

## Meeting Minutes

**Project:** Tronox (TRX)  
**Location:** Conference Call  
**Time and Date:** 1:00 PM, Monday, June 23, 2008  
**In Attendance:** NDEP – Brian Rakvica, Shannon Harbour  
Tronox –Susan Crowley  
Environmental Answers – Keith Bailey (for TRX)  
ENSR –Carmen Schnell, Mike Flack (for TRX)

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

1. The meeting was held to discuss NDEP’s June 18, 2008 comment letter Re: Phase B Source Area Investigation Work Plan Area IV (Western and Southern LOUs), Tronox LLC, Henderson, Nevada – dated May 16, 2008 (Phase B Area IV SAP).
2. The following are TRX’s response to comments (RTCs) regarding NDEP’s May 6, 2008 Response to the Phase B Area IV SAP.
  - a. RTC 1, TRX will revise Table 2 of the Phase B SAPs for Areas I and IV accordingly to address this comment.
  - b. RTC 2, TRX will attempt to locate the general location of the Former Acid Drain System (LOU 60) using the drop boxes (manholes) as a guide. If LOU 60 is encountered, then TRX will sample from immediately below the Drain as identified in the core as specified in NDEP’s comment. It was also noted that the material of construction for the pipe is “acid-resistant vitrified clay tile”.
  - c. RTC 3, TRX acknowledges this comment and will address in future Phase B SAP submittals.
  - d. RTC 4, TRX acknowledges this comment and will address in future Phase B SAP submittals.
  - e. RTC 5, TRX acknowledges that this is a variation on the BRC SOP and will use soil gas to investigate the vapor intrusion pathway for a human health risk assessment (HHRA).
  - f. RTC 6, TRX is currently developing the HHRA work plan. Lisa Bradley of ENSR will continue to try and contact NDEP’s consultants, Paul Black and Teri Copeland, to discuss HHRA development.
  - g. RTC 7, TRX acknowledges this comment and will address in future Phase B SAP submittals.
  - h. RTC 8, TRX acknowledges this comment.
  - i. RTC 9, TRX acknowledges this comment and will address in the Phase B Report and in the HHRA Work Plan.
  - j. RTC 10, TRX acknowledges this comment and will address in future Phase B SAP submittals.
  - k. RTC 11, please see RTC 1.
  - l. RTC 12, TRX acknowledges this comment and will address in future Phase B SAP submittals.
  - m. RTC 13.a, TRX acknowledges this comment and will address in future Phase B SAP submittals. TRX will assume that total cyanide concentration is equal to the free

- cyanide concentration in the HHRA initially. If the cyanide concentrations indicate an unacceptable health risk, TRX may pursue alternate sampling and analysis.
- n. RTC 13.b, TRX will conduct both Aroclor and congener sampling for PCBs. TRX acknowledges that Area I sampling for PCBs will be sampled for both Aroclor and congeners.
  - o. RTC 13.c, TRX acknowledges that they will not be using gamma spectroscopy for the Phase B sampling.
  - p. RTC 14, TRX acknowledges this comment and will address in future Phase B SAP submittals.
  - q. RTC 15, TRX will send an erratum for page 2-8.
  - r. RTC 16, TRX acknowledges this comment and will address in future Phase B SAP submittals by using the wording “variable conditions”.
  - s. RTC 17, TRX acknowledges this comment and will address in future Phase B SAP submittals by stating that TRX will follow the USEPA Soils Screening Guidance and acknowledged that modeling will likely be completed. It was noted that VLEACH is not an ideal model for non-VOCs.
  - t. RTC 18, TRX has currently proposed to collect total organic carbon, which TRX will use to calculate the fraction of organic carbon as necessary.
  - u. RTC 19.a, TRX will complete this table and submit to NDEP in the Phase B Area II SAP.
  - v. RTC 19.b, TRX will add the latest SRC List approval date of June 3, 2008.
  - w. RTC 19.c.i, TRX will attempt to add details to the rationale for boring selection as time allows. It was noted that this issue needs to be brought to closure before the HHRA but not necessarily before the SAP implementation. NDEP is assuming that TRX has used site history to determine that the sample locations are ‘worst case’.
  - x. RTC 19.c.ii, see RTC 19.c.i. NDEP noted that this comment should be addressed before the submittal of the HHRA.
  - y. RTC 19.c.iii, TRX will revise Table 2 by checking the appropriate boxes in the Geotechnical Tests column.
  - z. RTC 19.c.iv, see RTC 19.c.i.
  - aa. RTC 19.c.v.1, TRX acknowledges this comment and will revise Table 2 accordingly.
  - bb. RTC 19.c.v.2, TRX acknowledges this comment and will revise Table 2 accordingly. TRX noted that Table 2 for Area I will not need to be revised for this comment as the analyses listed for Wet Chemistry contain cyanide analysis.
  - cc. RTC 19.c.v.3, TRX acknowledges this comment and will revise Table 2 accordingly.
  - dd. RTC 19.d.i, TRX acknowledges this comment.
  - ee. RTC 19.d.ii, TRX stated that Soil Type column in Table 3 provides the requested information and that all of the wells to be sampled will be in the first water bearing zone. NDEP noted that this is not obvious as wells screened in certain lithologies (e.g. UMcF-fg1 are not necessarily “first water” across the Site).
  - ff. RTC 19.d.iii, TRX acknowledges that the wells indicated as “upgradient” are not a part of the Water Table Aquifer Background SAP, which will be submitted under separate cover.
  - gg. RTC 19.e, TRX acknowledges this comment.
  - hh. RTC 19.f, TRX acknowledges this comment.

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- ii. RTC 20.a, TRX indicated that all of the wells shown are within the first water bearing zone.
  - jj. RTC 20.b, TRX will include additional wells.
  - kk. RTC 20.c, TRX will include a general groundwater direction arrow.
  - ll. RTC 21.a, b, and c, TRX will investigate the location of LOU 66 and provide a figure to NDEP. NDEP noted that the ownership of the tank as well as the location is important.
  - mm. RTC 22.a, TRX acknowledges this comment and will address in future Phase B SAP submittals.
  - nn. RTC 22.b, TRX acknowledges this comment and will address in the Phase B Report.
  - oo. RTC 22.c, TRX will reference the 1 ppb ATSDR value for dioxin.
  - pp. RTC 22.d, TRX will revise the LOU table for consistent units in future Phase B SAP submittals. TRX noted that the units were included in the LOU packages as reported in the original reports. TRX did not want to modify the data as originally reported.
  - qq. RTC 22.e, TRX will revise the LOU tables on future SAPs to include only EPA Region VI MSSSLs.
  - rr. RTC 22.f, TRX acknowledges this comment and will address in future Phase B SAP submittals.
  - ss. RTC 22.g.i, TRX acknowledges this comment and will address prior to the submittal of the HHRA.
  - tt. RTC 22.g.ii, TRX acknowledges this comment and will collect wipe and chip samples for LOU 27. The wipe samples will be collected using the BRC SOP. The chip samples will be collected using EPA Region I, Draft SOP for Sampling Concrete in the Field dated December 30, 1997. NDEP to provide a copy of this SOP to TRX.
- ACTION ITEM.**
- uu. RTC 22.g.iii, TRX acknowledges this comment.
  - vv. RTC 22.g.iv.1-3, TRX acknowledges this comment and will revise Table 2 and Plate A accordingly.
  - ww. RTC 22.h, TRX acknowledges this comment and will revise Table 2 and Plate A accordingly.
  - xx. RTC 22.i.i, TRX acknowledges this comment and will attempt to locate the borings associated with LOU 59 adjacent to the storm drain.
  - yy. RTC 22.i.ii-v, TRX acknowledges this comment and will revise Table 2 and Plate A accordingly.
  - zz. RTC 22.j.i, TRX acknowledges this comment and will attempt to locate borings over the acid drain lines.
  - aaa. RTC 22.j.ii, TRX identified the construction material as 6-inch diameter, vitrified clay tile (5 – 6 foot long segments) and will include this information in future SAP submittals.
  - bbb. RTC 22.j.iii, TRX acknowledges this comment and will revise Table 2 and Plate A accordingly.
  - ccc. RTC 22.j.iv, TRX acknowledges this comment and will revise Table 2 and Plate A accordingly.
  - ddd. RTC 22.k.i, TRX noted that Building T-5 is an active area. TRX will submit a figure showing the location of Buildings T-4, T-5, and T-8.
  - eee. RTC 22.k.ii.1, see RTC 22.k.i

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- fff. RTC 22.k.ii.2-4, TRX stated that the location of the conveyance piping to/from the former LOU 62 ponds, the conveyance piping to the Former Acid Drain System from LOU 62, and the sanitary sewer from LOU 62 are unknown at this time. TRX will investigate and will submit a figure showing the locations or approximate locations of these items if the information is available.
  - ggg. RTC 22.k.iii, TRX acknowledges this comment.
  - hhh. RTC 22.1, TRX will submit a figure that shows the location of LOU 66. TRX stated that if this LOU is not on TRX property then TRX is not responsible for this LOU. NDEP clarified that the ownership of the tank is also an issue, per above.
3. TRX will submit the following errata for the Phase B Area IV Report **by July 11, 2008**:
    - a. Page 2-8
    - b. Table 2
    - c. Table 3
    - d. Plate A
    - e. State Industries (LOU 62) Figure
    - f. Flintkote Company (LOU 66) Figure
  4. TRX stated that all revisions will be reflected in Phase B Area II and Area III SAPs.
  5. TRX stated that the Phase B Area II and Area III SAPs will be submitted to the NDEP **by June 30, 2008**. NDEP will endeavor to have comments on the Phase B Areas II and III SAPs by August 1, 2008 to allow field work to continue on an uninterrupted basis.
  6. TRX stated that the following revisions that affect Phase B Area I SAP will be made immediately and that a revised Table 2 for Phase B Area I SAP will be submitted to the NDEP.
    - a. TRX will change the surface sampling depth for all analyses except asbestos to 0 – 0.5 fbgs.
    - b. TRX will note that PCBs will be sampled for both Aroclor and congener analysis.
    - c. TRX will note that the SPLP samples will be analyzed using both the reagent water and pH 5.0 reagent water prep methods.
  7. TRX stated that the field work for the soil gas survey has been completed with no reported problems with the direct push sampling.
  8. TRX stated that the asbestos sampling for Area I has been completed, the Area I groundwater sampling has commenced, and the Area I soil sampling is scheduled to commence on June 24, 2008.