

TRONOX

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July 14, 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 – Second Quarter 2006

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

Activities Conducted, 04-01-2006 to 06-30-2006

Conceptual Site Model:

- CSM remains unchanged until additional data justifies revisions

Upgradient Investigation Work Plan:

- April through June – Tronox worked with MWH lab and other subcontracted labs to finalize data packages resulting from the Upgradient Investigation sampling.
- April through June – A draft *Upgradient Investigation Report* is in preparation.

Source Area Work Plan

- April through June – Tronox worked with MWH lab and others to get expanded list of analytes, methods and detection limits finalized for inclusion in the Source Area (Phase A) Workplan.
- April through June – Tronox continued to revise Source Area Workplan, based upon NDEP comments.
- April 11 – Tronox met with NDEP to discuss scope of Source Area Investigation.
- May 16 – Tronox met with NDEP to discuss revisions to the scope of Source Area Investigation.
- June 15 – Tronox met with NDEP to discuss revisions to the scope of Source Area Investigation.

Other

- April 11 – Tronox, NDEP and ENSR met to discuss the status of ECA Activities.
- April 15 – Tronox issued 1st Quarter ECA Status Report to NDEP
- April 25 – Tronox submits *Quarterly Performance Report – Perchlorate Recovery Program, January – March 2006*. (Next perchlorate performance report due on July 28, 2006).
- May 1 through May 10 – Tronox installed ART-9 collection well in the Athens Road well field, and re-developed ART-4, 4A, and 6A.
- May 16 – Tronox, NDEP and ENSR met to discuss the status of ECA Activities.

Tronox LLC

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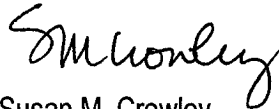
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- May 17 – Tronox presents preliminary briefing to the All-Companies Meeting attendees on the recently completed Upgradient Investigation
- June 15 – Tronox, NDEP and ENSR met to discuss the status of ECA Activities.

Please note that attached is Tronox's ECA "*Deliverable Schedule*". Feel free to call me at (702) 651-2234, if you have any questions. Thank you.

Sincerely,



Susan M. Crowley
Staff Environmental Specialist

Courier

Cc: See attached document distribution list

Attachment:

ENVIRONMENTAL CONDITIONS ASSESSMENT - DELIVERABLE SCHEDULE

Tronox LLC - Henderson, Nevada

Revised: July 15, 2006

Deliverable	Date
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 Further revisions will be completed as needed following additional data collection activities
Data Usability Evaluation (including review of <i>Supplemental Phase II Report</i>) * KM response to NDEP July 28, 2005 comments	June 17, 2005 – Submitted Address in revised Data Usability Evaluation due after Source Area Evaluation is conducted.
Source Area Evaluation (SAE) * Phase A Work Plan * Phase A Work Plan Meeting	September 30, 2005 – Conceptual approach submitted. October 3, 2005 – NDEP approved conceptual approach October 21, 2005 – Workplan schedule submitted. February 28, 2006 - Workplan submitted April 11, 2006 – Scoping meeting conducted May 16, 2006 – Scoping meeting conducted June 15, 2006 – Scoping meeting conducted
Background Study Work Plan * Tronox Response to NDEP May 6, 2005 Comments * Tronox Response to NDEP July 28, 2005 Comments * Upgradient Investigation Workplan * Upgradient Investigation Workplan Addendum	March 30, 2005 – Submitted July 22, 2005 – Submitted Address in revised workplan September 30, 2005 – Submitted October 4, 2005 errata sheets submitted February 28, 2006 – Submitted.
Upgradient Investigation Report	120 days following field sampling completion. Original due date of July 28, 2006 delayed. Provide NDEP revised due date by July 21, 2006
PERIODIC MONITORING AND REPORTING	
ECA Phase II Status Report (Quarterly)	July 15; October 15
Perchlorate Remediation Performance Report (Quarterly)	July 28; October 28
Chromium Remediation Performance Report (Semi-Annually)	July 28; January 28, 2007