

Meeting Minutes

Project: Tronox (Trx)
Location: Tronox Henderson Facility
Time and Date: 1:30 PM, Tuesday August 22, 2006
Meeting Number: ---
In Attendance: NDEP-BCA – Brian Rakvica, Shannon Harbour
Tronox – Keith Bailey, Susan Crowley, Rick Stater (for part of the meeting) and Tom Reed (via phone)
ENSR – Dave Gerry, Sally Bilodeau and Robert Kennedy (via telephone)

CC: Jim Najima, Todd Croft, Dave Gratson, Teri Copeland

1. The meeting was held to discuss the overall ECA Scope of Work, particularly the Source Area Investigation Phase A Work Plan and the upcoming delivery of the Upgradient Investigation Report.
2. For the Upgradient Investigation, Tronox has completed the Data Validation memos and is preparing a summary. The memos and summary will be included as an appendix to the report and validation will also be discussed in the body of the report.
3. NDEP requested that an electronic version of the database used for validation also be provided to NDEP for David Gratson (Neptune). NDEP clarified that the electronic database should only include the relevant portion of the database (that is the portion that is being validated). Tronox stated the data are in Equis 3 format which is compatible with Microsoft Access.
4. Regarding the Upgradient Study, Keith Bailey stated the EMAX lab had not met the hexavalent chromium digestate analysis time of 24 hours (per January 2006 agreement with NDEP) for 20 samples. The samples were extracted within 24 hours but were then analyzed between 2 and 4 days later. These samples were from two boreholes and all the results were non-detect. The US EPA has indicated that once extracted, the extract for hexavalent chromium analysis is stable for up to 168 hours or more. Brian Rakvica requested that Tronox note that the data are qualified, for example with a "UJ" qualifier but that they did not need to be rejected. NDEP to verify with Neptune (ACTION ITEM). It will not be necessary to redrill the boreholes and collect new samples.
5. It was agreed that the Phase A work plan can specify a 4 day analysis for hexavalent chromium, following extraction. NDEP to verify with Neptune (ACTION ITEM).
6. Discussed the conceptual Source Area Phase A Work Plan.
 - a. Each proposed borehole location was visited on August 16, 2006 and some were adjusted slightly to accommodate surface features or to address access difficulties. Trx showed the revised boring location map to the NDEP.
 - b. Trx clarified the radium 226 will not be a gamma analysis.

- c. Trx clarified that the data quality limits (DQLs) will be 0.1 of the industrial PRG. The residential PRGs will not be applied to the site. It was agreed that 0.1 of the soil screening level (SSL) was desirable but that Trx would use standard laboratory methods and if the lowest limit the lab could reasonably provide is above that it would be acceptable to the NDEP.
 - d. Nevada certification of labs is required by the State, however, not all of the methods being proposed have been certified in Nevada. NDEP does not want the lack of lab certification to be an impediment to getting the site characterized. NDEP requested that if some of the lab methods are not certified, that Trx inform NDEP, make a note that the certification is in process (submitted to NDEP) and proceed.
7. Trx discussed the upcoming delivery of the QAPP. It was stressed that the FSAPs would be the specific work plans submitted for the different phases of work, for example the Upgradient Investigation Work Plan and the Phase A Source Area Investigation Work Plan. NDEP stressed that one overarching QAPP with associated SOPs will be reviewed and used for the project. Separate QAPPs will not be submitted with each workplan. Trx to review the BMI FSP/SOP document with special attention to the introduction. BMI explains how the FSP/SOP document fulfills some of the requirements of a USEPA FSP and how the other requirements will be addressed by specific FSAPs. Trx will revise the submittal in progress to reflect this clarification.
8. Trx would like to be in the field doing the Source Area Investigation Phase A sampling by November 1, 2006. At present the Source Area Workplan (SAW) will be submitted to NDEP October 2, 2006 and NDEP indicated they would attempt to get review comments back to Trx by Oct 16.
9. Total Petroleum Hydrocarbon analysis (Gasoline and diesel range GRO/DRO) analysis is no longer required by the NDEP in groundwater so it will be removed from the Phase A Work Plan.
10. Some SNWA perchlorate data collected near Las Vegas Wash are inconsistent and some samples have apparently been collected in wrong sample locations. For that reason, at this time, the NDEP does not want Trx to include these analyses in the Perchlorate or Chromium Performance reports. Las Vegas Wash data will need to be included in the next major revision to the CSM.
11. September 14, 2006 there will be a meeting between Trx and NDEP to discuss how to combine the Chromium and Perchlorate reports. At that time, the schedule for the next reports will be discussed.
12. The AP-5/Effluent Clarity construction project is proceeding on schedule. The new Fluidized Bed Reactor is operational and the sand filter will be started shortly to meet the August 31, 2006 deadline in the Administrative Order on Consent.
13. Athens Road well line perchlorate capture will improve with tie-in of the ART 9 well. Tie-in is scheduled next month.

14. On-site interceptor line perchlorate capture may be improved by adding an additional well South of existing well I-B (at the west end of the interceptor line). The new well would be similar to the large bore I-AR well now in service.
15. Trx stated they needed the BMI background report data electronically to do the statistical comparisons and NDEP stated they would assist in getting the information. The following day Sally reported they had found the electronic data on the CD provided and can use that for the statistical comparisons. No action by NDEP is needed.
16. NDEP and Trx discussed possible long range plans for soil and groundwater remediation.
17. Next Meeting: Wednesday, October 11, 2006 at 1:30 pm at the Tronox Facility, Henderson, NV.