

Susan Crowley CEM-1428 (702) 651-2234 Fax (405) 302-4607 susan.crowley@tronox.com

June 10, 2010

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

Subject: Excavation Plan for Phase B Soil Remediation of RZ-B Tronox LLC, Henderson Nevada: NDEP Facility ID # 000539

Dear Ms. Harbour:

Please find attached *Excavation Plan for Remediation Zone B* (EP) prepared by Northgate Environmental Management, Inc. on behalf of Tronox LLC (Tronox). This *Excavation Plan* is an addendum to the *Removal Action Work Plan* (RAW) that was issued on May 12, 2010 and approved by the Nevada Division of Environmental Protection (NDEP) on May 12, 2010.

The Remediation Zone EP cut-lines are based on Phase A, Phase B, and pre-confirmation sampling results, as well as conceptual site model (CSM) assessments. Given that step-out sampling is not yet complete and we have not discussed with NDEP our CSM assessment, we consider the excavation boundaries preliminary and subject to change. Tronox would like to meet with NDEP at your earliest convenience to discuss our approach to development of our excavation plans.

I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and, to the best of my knowledge, comply with all applicable federal, state and local statutes, regulations and ordinances.

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

Sincerely,

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

Shannon Harbour Page 2

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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 Joanna 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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CC: Greg Lovato, NDEP Dave Gratson, Neptune Matt Pague, Tronox Counsel Rick Stater, Tronox Michael Skromyda, Tronox Ken Baker, Chartis Julie Diebenow, Chartis Brenda Pohlmann, COH Barry Conaty, COH Counsel Mark Paris, BMI Lynne Preslo, Montrose Brian Waggle, Montrose Mitch Kaplan, EPA Victoria Tyson, Timet Craig Wilkinson, Timet Nick Pogoncheff, Stauffer Barry Giroux, GEI Jeff Gibson, AmPac Kirk Stowers, Broadbent Ranajit Sahu, BMI George Crouse, Syngenta

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