



environmental management, inc.

November 30, 2010

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

Subject: Nevada Division of Environmental Protection's November 23, 2010 Response to: *TRX Letter RE: Remediation Status of RZ-D*
Tronox Facility, Henderson, Nevada

Dear Ms. Harbour:

We are writing on behalf of Tronox LLC in response to Nevada Division of Environmental Protection's (NDEP's) November 23, 2010 correspondence regarding the remediation status of Remediation Zone (RZ) – D. NDEP's letter requested clarification regarding how Tronox intends to meet the December 31, 2010 deadline for the demonstration of source control at the Tronox facility (the Site). As NDEP is aware, Tronox has significantly ramped up efforts to meet this deadline. We have been working closely with Las Vegas Paving to mobilize additional work crews and work shifts to maximize soil excavation and offsite disposal activities. We have attached a letter from Las Vegas Paving that provides their schedule to implement the remaining soil removal work.

Regarding remediation and source control in RZs –B and –D:

The bulk of the excavation and offsite disposal of impacted soil from RZ-D (approximately 240,000 thousand cubic yards) was completed by November 22, 2010. The soil removal work left in RZ-D after November 22 consisted of final grade clean-up of excavation polygons and removal of stockpiles generated during excavation of RZ-D. Excavation and stockpile removal were hampered over the weekend due to shut-downs caused by high winds (up to 60 miles-per-hour). However, all of these activities have now been completed. Additional work in RZ-D consists of addressing visually-impacted soil and soil in the vicinity of the PRP lines. Tronox has proposed a set-back for soil in the vicinity of the PRP lines and is preparing a response to NDEP's comments on this issue.

Additionally, Tronox has now received all of the recent pending laboratory data for RZ-B and RZ-D. Some minor changes to polygons are appropriate based on the new data. Final revisions to the RZ-B and -D excavation plans were submitted to NDEP on November 29 for concurrence on these revisions. Pending resolution of the above-mentioned unresolved issues, it is anticipated that all excavation and soil removal work will be completed in RZ-B and RZ-D prior to December 31, 2010. In addition, TRX intends to complete capping of the pond berms by the end of this year.

Regarding remediation and source control in RZ- C:

Site preparatory work was initiated on November 10, 2010. This work consisted of pot-holing for utility verification, moisture conditioning of the soil, and debris removal. It is anticipated that approximately 85,000 cubic yards of soil (66 % of total soil to be removed in RZ-C) will be excavated by December 31, 2010. Portions of RZ-C that are not anticipated to be complete by December 31, 2010 include areas in the vicinity of the former perchlorate production area, steam plant and some key utilities/roadways. The balance of impacted soil, located in difficult to access areas as described above, are anticipated to be excavated and removed from the site by February 4, 2011 pending any unforeseen delays.

Regarding remediation and source control in RZ- E:

Site preparatory work was initiated on November 17, 2010. This work consisted of moisture conditioning and grubbing of vegetation in anticipation of conditional approval to excavate by NDEP which was received November 29, 2010. It is anticipated that excavation and removal of impacted soil from RZ-E can be completed by December 31, 2010 pending any unforeseen delays.

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

Sincerely,
Northgate Environmental Management, Inc.



Deni Chambers, CEM
Principal-in-Charge



Derrick Willis, CEM
Project Manager

Enclosures: Attachment





Date: 30 November 2010

To: Mr. Derrick Willis
Principal
Northgate Environmental Management, Inc.

From: Tim Nelson

Re: Estimated Work Complete by 31 December 2010

Derrick,

Per the accompanying Excavation Schedule, RZ-C, D, and E, Las Vegas Paving anticipates the following:

- Completion of RZ-B excavation on or before 31 December.
- Completion of RZ-B backfill on or before 31 December.
- Completion of RZ-C excavation by 31 December, with the exception of RZ-C28 - 44.
- Completion of RZ-D excavation by 31 December with the exception of some 28,000 CY encompassed in excavation areas adjacent to PRP lines, or containing visual contamination, or pending design revision.
- Completion of an undetermined portion of backfill in RZ-D by 31 December pending design revisions.
- Completion of RZ-E excavation by 31 December.

These completion estimates assume no delays caused by design revisions, unforeseen conditions, or weather-related impacts.

Best Regards,

A handwritten signature in black ink that reads "Tim Nelson". The signature is written in a cursive, flowing style.

Tim Nelson
Construction Manager
Las Vegas Paving Corporation