



Susan Crowley
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April 15, 2010

Ms. Shannon Harbour
Bureau of Corrective Actions
Nevada Division of Environmental Protection
2030 East Flamingo Road, Suite 230
Las Vegas, Nevada 89119

Dear Ms. Harbour:

Subject: Tronox LLC, NDEP Facility ID # H-000539
ECA Quarterly Activity Report – First Quarter 2010

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: 1-01-10 to 3-31-09

ECA

- January 6 – NDEP / Tronox / NGE / Chartis project update teleconference.
- January 7 – NDEP issues request for Tronox response regarding "sale parcel" environmental investigation and remediation.
- January 12 – "All-Companies" teleconference.
- January 13 – NDEP / Tronox / NGE / Chartis project update teleconference.
- January 20 – NDEP / Tronox / NGE / Chartis project update teleconference.
- January 20 – NDEP issues comments regarding the Phase B Area I DVSR.
- January 21 – Tronox transmits to NDEP – Revised submittal schedule for remaining Phase B DVSRs.
- January 22 – NDEP provide response to Tronox's revised submittal schedule for Phase B DVSRs.
- January 25 – NDEP / Tronox / NGE / Exponent teleconference regarding asbestos exposure areas.
- January 27 – NDEP issues comments regarding the Draft Interim Capture Zone Evaluation and Vertical Delineation report.
- January 28 – NDEP issues response to the Human Health Risk Assessment Work (HHRA) Plan preparation schedule.
- February 3 – Tronox transmits to NDEP – Technical Memorandum – Justification for using an adjustment factor for dioxin bio-availability in soil.
- February 4 – Tronox transmits to NDEP – Schedule for Capture Zone Evaluation submittals.
- February 5 – Tronox transmits to NDEP – Revised submittal schedule for the HHRA Work Plan.
- February 5 – NDEP / Tronox / NGE Charts meeting regarding Phase B Area analytical results.
- February 9 – Tronox transmits to NDEP – Submittal schedule for Remedial Schedule.
- February 9 – NDEP responds to Tronox schedule for HHRA Work Plan.

Tronox. Adding value beyond the product.

- February 9 – NDEP issues edits to the HHRA Work Plan.
- February 9 – NDEP issues response to Technical Memorandum – Justification for using an adjustment factor for dioxin bio-availability in soil.
- February 9 – NDEP issues second comments regarding the revised Phase B Area DVSR submittal schedule.
- February 10 – NDEP / Tronox / NGE / Chartis project update teleconference.
- February 11 – Tronox transmits to NDEP – Technical Memorandum – Protocol for Bio-Accessibility Method for Dioxin / Furan in Soil.
- February 11 – Tronox transmits to NDEP – Soil Gas Technical Memorandum and supporting documents.
- February 12 – Tronox transmits to NDEP – Phase B Area II DVSR.
- February 12 – NDEP / Tronox / NGE meeting regarding Phase B Area and groundwater analytical results.
- February 12 – NDEP issues approval of the Revised Phase B Area I DVSR.
- February 16 – NDEP issues comments regarding the Technical Memorandum – Protocol Bio-Accessibility Method for Dioxin / Furan in Soil.
- February 17 – NDEP / Tronox / NGE teleconference regarding Soil Gas Technical Memorandum.
- February 17 – NDEP / Tronox / NGE teleconference regarding soil leaching and DAF calculations.
- February 18 – Tronox transmits to NDEP – Phase B Area IV DVSR.
- February 18 – Tronox transmits NDEP – draft Remedial Schedule.
- February 18 – NDEP issues comments regarding the Phase B Area II DVSR.
- February 18 – Tronox / NGE transmits to Dave Gratson – EQUS files for preparation of the Supplemental Sampling DVSR.
- February 19 – NDEP issues final minutes regarding soil leaching and DAF teleconference.
- February 19 – NDEP issues final minutes regarding the Soil Gas Technical Memorandum teleconference.
- February 19 – Tronox transmits to NDEP – Phase B Area III DVSR.
- February 19 – NDEP / Tronox / NGE / Chartis project update teleconference.
- February 19 – Tronox transmits to NDEP – Submittal schedule for soil leaching Technical Memorandum.
- February 19 – NDEP issues comments regarding the HHRA Work Plan.
- February 19 – NDEP issues comments regarding the draft Remedial Schedule.
- February 22 – NDEP / Tronox / NGE teleconference regarding pre-confirmation sampling.
- February 22 – Tronox transmits to NDEP – available information regarding the on-site slurry wall construction.
- February 23 – NDEP / Tronox / NGE teleconference regarding HHRA Work Plan.
- February 23 – NDEP issues final minutes for the February 5th Phase B Area results review meeting.
- February 23 – NDEP issues comments regarding the In-Vitro Protocol, with Tronox concurrence of needed modifications.
- February 24 – NDEP issues Soil Physical and Chemical Property Measurement and Calculation Guidance.
- February 24 – Tronox transmits to NDEP – Revised Capture Zone Evaluation Work Plan.
- February 24 – Tronox submits to NDEP – Submittal schedule for Technical Memorandum comparing methods for analyzing fine grains (ASTM C117 to ASTM D4464).
- February 25 – NDEP / Tronox / NGE / Chartis project update teleconference.
- February 25 – Tronox transmits to NDEP – Phase B Groundwater DVSR.
- February 25 – NDEP issues final minutes for the February 12th Phase B Area results review meeting.
- February 26 – Tronox transmits to NDEP – Submittal schedule for the Bio-Accessibility Technical Memorandum.
- February 26 – NDEP issues final minutes from February 12, 2010 meeting.

- February 26 – NDEP issues comments on Phase B Area III DVSR.
- February 28 – NDEP issues Water Level Electronic Data Deliverable Format Guidance.
- February 28 – NDEP issues NDEP-Required Electronic Data Deliverable Format Guidance.
- March 1 – NDEP issues final minutes of the February 22nd meeting regarding pre-confirmation sampling.
- March 1 – Tronox transmits to NDEP – Technical Memorandum comparing ASTM methods for analyzing fine grains.
- March 1 – Tronox transmits to NDEP – Revised Remedial Schedule.
- March 3 – NDEP / Tronox / NGE / Chartis project update teleconference.
- March 5 – NDEP issues comments regarding the Remedial Schedule.
- March 8 – NDEP / Tronox / NGE meeting regarding Remedial Schedule.
- March 8 – NDEP issues final minute for the February 23rd teleconference regarding the HHRA Work Plan.
- March 8 – NDEP issues comments regarding February 24th Capture Zone Evaluation Work Plan.
- March 8 – NDEP issues comments regarding the Phase B Area IV DVSR.
- March 8 – Tronox transmits to NDEP – Technical Memorandum Soil Leaching to Groundwater.
- March 9 – Tronox transmits to NDEP – Final HHRA Work Plan.
- March 9 – Tronox transmits to NDEP – Draft Pre-confirmation Sampling Work Plan.
- March 11 – NDEP issues comments regarding Remedial Schedule.
- March 11 – NDEP issues approval of March 8th Technical Memorandum comparing ASTM methods for analyzing fine grains.
- March 11 – NDEP issues revised Soil Physical and Chemical Property Measurement and Calculation Guidance.
- March 11 – NDEP / Tronox / NGE teleconference regarding Remedial Schedule.
- March 12 – NDEP / Tronox / NGE / Chartis project update teleconference.
- March 16 – NDEP issues approval of the March 9th HHRA Work Plan.
- March 17 – NDEP issues approval of Phase B Area III DVSR.
- March 17 – Tronox transmits to NDEP – Revised Remedial Schedule.
- March 17 – NDEP issues comments regarding Pre-Confirmation Sampling Work Plan.
- March 19 – NDEP / Tronox / NGE / Chartis project update teleconference.
- March 19 – Tronox transmits to NDEP – Near-term schedule for soil removal on sale parcels following NDEP approved Remedial Action Work Plan.
- March 19 – Tronox transmits to NDEP – Revised Pre-Confirmation Sampling Work Plan.
- March 22 – NDEP issues approval (with comments) for the March 19th Revised Pre-Confirmation Sampling Work Plan.
- March 23 – Tronox transmits to NDEP – Revised Capture Zone Evaluation and Vertical Delineation Report including RTC.
- March 24 – Tronox transmits to NDEP – Phase B Groundwater DVSR.
- March 24 – Tronox transmits to NDEP – Revised schedule for sale parcel soil removal.
- March 24 – NDEP issues comments regarding the Phase B Groundwater DVSR.
- March 25 – NDEP / Tronox / NGE / Chartis project update teleconference.
- March 25 – Tronox transmits to NDEP – Final Pre-Confirmation Sampling Work Plan.
- March 26 – Tronox transmits to NDEP – Revised Capture Zone Evaluation Work Plan.
- March 26 – Tronox transmits to NDEP – Revised Fact Sheet.

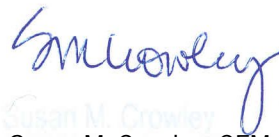
- March 29 – NDEP issues comments regarding March 3rd Technical Memorandum – Soil Leaching to Groundwater.
- March 29 – Tronox transmits to NDEP – Submittal schedule for response to NDEP's comments regarding the Phase B Groundwater DVSR.
- March 29 – Tronox transmits to NDEP – Remedial Soil Flushing Work Plan.
- March 30 – NDEP issues approval of the March 25th Pre-Confirmation Sampling Work Plan.
- March 30 – Tronox transmits to NDEP – Final Indoor Air Quality Sampling Work Plan.

Other:

- January 6 – Tronox transmits to NDEP – Perchlorate Removed from the Environment report for December 2009.
- February 26 – Tronox transmits to NDEP – Semi-Annual Remedial Performance Report for Perchlorate and Chromium.
- March 29 – NDEP issues comments regarding the February 26th Semi-Annual Remedial Performance Report for Perchlorate and Chromium.

Please feel free to call me at (702) 651-2234 office or (702) 592-7727 cell, if you have any questions regarding this information. Thank you.

Sincerely



Susan M. Crowley, CEM 1428 exp 3-8-11

Overnight Mail

Cc: See attached document distribution list



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Document Distribution

Tronox Document Distribution List

Updated: 15-Apr-10

Document Name: ECA Quarterly Update - addressee highlighted in yellow

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Croft	Todd	NDEP			
King	Val	NDEP			
Najima	Jim	NDEP		X	
Lovato	Greg	NDEP		X	
Sous	Nadir	NDEP			
Tinney	Al	NDEP			
Palm	Jon	NDEP			
Harbour	Shannon	NDEP	X	X	
Black	Paul	Neptune		X	
Hackenberry	Paul	Hackenberry		X	
Copeland	Teri			X	
Gratson	Dave	Neptune		X	
Otani-Fehling	Joanna	Neptune		X	
Pohlmann	Brenda	COH		X	
Conaty	Barry	COH Counsel		X	
Mulroy	Pat	SNWA			
Goff	Mike	SNWA			
Liesing	Joe	SNWA			
Kaplan	Mitch	EPA, Reg 9		X	
Compliance Coordinator		NDEP			
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Crowley	Susan	Crowley Environmental	X	X	
Skromyda	Mike	Tronox		X	
Bailey	Keith	Environ Answers		X	
Krish	Ed	Hydrogeologist		X	
Chambers	Deni	Northgate		X	
Leavitt	Alan	Northgate		X	
Donnelly	Dara	Northgate		X	
Willis	Derrick	Northgate		X	
Arnold	Cindy	Northgate		X	
Lambeth	Jeff	Veolia			
Baker	Ken	AIU		X	
Diebenow	Julie	AIU		X	
Giroux	Barry	GEI		X	
Gibson	Jeff	AmPac		X	
Stowers	Kirk	Broadbent			
Sahu	Rahnijit	BMI		X	
Crouse	George	Syngenta		X	
Erickson	Lee	Stauffer		X	
Kelly	Joe	Montrose			
Sundberg	Paul	Montrose		X	
Gibson	Jeff	AmPac			
Richards	Curt	Olin		X	
Bellotti	Michael	Olin		X	
Wilkinson	Craig	Timet		X	
Mack	Joel	Montrose Counsel			