



environmental management, inc.

September 27, 2010

Shannon Harbour, P.E.
Nevada Division of Environmental Protection
901 South Stewart Street
Carson City, Nevada 89701

Subject: Errata to *Addendum to the Excavation Plan for RZ-D*, Concerning Set-Backs for GW-11 and WC Pond Embankments and Changes to the Proposed Excavation Areas, Tronox Facility, Henderson, Nevada, dated August 31, 2010

Dear Ms. Harbour:

Northgate Environmental Management, Inc. (Northgate) on behalf of Tronox, LLC has prepared this Errata to the *Excavation Plan for Phase B Remediation of RZ-D* (EP) at the Tronox, LLC (Tronox) facility located in Henderson, Nevada (the Site). The EP is an addendum to the *Removal Action Work Plan for Phase B Soil Remediation of Remediation Zones RZ-B through RZ-E* (RAW), was issued on May 4, 2010 (Northgate, 2010a) and approved by the Nevada Division of Environmental Protection (NDEP) on May 12, 2010.

Tronox has reviewed NDEP's comments concerning the proposed set-backs and has participated in discussions the Contractor regarding temporary sloping. Based on this new information, Tronox has revised the proposed set-backs for excavations adjacent to the pond embankments. The features of Tronox's proposed set-backs are as follows:

- For those excavations that are three feet or less in depth: The slope of the embankment will be extended downward beginning at the toe of the slope to the bottom of the excavation at the existing slope inclination (approximately 3 horizontal to 1 vertical) to the proposed excavation depth; and
- For those excavations deeper than three feet: The recommended set-back is 30 feet from the toe of slope to the top of the cut slope. The cut slope will be 1.5 horizontal to 1 vertical (proposed by the Contractor) to the design depth of the excavation.

These proposed measures will essentially reduce the setback for excavations three feet or less in depth to zero. For deeper excavations, the proposed measures will start a uniform distance from the toe of the berm. This will simplify the construction and reduce the previously proposed set-back by

five feet horizontally, thereby removing more soil from the set-back zone. These proposed changes have been incorporated into the attached EP Plan Sheet 1, "RZ-D Excavation Areas and Nature and Extent of Contamination." The plan sheet also has been updated to reflect the new chemical data received through September 23, 2010. Incorporation of the new data and input from NDEP has resulted in the addition of five additional excavation areas (RZ-D-6A, -8A, -10B, -11B, and -17C). In addition areas RZ-D-01B, -01D, -2, -3, -4, -4A, -5, -7, -10, -10A, -11, -11A, -15, -16, -21A, -21B, -21D, -21E, -21F, -22, -23, -23A, -24A, -26, -27, and -28 have been revised based on the new proposed set-backs, the new analytical data, and input from NDEP. The depth of excavation area RZ-D-30 is now defined by the new data and is now an excavation depth of one foot. The new chemical data is shown in blue on the attached Figure 1 for easier review.

During a telephone conference call on September 27, 2010, NDEP raised a question concerning sample location RSAI7. Although this sample indicates that dioxin was present in excess of comparison criteria, Tronox did not propose a polygon in this location. The reason, as discussed on the call, was that this location is at the toe of the embankment slope and is near an existing fence marking the edge of the BMI haul road. It is Tronox's intent to cap the entire slope up to the edge of the fence with an engineered cap as part of the proposed engineering controls. As requested the boundary of Parcel C has been added to Plan Sheet 1 for clarity.

Please review the attached figure and provide Tronox with your comments at your earliest convenience. If you have any questions, please contact us at (510) 839-0688 ext. 201.

Sincerely,
Northgate Environmental Management, Inc.



Deni Chambers, CEM,
Principal-in-Charge



Ted Splitter, P.E. CEM
Principal Engineer

Attachment:

Figure 1 - RZ-D Excavation Areas and Nature and Extent of Contamination

