

Meeting Minutes

Project: Tronox (TRX)
Location: Conference Call
Time and Date: 1:30 PM, May 8, 2008
In Attendance: NDEP – Brian Rakvica, Shannon Harbour
Tronox –Susan Crowley
Environmental Answers – Keith Bailey (for TRX)

CC: Jim Najima

1. The meeting was held to discuss future Phase B submittals and NDEP's comments to the *Phase B, Source Area Investigation Work Plan, Area I (Northern LOUs), Tronox LLC Facility, Henderson, Nevada* (Phase B Area I SAP).
2. The following are TRX's response to comments (RTCs) regarding NDEP's May 6, 2008 Response to the Phase B Area I SAP:
 - a. RTC 1, TRX will add requested text.
 - b. RTC 2, TRX acknowledges this comment.
 - c. RTC 3, TRX will clarify plans for preparing a Human Health Risk Assessment including whether the BRC closure plan approach will be used
 - d. RTC 4, TRX stated that broad suite analyses are proposed for currently operating LOUs to provide "baseline" conditions in these areas and if the current operations do not exacerbate contamination future closure would not require sampling for the full SRC list. TRX stated that if a chemical is not detected and is also not a part of the process, then TRX proposes not to conduct future investigations for this chemical.
 - e. RTC 5, TRX stated that they are planning a human health risk assessment (HHRA) and will add text to future Phase B SAPs.
 - f. RTC 6, TRX stated that deep borings will be advanced in Parcels F (3 borings), G (2 borings), and the small triangular section on the east side of C (1 boring). TRX is not planning any deep characterization in the other Parcels (A, B, C, D, and H).
 - g. RTC 7, TRX will use Region VI MSSLS per NDEP's guidance.
 - h. RTC 8.a, TRX stated that the sample Tables do not show PCB analyses, but TRX will check the text and revise as necessary. NDEP noted that text in Appendix A, LOU packets stated that PCB would be sampled in groundwater monitoring well M-123.
 - i. RTC 8.b, TRX stated that radium will be analyzed using alpha and beta spectrometry.
 - j. RTC 9.a, TRX will modify the table at the bottom of page 2-7 as requested.
 - k. RTC 9.b.i, TRX will run EPA Method 1312 using 2 preparation methods: 1) with reagent water and 2) with reagent water at pH 5.00 ± 0.05 .
 - l. RTC 9.b.ii, TRX stated that pH will be analyzed in the field. Laboratory pH will not meet hold times.
 - m. RTC 9.c, TRX acknowledges this comment.
 - n. RTC 9.d, TRX proposes to sample from the alluvium and Muddy Creek formation for the SPLP tests.
 - o. RTC 9.e, TRX will revise the sample locations.
 - p. RTC 9.f, TRX acknowledges this comment and will revise the sampling locations.
 - q. RTC 9.g, TRX does not agree with this comment. Leaching tests are designed to provide data on movement of SRCs through the alluvium and Muddy Creek soils. Data

from the tests can be used for multiple locations, making it unnecessary to perform a leach test at each LOU.

- r. RTC 9.h, TRX stated that the SPLP samples may be used for modeling in the HHRA.
- s. RTC 10, TRX acknowledges this comment and will remove Section 3.
- t. RTC 11, TRX will collect two samples from any sample with 10 NTU or greater. One sample will be field filtered the other will not. NDEP noted that this procedure should be consistent with the BRC SOPs.
- u. RTC 12, TRX acknowledges this comment and will schedule a meeting with NDEP to discuss the Phase B report once data are validated. NDEP will provide guidance at the meeting on use of appropriate statistical tests.
- v. RTC 13, TRX acknowledges this comment. If additional investigation work is required, an addendum to the work plan will be proposed.
- w. RTC 14, TRX acknowledges this comment.
- x. RTC 15.a, TRX acknowledges this comment and will modify text and/or tables as necessary.
- y. RTC 15.b, TRX will modify text and/or tables as necessary.
- z. RTC 15.c, TRX stated that OCPs will be sampled and analyzed in soils and at the capillary fringe. OCP samples will be collected at other proposed sampling depths but will be placed on hold pending the results of the surface and capillary fringe samples.
- aa. RTC 15.d, TRX acknowledges this comment.
- bb. RTC 15.e, TRX will add requested text.
- cc. RTC 15.f, TRX does not agree with this comment. However, TRX noted that this comment does not change anything substantive in the Phase B Area I SAP. Evaluation of LOU 32 could simplify future closure (see RTC 4 above).
- dd. RTC 15.g, TRX acknowledges this comment and will add the SVOC analysis in SA66 and TPH-DRO/ORO to SA67.
- ee. RTC 15.h, TRX acknowledges this comment and will modify the table as necessary.
- ff. RTC 15.i, TRX acknowledges this comment and will modify the table as necessary.
- gg. RTC 15.j, TRX acknowledges this comment and will modify the table as necessary.
- hh. RTC 16.a and b, TRX will modify the table to add a column for the soil type(s) expected across the screened interval of each groundwater monitoring well. If the screen interval crosses the AA/MCF interface, TRX will note which unit the sampled groundwater is expected to represent. For example, if the screened interval was 90% AA and 10 % MCF, TRX would note that the groundwater collected would be expected to represent AA conditions. NDEP clarified that it is interested in determining potential bias of the samples where the well screen covers more than one soil type.
- ii. RTC 16.c, TRX acknowledges this comment.
- jj. RTC 16.d, TRX will review (see RTC 8a).
- kk. RTC 17, TRX acknowledges this comment.
- ll. RTC 18, TRX acknowledges this comment and will discuss in revised work plans (see RTC for comment 16.a and b).
- mm. RTC 19, TRX acknowledges this comment and will modify the figure as necessary.
- nn. RTC 20, TRX acknowledges this comment and will modify the plate as necessary. TRX noted and the NDEP agreed that if TRX updates Plate A of the Phase B Area I SAP, then the individual figures for the Appendix A LOU packets do not need to be revised.

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- oo. RTC 21.a - k, TRX acknowledges this comments and will modify the overall figure as necessary. Individual LOU figures in the Area I work plan will not be revised. .
 - pp. RTC 21.l, TRX stated that the former acid drain system is located at 10 – 20 fbs in places and that excavation with a backhoe is very difficult due to collocated utilities. TRX believes that the former acid drain system is constructed of relatively short segments (approximately 5 to 6 ft lengths) and therefore sampling anywhere along the pipeline should be representative of possible worst case scenario conditions. TRX will check the length of the pipe segments, the construction material of the pipe, and the location of other utilities prior to the advancement of these borings.
 - qq. RTC 21.m, TRX acknowledges this comment and will revise Plate A in lieu on any revisions to the LOU figures.
3. TRX stated that they will provide errata for the Phase B Area I SAP, as needed.
 4. TRX stated that the Phase B, Area VI SAP was being revised per NDEP's comments and would be submitted by May 19, 2008.
 5. TRX will consider consolidating Phase B, Areas II and III into one SAP that will be submitted in mid-June.
 6. TRX stated that the soil gas field work has commenced.
 7. TRX stated that the field work for the Phase B Area I SAP should commence after Memorial Day.