 2030 East Flamingo Road, Suite 230 Las Vegas, Nevada 89119-0818

Subject: Removal Action Work Plan for Phase B Soil Remediation of Remediation Zones RZ-B through RZ-E Tronox LLC, Henderson Nevada: NDEP Facility ID # 000539

Dear Ms. Harbour:

Please find attached a revised Removal Action Work Plan for Phase B Soil Remediation Zones RZ-B through RZ-E (RAW) prepared by Northgate Environmental Management, Inc. on behalf of Tronox LLC (Tronox). The RAW and its appendices have been revised based on the NDEP comments. Additionally, Appendix G, a discussion of the Historic Manganese Tailings Pile, and Appendix H, Environmental Covenants have been added to the RAW. As requested in NDEP's comments, dated April 19, 2010, we have provided an annotated Response to Comments.

Please contact me at (702) 592-7727 if you have any comments or questions concerning this correspondence. Thank you.

Sincerely,

Smilowlug.

Susan M. Crowley, CEM 1428, exp 3-8-11

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CC: Shannon Harbour, NDEP Jim Najima, NDEP BMI Compliance Coordinator, NDEP Paul Black, Neptune Paul Hackenberry, Hackenberry and Associates Teri Copeland, Neptune Joanne 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

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