



environmental management, inc.

November 18, 2010

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

Subject: Technical Memorandum: Calculation of Leaching-Based, Site-Specific Levels (LSSLs) for the Soil-to-Groundwater Pathway Using NDEP Guidance, Tronox LLC, Henderson Nevada: NDEP Facility ID # 000539

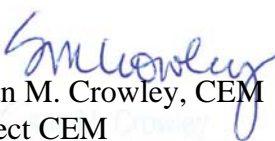
Dear Ms. Harbour:


Please find the attached *Technical Memorandum: Calculation of Leaching-Based, Site-Specific Levels (LSSLs) for the Soil-to-Groundwater Pathway Using NDEP Guidance*, prepared by Northgate Environmental Management, Inc. on behalf of Tronox LLC (Tronox). The memorandum includes a revision of the September 9, 2010 Technical Memorandum, which addresses NDEP's October 12 letter regarding background issues. Also included in this memorandum is a Response to Comments in Attachment 1 and Attachment 2 provides a revised background comparison and selection of COPCs for the leaching evaluation.

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 let us know if you have any questions on this matter.

Sincerely,  
Northgate Environmental Management, Inc.

  
Susan M. Crowley, CEM  
Project CEM

  
Deni Chambers, CEM,  
Principal-in-Charge