Meeting Minutes

Project: Tronox (Trx)

Location: Tronox Henderson Facility **Time and Date:** 9:00 AM, Tuesday May 8, 2007

In Attendance: NDEP-BCA – Brian Rakvica, Shannon Harbour

Tronox – Keith Bailey, Susan Crowley

ENSR – Dave Gerry, Sally Bilodeau, Lisa Bradley (for Tronox)

Neptune – Paul Black, Dave Gratson (for NDEP)

Teri Copeland (for NDEP)

Hackenberry Assoc. – Paul Hackenberry (for NDEP)

CC: Jim Najima

1. The meeting was held to discuss a variety of topics including the Phase A Report and Phase B Work Plan.

- 2. Phase A data validation: TRX submitted copies of the validated data sheets to NDEP. All of the data validation reports have been completed. TRX expects the completion of the data validation summary reports by May 18th. TRX will send a copy on CD of the data validation summary reports and all lab sheets to David Gratson.
- 3. Asbestos data not finished yet. Lisa Bradley will contact Paul Black with questions regarding the reporting of the asbestos data. Discussion regarding fiber width versus biologic availability.
- 4. Phase A Report: TRX supplied an outline for the Phase A Report. The following was discussed:
 - a. TRX indicated that Section 6 will include the bases for the selection of the FA areas
 - b. Paul Black suggested that the background and upgradient data be discussed in Section 2.
 - c. Chloroform map: NDEP likes the format of the map but suggested the addition of contaminant concentrations and contaminant iso-contours. NDEP requested that any maps illustrating groundwater concentrations should include adjacent property data.
 - d. NDEP asked whether the Phase A report was going to rely on any historical data (diesel and chromium ponds data) as used in the CSM. TRX stated that the inclusion of historical data was not planned. Lisa Bradley agreed that it would be appropriate to use historical data in the Phase A report. NDEP and TRX had a discussion on whether the diesel and chromium ponds data had been validated but in a Nov '05 meeting, TRX stated that they couldn't located the support documents for validation of this data; therefore, the historical data will have to be used anecdotally in the Phase A report.
- 5. Comparison Levels: TRX supplied a draft Table 3-2 Site Related Chemicals Analyte List for Soil and Groundwater Samples for discussion.
 - a. NDEP requested the URL for the NDWR Nevada MCL referenced in Table 3-2. Lisa Bradley stated that the NV MCL regulations were supplied by NDEP.

- b. NDEP pointed out that in some cases the NV MCL was greater that the Federal MCL or a NV MCL was listed but no Federal MCL was listed.
- c. NDEP suggested that the provisional action level of 18 ug/L be used for perchlorate in groundwater. The NDEP has not determined an action level for perchlorate in soil.
- d. NDEP suggested that the screening level (Beneficial Use Standard for Las Vegas Wash) of 1,900 mg/L be used for TDS; otherwise, the more restrictive Federal secondary MCL would need to be used. TRX to propose screening level for TDS. **ACTION ITEM.**
- e. NDEP suggested adding a column in Table 3-2 for the basis for the selection of the screening level.
- f. NDEP pointed out that leaching pathway was not considered in the screening levels used in Table 3-2 and that the leaching pathway will reduce the screening level for several of the constituents such as Magnesium. TRX stated that this screening is for direct contact pathway only and that the leaching pathway will be considered separately.
- g. TRX stated that Mg was not being considered for additional characterization since it is an essential nutrient. NDEP disagreed with this logic stating that due to the toxicity level of Mg and the use of Mg as a signature constituent for characterization. The zeros listed in Table 3-2 for Mg should be replaced with "--".
- h. Background data for Arsenic will be combined at the end.
- i. TRX suggested a soil screening level for dioxin/furans on 1 ug/kg. This screening level was derived in two ways: 1) using the high point in the ASTDR residential range and 2) using one tenth 10 ug/kg, which is less than the midpoint of the OSWER directive for the industrial range.
- j. Paul Black stated that EPA Region IX is no longer maintaining the PRG database.
- 6. Evaluation Areas (EAs) for Phase B: TRX submitted a draft figure illustrating the eleven proposed EAs for the Phase B Work Plan and Report. TRX stated that the EAs are based on current, future, and historical use.
 - a. Units 4 and 5 have same process history.
 - b. EA1, EA2, EA3, and EA11 represent areas shown in Phase I report.
- 7. Paul Black requested that the x-y coordinates for each analyte be added to the database. TRX will check to see if this information is included in their database. **ACTION ITEM.**
- 8. David Gratson stated that the Data Validation Qualifiers were not used for all data sets. For example, J+/J- were only used for inorganics.
- 9. NDEP and TRX discussed the format for analytical data. NDEP has not finished review of TRX submitted format. TRX stated that their format is close to BRC's format with the additional of a few fields.
- 10. Schedule update:
 - a. Phase A report / Phase B Work Plan: End of July 2007
 - b. Phase B sampling report: October 2007
 - c. Risk Assessment: 2nd Half 2008
 - d. Next Call: 11:00 AM June 6, 2007