

TRONOX

Susan Crowley
Staff Environmental Specialist

RECEIVED
ENVIRONMENTAL PROTECTION
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October 16, 2006

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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 – Third 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, 07-01-2006 to 09-30-2006

Conceptual Site Model:

- CSM remains unchanged until additional data justifies revisions

Upgradient Investigation Results:

- July through September – Tronox worked with MWH lab and other subcontracted labs to finalize data packages resulting from the Upgradient Investigation sampling.
- July through September – The draft *Upgradient Investigation Results Report* is undergoing internal review and is scheduled for delivery to NDEP October 31, 2006.

Source Area Work Plan

- July through September – 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.
- July through September – Tronox continued to revise the Source Area Workplan, based upon NDEP comments.
- July 13 – Tronox met with NDEP to discuss scope of Source Area Investigation.
- August 22 – 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.
- July 15 – Tronox issued 1st Quarter ECA Status Report to NDEP
- July 27 – Tronox submits *Quarterly Performance Report – Perchlorate Recovery Program, April – June 2006*. This report included the discussion of the ART-9 collection well (Next performance report due on January 28, 2007 and will likely be combined with the chromium performance report).

Tronox LLC

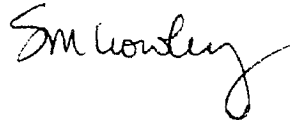
8000 West Lake Mead Parkway, Henderson, Nevada 89015 • P.O. Box 55, Henderson, Nevada 89009

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- July 27 – Tronox submits *Semi-Annual Performance Report – Chromium Mitigation Program, January – June 2006*. (Next performance report due on January 28, 2007 and will likely be combined with the perchlorate performance report).
- September 30 – Tronox submits site wide *Quality Assurance Project Plan and Standard Operating Procedures*.
- July 13 – Tronox, NDEP and ENSR met to discuss the status of ECA Activities.
- August 22 – 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,

A handwritten signature in black ink, appearing to read "SM Crowley". The signature is fluid and cursive, with a large loop at the end of the last name.

Susan M. Crowley
Staff Environmental Specialist

Courier

cc: See attached document distribution list

Attachment: ECA Deliverable Schedule

ENVIRONMENTAL CONDITIONS ASSESSMENT - DELIVERABLE SCHEDULE

Tronox LLC - Henderson, Nevada

Revised: October 16, 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 * Source Area Investigation	September 30, 2005 – Conceptual approach submitted. October 3, 2005 – NDEP approved conceptual approach October 21, 2005 – Workplan schedule submitted. February 28, 2006 - Workplan submitted October 2, 2006 – Workplan Submitted November 1, 2006 scheduled start of field work
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.
Quality Assurance Project Plan Standard Operating Procedures	September 30, 2006 - Submitted September 30, 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 Revised due date October 31, 2006
PERIODIC MONITORING AND REPORTING	
ECA Phase II Status Report (Quarterly)	October 15, January 15, 2007
Perchlorate Remediation Performance Report (Quarterly)	July 28; October 28, January 28, 2007
Chromium Remediation Performance Report (Semi-Annually)	July 28; January 28, 2007