

Meeting Minutes

Project: Tronox (TRX)
Location: Conference Call
Time and Date: 8:00 AM, Thursday March 27, 2008
In Attendance: NDEP – Brian Rakvica, Shannon Harbour
Tronox – Susan Crowley
Environmental Answers – Keith Bailey (for TRX)

CC: Jim Najima, Teri Copeland, Paul Black, Paul Hackenberry

1. The meeting was held to discuss various issues including the Phase B Work Plan (WP) submittals and sale parcels A, B, C, D, F, G, and H (Parcels).
2. TRX stated that the submittal schedule submitted last week should be modified. The Phase B WPs will be submitted one week later than proposed. The submittal schedule will now be as follows:
 - a. Phase B, Area 1 – April 4, 2008
 - b. Phase B, Area 4 – April 18, 2008
 - c. Phase B, Area 3 – May 2, 2008
 - d. Phase B, Area 2 – May 16, 2008
 - e. Alluvial Groundwater Background Sampling – May 30, 2008 Groundwater sampling for the entire site, including the proposed sales parcels, will be included in the four area work plans. Background alluvial groundwater sampling is needed, but since alluvial water does not extend upgradient of the site, cross-gradient sampling will be needed.
3. TRX has received NDEP's approval of the Soil Gas Survey WP and will begin implementation as soon as possible.
4. TRX stated that the objective of the Phase B WPs is to both sample worst case source area locations and to bound the limits of the source areas identified on-site. TRX is concerned about consistency of review by the NDEP and its consultants, for example: comments last year requested bounding sources, while more recent comments on a set of five LOUs recommended not establishing source area bounds in the Phase B work plan.
5. TRX stated that they are not anticipating or proposing any deeper soil characterization on the sale Parcels.
 - a. TRX has conducted and proposed characterization to address specific pathways for risk assessment: 0 to 10 feet below ground surface (fbgs) to address the direct contact pathway and soil gas survey for indoor air pathway. Groundwater sampling will be performed on a site-wide basis including sales parcels.
 - b. TRX stated that if 0 to 10 fbgs is not impacted then there shouldn't be any deeper contamination other than that associated with groundwater.
 - c. NDEP responded that for contaminants (such as organics), concentrations could actually increase with depth given the conditions at the site.
 - d. TRX believes that there would also be a corresponding increase in the groundwater concentration if there was deeper soil contamination.
 - e. NDEP stated that there could be a difference between Parcels A, B, C, and D and Parcels F, and G because the latter may contain source areas.

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- f. TRX concurred that Parcels F and G may have deeper impacts and will check groundwater to determine any impact. If groundwater is not being increasingly impacted across Parcels F & G, deep soil samples may not be needed.
6. NDEP and TRX discussed Parcel I (Nevada Pic-A-Part).
 - a. David Christensen has hired a CEM.
 - b. TRX has the expectation that the site will be restored to “pre-occupation conditions”.
 - c. NDEP and TRX were in agreement that any data collected for the Pic-A-Part cleanup should be supportive of an NFA.
 - d. NDEP will use the data from Parcels A and B to support the CSM for Parcel I.
7. NDEP reported that the Revised Technical Memorandum for Parcels A and B was still in review. NDEP to follow-up on the status of the review. **ACTION ITEM.**
8. TRX reported that there were asbestos detections on Parcels C and D.
9. NDEP will check to see if there are any files on the former Koch Asphalt facility that was located at the TRX site. **ACTION ITEM.**
10. TRX will review the Request for Time Extension of Combination TRX Remedial Project Reports dated February 22, 2007 to see if they have a NDEP-signed modification request. If located, TRX will supply to NDEP for inclusion in the TRX file. If TRX cannot locate this document, they will follow-up with Bill Frey. **ACTION ITEM.**
11. TRX believes the Parcel investigations are considered part of ECA (Phase II AOC) requirements. NDEP stated that prioritization of certain areas have been assigned by TRX but the site was divided into smaller areas at the behest of the NDEP and the same process ECA process (ECA analytical suites, NDEP approval of work, etc.) has been and will be applied to the entire site.