

Meeting Minutes

Project: Tronox (Trx) ECA
Location: Tronox Henderson Facility
Time and Date: 1:30 PM, Thursday, June 15, 2006
Meeting Number: ---
In Attendance: NDEP-BCA – Brian Rakvica, Shannon Harbour
Tronox – Keith Bailey, Susan Crowley, Tom Reed via phone
ENSR – Sally Bilodeau, Dave Gerry via phone
GEI - Barry Giroux via phone

CC: Jim Najima, Todd Croft

1. The meeting was held to discuss the ECA Scope of Work, particularly the Source Area Phase A Work Plan and Upgradient Investigation.
2. Tronox continues to wait for delivery of several lab reports and as a result, delivery of the Upgradient Investigation Report will be delayed. NDEP requested that Trx issue a letter at least one week before the July 28 due date to establish a revised due date for the report.
3. Discussed the conceptual Source Area Phase A Work Plan.
 - a. Trx provided three tables and a map identifying proposed source area sampling locations, rationale and strategy for analytical tests.
 - i. Table 1 summarized each LOU and identified the chemicals expected to have been generated at each LOU.
 - ii. Table 2 documented the rationale for broad site sampling of unknown constituents as discussed in the May meeting.
 - iii. Table 3 consolidated results from the first two tables to generate the SRC sampling plan including 24 borings
 - b. NDEP suggested adding additional clarification to Table 3 by including rationale for each boring location. For example, why a boring is located on the east side of a building as opposed to the west or south. NDEP noted that this type of institutional knowledge will tie the workplan to the CSM. Trx will put additional information in column 2 and may also include text in the Work Plan as needed.
 - c. General discussion regarding State Industries and noted that this was the location of the historic cyanide release.
 - d. It was noted that the AP storage area outdoors utilized drums. No AP was stored loose.
 - e. NDEP indicated that surface sampling for pesticides generally appears reasonable so long as additional sampling at depth is included for those areas where there is known or suspected handling of pesticides (e.g. locations SA-4 and SA-13), or where surface flows might have transported pesticides (e.g. the Beta ditch). NDEP also clarified that Trx should consider sliding SA-4 to the south.

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- f. NDEP agreed that the low solubilities for dioxins and furans make groundwater analyses for those constituents unnecessary and is consistent with what is being done on adjacent properties.
 - g. NDEP stated that sampling asbestos only at the surface and not sampling groundwater for asbestos is consistent with what is being done on adjacent properties.
 - h. NDEP stated that these tables along with the Work Plan text should help to clarify the rationale for the source area sampling and to make it more traceable and transparent.
4. Discussed the chromium semi-annual report comment letter (February 2, 2006) and the requested format and content changes to the chromium and perchlorate reports (June 13, 2006 letter).
- a. NDEP emphasized that the format and content changes identified in the June 13th letter are long-term requests and Trx is not necessarily expected to address these changes in the next report. These changes are being requested to make the reports from all BMI parties more uniform and useful. Modifying the conditions specified in the historic consent orders and AOCs will not be a problem from NDEP's standpoint, but will require a letter from Tronox requesting the change in original sampling requirements.
 - b. Trx stated that the chromium report for the July submittal has been revised to address the February 2, 2006 NDEP comments and some of the maps generated in this report may also address the June 13th requests. Trx reported that the perchlorate report is not scheduled to be revised for July delivery. As stated above, NDEP has stated that Trx may view the requested changes from the June 13th letter as long-term requests.
 - c. Trx stated that during the Upgradient Investigation, Trx completed a comparison of low-flow purging and sampling versus bailing and will include an evaluation of their comparability in the Upgradient Investigation report. Trx indicated they sample many wells annually for chromium, TDS or SC, and perchlorate and stressed that these constituents are not significantly affected by the bailing versus low-flow purging and sampling methods. While micro-purge pumps in some wells might be preferred to bailing, installing micro-purge pumps in all Trx wells would be a major expense and perhaps be unnecessary. NDEP stated they would review the comparison done between bailing and low-flow purging and sampling. NDEP also stated Trx should consider evaluating each well currently included in the sampling schedule for the possibility of requesting reduction in monitoring and/or sampling. NDEP also noted that dedicated pumps do not need to be installed in all wells.
 - d. NDEP suggested Trx use a database transfer of information to drawings. Trx indicated that a large EQUIS database of analytical data (NDEP's original direction) is maintained and Trx is working on using a program to electronically upload data to tables and maps.
 - e. NDEP clarified that future annual groundwater reports will probably be large and comprehensive but that the quarterly reports could be much

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smaller and simpler with fewer maps included as needed to support updates. Trx questioned the usefulness or need for quarterly maps for chromium or perchlorate data as this data does not change appreciably over a quarter. NDEP suggested that this be discussed in a TBD meeting to cover the NDEP's letter.

5. Next Meeting: July 13, 2006 at 10:30 PM at Trx, Henderson. The meeting time has been moved to earlier in the day to accommodate a meeting later in the day...