



Susan Crowley
CEM - 1428

(702) 651-2234
Fax (405) 302-4607
susan.crowley@tronox.com

July 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: ECA Quarterly Activity Report – Second Quarter 2010
Tronox LLC, NDEP Facility ID # H-000539**

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: 4-01-10 to 6-30-10

ECA

- April 5 – Tronox submits revised remedial Schedule including a response to comments (RTC).
- April 7 – Tronox submits a revised Phase B Groundwater DVSR including an RTC and revised EDD.
- April 7 – Tronox submits the Perchlorate removed from the Environment Report for Jan to Mar 2010.
- April 8 – NDEP / Tronox / NGE teleconference re 3-30-10 RAW and 4-5-10 Remedial Schedule.
- April 9 – NDEP provides comments regarding the Tronox Indoor Air Quality Investigation Work Plan.
- April 9 – Tronox provides notice to NDEP that "parcel" soil remediation is delayed due to weather.
- April 12 – NDEP issues response to Tronox's notice re parcel remediation, a method change for dioxin analyses and change of manganese dioxide tails excavation / transportation contractor.
- April 13 – NDEP issues finals minutes for the 4-8-10 teleconference re the RAW and the Remedial Schedule.
- April 13 – Tronox submits response to NDEP comments (3d and 4d) re the 4-5-10 Remedial Schedule.
- April 14 – NDEP / Tronox / NGE WebEx teleconference re shallow soil background.
- April 14 – NDEP issues approval of Tronox's Phase B Groundwater DVSR – Rev 1.
- April 15 – Tronox submits 1st Quarter 2010 ECA Activity Report.
- April 15 – NDEP provide comments re Tronox's 2-24-10 Proposal for Demonstration of Perchlorate Treatment within Groundwater Using an Injected Permeable Reactive Barrier.
- April 15 – Tronox submits a Technical Memorandum re COPC Selection for RZ-A for discussion.
- April 15 – NDEP holds All Companies teleconference to discuss issues common to all BMI companies.
- April 16 – NDEP / Tronox / NGE WebEx teleconference re Capture Zone Evaluation Work Plan.
- April 16 – NDEP issues comments re Tronox's Soil Flushing WP
- April 19 – NDEP issues comments re Tronox's updated Factsheet.
- April 22 – Tronox submits a Revised Indoor Air Quality Investigation Work Plan including a RTC.

Tronox. Adding value beyond the product.

- April 22 – Tronox submits an Errata for the Pre-confirmation Sampling Work Plan.
- April 22 – Tronox submits a revised Technical Memorandum re NDEP comment #1 on the Pre-Confirmation Sampling Work Plan including a RTC to NDEP's 3-22-10 comments on the Technical Memorandum.
- April 23 – Tronox submits the Technical Memorandum: Results of the Bio-Accessibility Study for Dioxin and Furans in Soil.
- April 27 – NDEP / Tronox / NGE / Chartis update teleconference.
- April 29 – Tronox submits a revised Factsheet based upon NDEP 4-19-10 comments.
- April 30 – NDEP issues final minutes for the 4-16-10 WebEx teleconference re the Capture Zone Evaluation.
- April 30 – NDEP / Tronox / NGE teleconference re background.
- April 30 – Tronox submits the Hydrogeologic Modeling Work Plan.
- April 30 – Tronox submits additional information re the bio-accessibility calculations.
- April 30 – NDEP issues approval of Tronox's 4-22-10 Indoor Air Quality Investigation Work Plan.
- April 30 – NDEP issues comments re Tronox's 3-23-10 Interim Groundwater Capture Evaluation and Vertical Delineation Report.
- May 3 – NDEP issues comments re Tronox's 4-23-10 Technical Memorandum: Results of the Bio-Accessibility Study for Dioxin and Furans in Soil.
- May 4 – Tronox submits the Remedial Action Work Plan for Phase B Soil Remediation of Remediation Zones RZ-B to RZ-E.
- May 5 – Tronox submits an updated Remediation Schedule.
- May 6 – Tronox begins transport of historic manganese dioxide tails to Republic Industrial Landfill, Apex, NV.
- May 6 – Tronox submits an activity update re implementation of the Capture Zone Evaluation Work Plan.
- May 11 – Tronox submits the RZ-A Human Health Risk Assessment.
- May 11 – NDEP issues final minutes re 4-30-10 teleconference on background discussion.
- May 12 – NDEP issues comments re Tronox's 5-4-10 Remedial Action Work Plan for Phase B Soil Remediation of Remediation Zones RZ-B through RZ-E.
- May 13 – NDEP / Tronox / NGE / Chartis update teleconference.
- May 13 – NDEP provides comments re Tronox's 3-30-10 Technical Memorandum – Screening Level Indoor Air Health Risk Assessment for 2008 Tronox Parcel A / B Soil Gas Investigation.
- May 14 – NDEP issues final minutes re the 4-15-10 All Companies teleconference.
- May 17 – Tronox submits RTC re NDEP 4-30-10 comments on the Interim Groundwater Capture Evaluation and vertical Delineation Report.
- May 17 – NDEP / Tronox / NGE teleconference re dioxin sampling depth and bio-accessibility.
- May 20 – NDEP / Tronox / NGE teleconference re Tronox's Revised Report: Results of Bio-Accessibility Study for Dioxins and Furans in Soil.
- May 24 – NDEP / Tronox / NGE teleconference re hydrogeologic modeling activities.
- May 24 – Tronox submits an Errata for the Revised Report: Results of Bio-Accessibility Study for Dioxins and Furans in Soil.
- May 24 – NDEP issues final minutes for the teleconference re dioxin sampling depth and bio-accessibility.
- May 24 – NDEP issues final minutes for the teleconference re dioxin bio-accessibility.
- May 25 – NDEP provides comments re Tronox's 4-29-10 Hydrogeologic Modeling Work Plan.
- May 25 – NDEP provides comments re Tronox's 5-24-10 Revised Results of the Bio-Accessibility Study for Dioxin and Furans in Soil.

- May 25 – NDEP / Tronox / NGE teleconference re NDEP comments on the Tronox Hydrogeologic Modeling Work Plan.
- May 27 – Tronox submits a schedule for providing a RTC re NDEP's 5-13-10 comments on the Tronox Parcel A / B Soil Gas Investigation.
- May 27 – Tronox submits a Revised Work Plan to Evaluate In-Situ Flushing of Perchlorate Impacted Soil.
- May 27 – NDEP provides approval of the Technical Memorandum – Screening Level Indoor Air Health Risk Assessment for 2008 Tronox Parcel A / B Soil Gas Investigation.
- June 2 – Tronox submits Technical Memorandum re Dioxin Surface Soil Sampling Rational.
- June 4 – Tronox submits an updated Remedial Schedule.
- June 4 – NDEP transmits AmPac water level information to Tronox.
- June 4 – NDEP provides comments re Tronox's 6-1-10 letter on Environmental Covenants, Institutional and Engineering Control Plan.
- June 8 – Tronox submits a Revised Hydrogeologic Modeling Work Plan.
- June 9 – Tronox submits a Revised Environmental Covenants, Institutional and Engineering Control Plan.
- June 9 – NDEP approves the Tronox 6-2-10 Dioxin Surface Soil Sampling Rational.
- June 9 – NDEP issues comments re Tronox's Removal Action Work Plan for Phase B Soil Remediation of Remediation Zones RZ-B through RZ-E.
- June 9 – NDEP provides comments re Tronox's 5-11-10 RZ-A Human Health Risk Assessment.
- June 10 – Tronox submits Excavation Plan for Phase B Soil Remediation of RZ-B, Addendum to the Remedial Action Work Plan.
- June 11 – Tronox submits a Technical Memorandum re Evaluation of Soil Leaching to Groundwater.
- June 15 – Tronox submits a schedule for surface soil sampling for dioxins.
- June 14 – NDEP issues comments re Tronox's 6-3-10 Proposed Indoor Air Sampling Locations – Supplement to the 4-22-10 Indoor Air Quality Investigation Work Plan.
- June 15 – NDEP / Tronox / NGE teleconference re RZ-B Excavation Plan.
- June 15 – Tronox submits the Parcel Remediation DVSR.
- June 15 – Tronox submits the Supplemental Shallow Sampling DVSR.
- June 16 – Tronox submits a Technical Memorandum clarifying the Indoor Air Quality Investigation Work Plan re proposed indoor air sampling locations.
- June 16 – NDEP issues final minutes of the 6-15-10 teleconference re RZ-B Excavation Plan.
- June 17 – NDEP issues initial comments re the RZ-B Excavation Plan.
- June 18 – NDEP approves the Tronox Indoor Air Quality Investigation with it's clarifying proposed air sampling locations 6-16-10 information.
- June 21 – Tronox submits a Technical Memorandum re Relative Risk Reduction Associated with Arsenic Removal in RZ-B-9 and RZ-B-6.
- June 21 – Tronox submits Excavation Plan for Phase B Soil Remediation of RZ-D, Addendum to the Remedial Action Work Plan.
- June 21 – NDEP approves the Tronox 5-27-10 Work Plan to Evaluate In-Situ Soil Flushing of Perchlorate Impacted Soil.
- June 21 – NDEP issues final minutes for the 5-25-10 teleconference re Tronox's Hydrogeologic Modeling Work Plan.
- June 22 – NDEP issues comments re Tronox's 6-10-10 Excavation Plan for Phase B Soil Remediation of RZ-B, Addendum to the Removal Action Work Plan.

- June 22 – Tronox submits a Revised RZ-A Human Health Risk Assessment.
- June 22 – Tronox submits an Errata to the Remedial Action Work Plan.
- June 23 – NDEP issues comments re Tronox's 6-21-10 Technical Memorandum: Relative Risk Assessment Associated with Arsenic Removal in RZ-B-9 and RZ-B-6.
- June 24 – NDEP / Tronox / NGE / Chartis update teleconference.
- June 28 – NDEP issues response to Tronox's 2-12-10 letter re Seep Access Issues.
- June 29 – Tronox submits a Revised Technical Memorandum re Parcel A / B Soil Gas Investigation.

Other:

- April 22 – Tronox submits an RTC re NDEP 3-29-10 comments on the Tronox Semi-Annual Remedial Performance Report for Perchlorate and Chromium.
- April 27 – NDEP responds to Tronox 4-22-10 RTC re the 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

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