

## Meeting Minutes

**Project:** Tronox (TRX)  
**Location:** Conference Call  
**Time and Date:** 9:00 AM, May 14, 2007  
**In Attendance:** NDEP-BCA – Brian Rakvica, Shannon Harbour, Todd Croft  
Tronox – Keith Bailey, Susan Crowley

CC: Jim Najima

1. This conference call was held to discuss a variety of issues including NDEP's March 29, 2007 comment letter Re: *Semi-Annual Performance Report for Chromium and Perchlorate*.
2. Semi-Annual Report comment letter:
  - a. TRX requested clarification on whether the NDEP was expecting the Semi-Annual report to be revised and resubmitted. NDEP stated that the only deliverables requested in the March 29<sup>th</sup> letter are the groundwater capture report and a response to comments document.
  - b. TRX will submit a response to comments document and incorporate the NDEP's comments into future reports.
3. Nevada MCLs:
  - a. TRX receiving guidance from two branches of NDEP. BCA was not aware of the Nevada contaminant standards prior to the submittal of Draft Table 3-2.
  - b. NDEP stated that Federal secondary standards typically don't require compliance. NDEP noted that the primary and secondary requirements could be located within the NAC and the requirements should be reviewed by TRX.
  - c. Brian Rakvica sent an e-mail to TRX stating that the NDEP would not conduct a full review of Table 3-2 until the Phase A report is submitted. NDEP had provided a number of examples of issues with Table 3-2 in the aforementioned email. The NDEP does not intend to conduct a line-by-line review for quality control of the table's contents. TRX requested that they be informed of any errors that NDEP has observed on any of the draft submittals.
  - d. TRX will reissue Table 3-2 revised to address NDEP's comments to date.
  - e. TDS:
    - i. TRX is concerned about the requirement to remediate groundwater to drinking water standards when no exposure pathways exist for this groundwater.
    - ii. NDEP stated that the groundwater would have to be specifically exempted from the non-degradation policy by the administrator of NDEP. Without this exemption it is not clear how TRX could avoid compliance.

- iii. Background TDS concentrations were discussed and NDEP stated that the southern edge of the BMI complex along Lake Mead exhibits concentrations in the as low as 700 mg/L, which is less than the 1,900 mg/L Beneficial Use Standard for Las Vegas Wash. NDEP additionally stated that TRX should be thinking how they are going to handle their TDS for their permits, especially NPDES renewal because of SCOP project removing significant flow from Las Vegas Wash. TRX stated that Jim Hogan (NDEP-BWPC) will be conducting 2-year review of current NPDES permit in November 2007. TRX has already begun investigating mass balance for Las Vegas Wash and Colorado River System.
  - iv. NDEP briefly explained AMPAC's UIC permit restrictions on TDS and other constituents.
  - f. TRX requested information on how the other BMI companies have handled the TDS issue. NDEP stated that PSSM is looking at reinjection of their treated effluent into the highly contaminated portion of their plume. PSSM is additionally looking at revising the Parson's report on the costs vs. benefits associated with the treatment of TDS.
4. TRX has received NDEP's comments on the Phase I report. Ron Sahu of BRC will be responding.