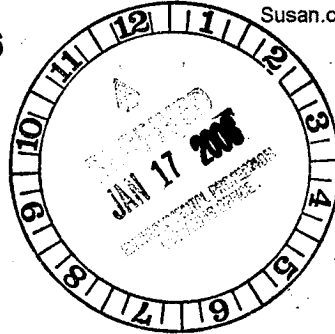


# TRONOX

Susan Crowley  
Staff Environmental Specialist

(702) 651-2234  
Fax (405) 228-6882  
Susan.crowley@tronox.com

January 13, 2006



Mr. Brian Rakvica, P.E.  
Nevada Division of Environmental Protection  
1771 East Flamingo Road, Suite 121-A  
Las Vegas, Nevada 89119

Dear Mr. Rakvica:

Subject: Tronox LLC ECA Quarterly Report – Fourth Quarter 2005

Pursuant to Section XIII of the Consent Agreement, signed September 5, 1996, between Nevada Division of Environmental Protection (NDEP) and Tronox LLC (Tronox), formerly Kerr-McGee Chemical LLC, Tronox submits the following quarterly status report for the Henderson facility's Environmental Conditions Assessment (ECA).

Activities Conducted, 10-1-05 to 12-31-05

#### Conceptual Site Model:

- October 14 – Tronox submits responses to NDEP September 6, 2005 comments on CSM.
- October 22 – NDEP comments on October 14 document
- November – Tronox receives water data on Las Vegas Wash.

#### Upgradient Investigation Work Plan:

- October 4 – Tronox submits Revised Table 6 to NDEP. NDEP provides verbal comments October 5
- October 5 – Tronox submits errata sheets to NDEP.
- October 6 – NDEP provides written comments on submittals for the Upgradient Investigation Workplan.
- October 7 – NDEP issued final meeting minutes
- October 14 – ECA Quarterly ECA Status report issued by Tronox
- November through December – Tronox works with MWH lab to define an expanded list of analytes (based upon the site-related chemical list), methods and detection limits added to Upgradient Investigation Work Plan.

#### Source Area Work Plan

- October 3, 2005 – NDEP concurs with Tronox's conceptual approach to the Source Area Work Plan, with conditions.
- October 21 – Tronox provides schedule for Source Area Phase A Work Plan
- November through December – Tronox works with MWH lab to define analytes (based upon the site-related chemical list), methods and detection limits needed for the Source Area Phase A Work Plan.

#### Fact Sheet

Tronox LLC

8000 West Lake Mead Parkway, Henderson, Nevada 89015 • P.O. Box 55, Henderson, Nevada 89009

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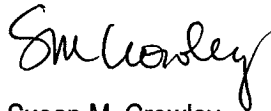
- October through December – Tronox developed and modified a Fact Sheet describing the ECA project and this undergoing internal review.

Other

- November 15 – NDEP visits Tronox site
- November 16 – NDEP and Tronox meet to discuss the ECA activities' status.
- December 16 – Tronox submits updated, revised ECA organization chart and resumes

Please note that attached is Tronox's ECA "*Deliverable Schedule*" which tracks recent activities as well as lists expectations for future activities. Feel free to call me at (702) 651-2234, if you have any questions. Thank you.

Sincerely,



Susan M. Crowley  
Staff Environmental Specialist

Overnight Mail

Cc: Public Repository  
Jeff Johnson, NDEP  
Todd Croft, NDEP  
Mitch Kaplan, EPA Region IX  
Val King, NDEP  
Jim Najima, NDEP  
Jon Palm, NDEP  
Brenda Pohlmann, COH  
Barry Conaty, COH  
Ron Sahu, BMI  
Rob Mrowka, CCCP  
Paul Sundberg, Montrose  
Al Tinney, NDEP  
Craig Wilkinson, TIMET  
Keith Bailey, Tronox  
Sally Bilodeau, ENSR  
Pat Corbett, Tronox  
Brad Dougherty, AIG  
Dana Elmer, Tronox

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Dave Gerry, ENSR  
John Hatmaker, Tronox  
Ed Krish, ENSR  
Tom Reed, Tronox  
Don Shandy, Tronox  
Rick Stater, Tronox

Attachment:

## ENVIRONMENTAL CONDITIONS ASSESSMENT - DELIVERABLE SCHEDULE

### Tronox LLC - Henderson, Nevada

Revised: January 13, 2006

Deliverable	Date
Project Organizational Chart / Resumes * Revision 1: Response to NDEP Comments of June 11, 2004 * Revision 2: Inclusion of Keith Bailey (Tronox), Robert Kennedy and Roy Hauger (ENSR).	May 15, 2004 – Submitted July 6, 2004 – Approved July 9, 2004 December 16, 2005 – Submitted
Site-Related Chemical List (Report) * Revision 1: Response to NDEP Comments of June 21, 2004 * Revision 2: Response to NDEP Comments of August 5, 2004 * Revision 3: Response to NDEP Comments of September 29, 2004	June 15, 2004 – Submitted July 22, 2004 – Submitted September 27, 2004 – Submitted October 26, 2004 – Approved October 27, 2004
Conceptual Site Model * KM Response to NDEP May 6, 2005 Comments * KM Response to NDEP September 6, 2005 Comments	February 28, 2005 – Submitted August 31, 2005 – Submitted October 14, 2005 – Submitted
Source Area Evaluation * Conceptual Approach for the Source Area Investigation * Source Area Phase A Work Plan due to NDEP	September 30, 2005 – Submitted. Approved October 3, 2005 February 28, 2006 – Pending
<b>UPGRADIENT INVESTIGATION</b>	
Background Study Work Plan * KM Response to NDEP May 6, 2005 Comments * KM Response to NDEP July 28, 2005 Comments including submittal of Upgradient Investigation Work Plan * Errata Sheets re Upgradient Investigation Work Plan * KM Response to NDEP Comments	March 30, 2005 – Submitted July 22, 2005 – Submitted September 30, 2005 – Submitted October 4, 2005 – Submitted Pending
Upgradient Investigation Field Sampling	January 30 – February 17, 2006
Upgradient Investigation Report	120 days following field sampling completion
<b>PERIODIC MONITORING AND REPORTING</b>	
ECA Phase II Status Report (Quarterly)	January 15; April 15; July 15 and October 15
Perchlorate Remediation Performance Report (Quarterly)	January 28; April 28; July 28 and October 28
Chromium Remediation Performance Report (Semi-Annually)	January 28; July 28