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October 29, 2010

SENT VIA EMAIL

Shannon Harbour, P.E. Special Projects Branch Bureau of Corrective Actions NDEP-Carson City Office 901 S Stewart St Carson City, NV 89701

RE: Excavation Schedule

Ms. Harbour,

Below you will find Tronox's response to your October 28, 2010 inquiry regarding the current excavation schedule. Tronox and its contractors have been working tirelessly to ensure that the soil remediation work is completed by the end of the year to meet requirements of the December 2009 FOAV and Order.

Over the past week we have been working through certain issues that we are hopeful will be resolved over the next week. Derrick Willis of NGE LLC will be present on-site to work closely with contractors to expedite the activities.

1. Why is excavation work slowing down and shifts being eliminated?

RESPONSE: We have been assured by our contractor that they are moving as efficiently as possible. Shifts and equipment for excavation and hauling will continue to be modified based on type of excavation and anticipated volumes available to maximize efficiency. Saturday shifts are continuing based on resolution of utility access issues in RZ-B.

2. Given the current haul rate and number of cubic yards per day, what is the projected completion date for RZ-D and RZ-B?

RESPONSE: RZ-D will be completed by November 15th; however, this will necessitate excavation of the polygons adjacent to the GW-11 and WC-E/W pond berms. This work will commence immediately, based on our engineers findings of the slope stability analysis (approval of the pond berm stability analysis is pending). However, the perchlorate treatment lines that are located just south of WC East/West will need to remain in place as they are proposed to remain as an environmental covenant area.

Due to logistical issues associated with both known and unknown utilities and sub-grade features in RZ-B, and the specialized personnel required for removal of debris in the Unit Building 2 basement, RZ-B will not be completed by November 15th. RZ-B will be completed prior to the end of the year and will run concurrently with excavation of other remediation zones. As mentioned above, it is anticipated that the work in RZ-B, -C, -D and –E will be completed by the end of the year.

3. Considering that TRX has requested a delay to the end of October Milestone for the completion of RZ-D and RZ-B, why aren't additional resources (equipment) being utilized to continue hauling on a 24 hour schedule?

RESPONSE: Equipment and shifts are being matched to excavation volume. With excavation of polygons next to the pond berms being initiated, 24-hour hauling will be added back in the schedule, anticipated to start either Saturday October 30th or Monday November 1st.

4. What is TRX's path forward on the decon issues at the Site? NDEP has not observed resolution to the decon issues that have been brought to our attention.

RESPONSE: Decon issues have been addressed in the field and with the contractor. Please find attached the incident/corrective action report documenting the resolution.

Please contact me if you have any questions.

Sincerely,

Matthew A. Paque

cc: Lina Tanner Michael Foster Deni Chambers Derrick Willis Keith Bailey Susan Crowley Roy Widmann Brian Rakvica Devin Gordon William Knight Greg Lovato