

From: Deni Chambers, CEM
Derrick Willis, CEM
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Date: December 15, 2010

To: Shannon Harbour, PE
Nevada Division of Environmental Protection (NDEP)

RE: Subsurface Demarcation of Residual Contaminated Soil
Tronox LLC, Henderson, Nevada

COMMENTS:

On behalf of Tronox LLC (Tronox), Northgate Environmental Management, Inc. submits the following procedure for subsurface demarcation of areas of the Tronox facility (the Site) where proposed soil removal cannot be completed at this time due to inaccessibility. The Institutional Controls/Environmental Covenant (IC/EC) areas include locations where soil excavation access is limited and IC/ECs are proposed to minimize potential contact with contaminated soil.

The IC/EC areas shown on the attached figure include:

- I/E 2: Sodium chlorate filter cake processing area
- I/E 3: Footings for Overhead Pipe Rack
- I/E 4: Unit Building 1
- I/E 5: Unit Building 2
- I/E 6: Unit Building 3
- I/E 9: Road into Chemstar plant
- I/E 10: Steam plant – utilities and infrastructure
- I/E 12: Diesel tank and tank containment structure
- I/E 14: Nevada Energy Transmission Line towers
- I/E 15: Effluent Pipeline and Utility Corridor
- I/E 16: Equalization tanks
- I/E 17: Groundwater and WC ponds and berms
- I/E 18: Hazardous waste storage area
- I/E 19: Chemstar Road Fireline and Utilities
- I/E 20: Chemstar Road Railroad Line and Utilities
- I/E 22: 9th Street Utilities



The proposed subsurface demarcation procedures were presented during our conference call with the Nevada Division of Environmental Protection (NDEP) on December 2, 2010 and a Site meeting on December 13, 2010. Proposed procedures include marking the boundary in the subsurface where an excavation has left contaminated soil in place by laying orange plastic fencing on the excavation surface (see attached photo). The fencing will be covered by clean soil as the excavation is backfilled, and the fencing will serve as a visible indicator when contaminated soil is being encountered in future excavations.

Other measures to be taken include surveying the IC/EC Areas, installing signage and placement of other engineering controls. These measures will be detailed in the revised IC/EC plan.

We would appreciate your comments on this matter as soon as is possible to meet the project schedule. Please contact us if you have any questions on this matter.

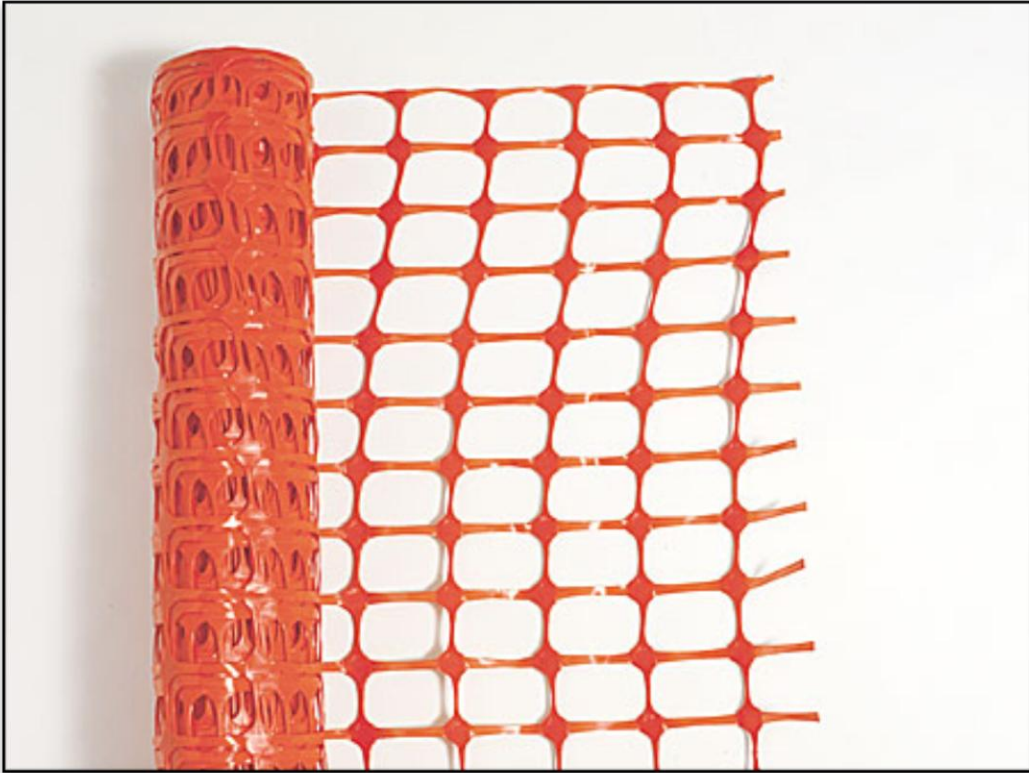
Attachments:

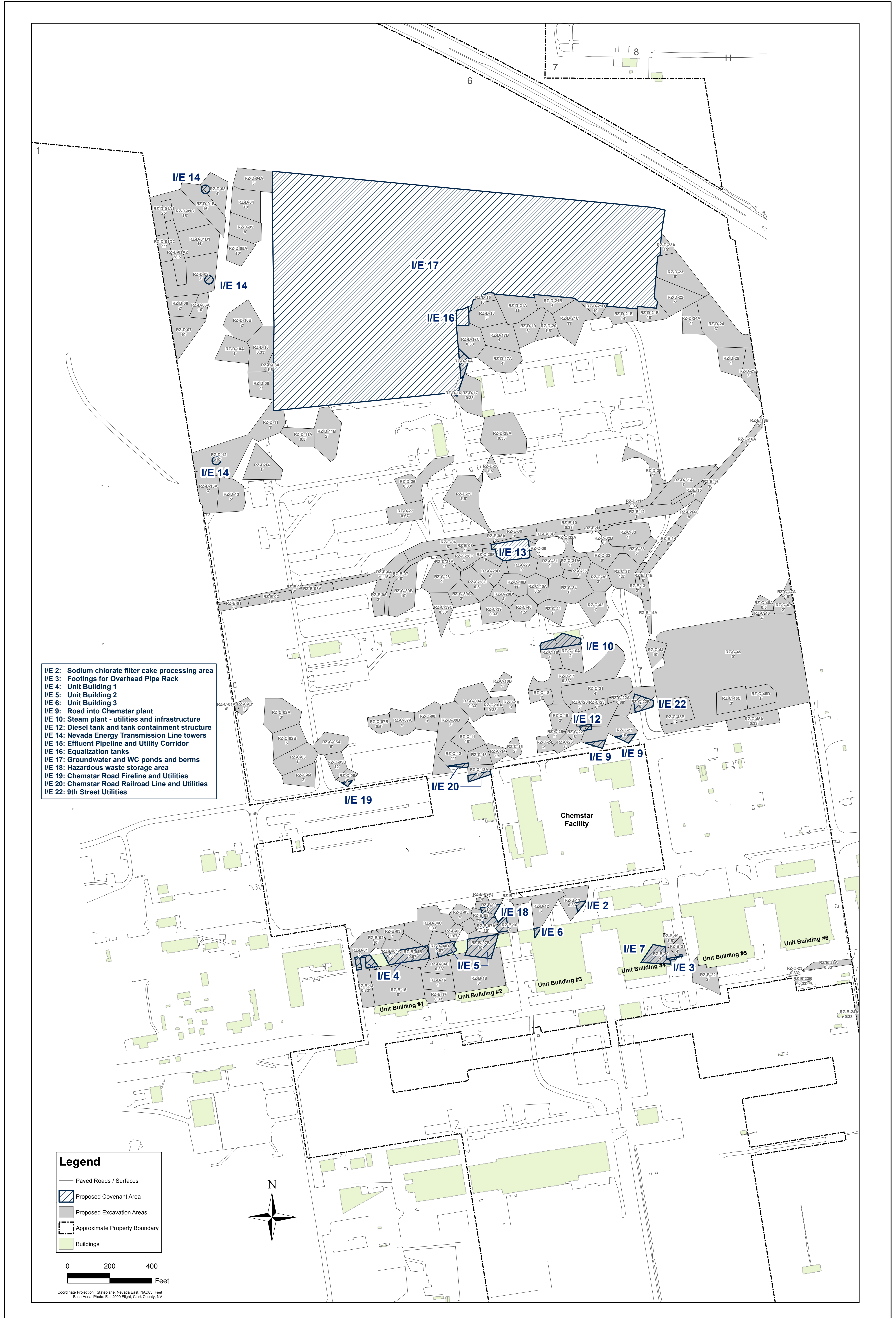
Photo - Example Orange Demarcation Fencing

Figure – Proposed Environmental Covenant Areas



**PHOTO –
Example Orange Demarcation Fencing**





SHEET NUMBER
1

FIGURE NUMBER
3

PROPOSED ENVIRONMENTAL COVENANT AREAS		
Environmental Covenants, Institutional and Engineering Control Plan Tronox LLC Henderson, Nevada		
SCALE: 1 in = 200 ft	DATE: 12/15/10	PROJECT NUMBER: 2027.07 T30

DESIGNED BY:	NO.:	REVISIONS	DATE:	BY:
AK		DESCRIPTION:		
DRAWN BY:				
MW				
CHECKED BY:				
OAS				
APPROVED BY:				
AK				

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