# TRONOX

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January 15, 2008

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

Dear Mr. Rakvica:

Subject: Tronox LLC ECA Quarterly Report - Fourth Quarter 2007

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: 10-01-07 to 12-31-07

## Conceptual Site Model:

CSM remains unchanged until additional data justifies revisions.

## Upgradient Investigation Results:

September 27 – Tronox transmitted their response to NDEP comments (RTC) regarding the Upgradient
Investigation report. This RTC included a revised executive summary, revised conclusions, and revised
statistical histograms to NDEP. This revised information was used during preparation of the Phase A report,
discussed below.

## Phase A and B - Source Area Investigation

- November 26 Teleconference between NDEP and Tronox to discuss the Phase B Work Plan in relation to risk based decision making.
- November 29, 2007 Tronox and NDEP meet to discuss the Phase A Source Area Investigation Results Report
  and the scope of work for the Phase B Source Area Investigation Workplan.
- November 30 NDEP provides response to Tronox's 9-27-07 Phase A Source Area Investigation Results Report.
- December 17 NDEP provides approval of Appendix G, DVSR, from Phase A Source Area Investigation Results Report.
- December 19 Tronox provides draft LOU 20 description to NDEP for comment, with the LOU 20 map and analytical tables to follow.

#### QAPP and SOPs:

October - December - NDEP-approved BRC SOPs are in use.

#### Community Involvement Plan and Fact Sheet

December 19 - Tronox provides NDEP a copy of the revised Fact Sheet for the Henderson site.

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Work Plan to Evaluate Effective Groundwater Capture

- October 3 NDEP provides comments on the Revised Work Plan to Evaluate Effective Groundwater Capture.
- October 31 Teleconference between NDEP and Tronox to discuss Environmental Conditions Assessment topics, including the Capture Evaluation Work Plan.
- November 14 Teleconference between NDEP and Tronox to discuss Work Plan to Evaluate Effective Groundwater Capture.
- November 28 Tronox submits responses to NDEP comments on Work Plan to Evaluate Effective Groundwater Capture.
- December 11 NDEP provide approval of the Work Plan to Evaluate Effective Capture, with noted exceptions.
- December 2 to 19 Tronox initiates work to complete well installations and rehabilitations as part of the Work Plan to Evaluate Effective Groundwater Capture. Work will resume in February 2008.

#### Other

- October 5 NDEP provides comments to Tronox's Annual Remedial Performance Report dated August 29, 2007.
- October 15 Tronox issues 3<sup>rd</sup> Quarter 2007 ECA Status Report to NDEP.
- November 7 Tronox attends NDEP-sponsored meeting to discuss McGinley report on Athens Road Groundwater modeling.
- November 9 Tronox provides a revised DVSR to NDEP for the Annual Remedial Performance Report analytical in response to NDEP 9-19-07 comments.
- November 26 NDEP provides approval of revised DVSR for the Annual Remedial Performance Report.
- December 7 NDEP provides notice to the BMI companies regarding the disparity between datasets using different extraction methods for isotopic uranium analysis.
- December 10 Tronox provides estimated perchlorate removed from the environment to NDEP.
- December 10 Tronox provides Northshore Road perchlorate concentration and mass loading to NDEP.

Feel free to call me at (702) 651-2234, if you have any questions. Thank you.

Sincerely,

Susan M. Crowley

Staff Environmental Specialist

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