

# TRONOX

Susan Crowley  
Staff Environmental Specialist

RECEIVED  
ENVIRONMENTAL PROTECTION  
LAS VEGAS OFFICE

(702) 651-2234  
Fax (405) 228-6882  
scrowley@kmg.com

October 14, 2005

2005 OCT 14 P 3:44

Mr. Brian Rakvica, P.E.  
Nevada Division of Environmental Protection  
1771 East Flamingo Road, Suite 121-A  
Las Vegas, Nevada 89119

Dear Mr. Rakvica:

Subject: Tronox LLC ECA Quarterly Report – Third Quarter 2005

Pursuant to Section XIII of the Consent Agreement, signed September 5, 1996, between Nevada Division of Environmental Protection (NDEP) and Tronox LLC (Tronox), formerly Kerr-McGee Chemical LLC (Kerr-McGee), formerly Kerr-McGee Chemical Corporation, submits the following quarterly status report for the Henderson facility's Environmental Conditions Assessment (ECA).

Activities Conducted, 7-1-05 to 9-30-05

Conceptual Site Model:

- August 30 – Kerr-McGee submits responses to NDEP May 6, 2005 comments on the facility's *Conceptual Site Model* (CSM).
- September 6 – NDEP provides comments on Kerr McGee's August 30, 2005 responses to the CSM comments. Tronox to respond by October 14, 2005.

Upgradient Investigation Work Plan:

- July 22 - Kerr-McGee submits response to NDEP comments on the *Upgradient Investigation Work Plan* (UIWP) (UIWP submitted to NDEP on March 20, 2005).
- July 28 – NDEP provides comments on Kerr-McGee's July 22, 2005 responses to NDEP earlier comments on UIWP.

Data Usability Assessment:

- July 28 – NDEP provides comments to the *Data Usability Assessment*, but does not require response until future ECA field work and data collection is underway.

Source Area Evaluation

- September 30 – Kerr-McGee submits a conceptual approach for a Source Area Evaluation.
- October 3 – NDEP concurs with Kerr-McGee's conceptual approach to the Source Area Evaluation, with comments.

Other

- July 12 – NDEP and Kerr-McGee (with ENSR via telephone) meet to discuss the ECA activities' status.

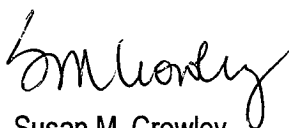
Tronox LLC

8000 West Lake Mead Parkway, Henderson, Nevada 89015 • P.O. Box 55, Henderson, Nevada 89009

- July 27 – Kerr-McGee submits *Semi-Annual Performance Report – Chromium Mitigation Program, January to June 2005* (Semi-Annual Report).
- July 28, 2005 – NDEP provides Kerr-McGee comments on the July 27, 2005 Semi-Annual Report.
- August 15 – NDEP and Kerr-McGee (with ENSR) meet to discuss the ECA activities' status.
- September 28 – NDEP and Kerr-McGee (with ENSR via telephone) meet to discuss the ECA activities' status.

Please note that attached is Tronox's ECA "*Deliverable Schedule*" which tracks recent activities as well as lists expectations for future activities. Feel free to call me at (702) 651-2234, if you have any questions. Thank you.

Sincerely,



Susan M. Crowley  
Staff Environmental Specialist

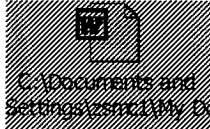
Hand Carried

Cc: Public Repository  
Jeff Johnson, NDEP  
Todd Croft, NDEP  
Mitch Kaplan, EPA Region IX  
Val King, NDEP  
Jim Najima, NDEP  
Jon Palm, NDEP  
Brenda Pohlmann, COH  
Barry Conaty, COH  
Ron Sahu, BMI  
Carrie Stowers, CCCP  
Paul Sundberg, Montrose  
Al Tinney, NDEP  
Craig Wilkinson, TIMET  
Keith Bailey, Kerr-McGee  
Sally Bilodeau, ENSR  
Pat Corbett, Kerr-McGee  
John Dixon, Kerr-McGee  
Brad Dougherty, AIG  
Dave Gerry, ENSR

Brian Rakvica  
October 14, 2005  
Page 3

Ed Krish, ENSR  
Tom Reed, Kerr-McGee  
Don Shandy, Kerr-McGee  
Rick Stater, Kerr-McGee

Attachment:



## ENVIRONMENTAL CONDITIONS ASSESSMENT - DELIVERABLE SCHEDULE

### Tronox LLC - Henderson, Nevada

Revised: October 14, 2005

Deliverable	Date
Project Organizational Chart / Resumes * Revision 1: Response to NDEP Comments of June 11, 2004 * Revision 2: Inclusion of Keith Bailey, Kerr-McGee, on project team.	May 15, 2004 – Submitted July 6, 2004 – Approved July 9-, 2004 October 30, 2005 – Pending
Site-Related Chemical List (Report) * Revision 1: Response to NDEP Comments of June 21, 2004 * Revision 2: Response to NDEP Comments of August 5, 2004 * Revision 3: Response to NDEP Comments of September 29, 2004	June 15, 2004 – Submitted July 22, 2004 – Submitted September 27, 2004 – Submitted October 26, 2004 – Approved October 27, 2004
Conceptual Site Model * KM Response to NDEP May 6, 2005 Comments * KM Response to NDEP September 6, 2005 comments	February 28, 2005 – Submitted August 31, 2005 – Submitted October 14, 2005 – Submitted
Data Quality Objectives	March 30, 2005 – Delayed until CSM comments and responses are finalized.
Data Usability Evaluation (including review of <i>Supplemental Phase II Report</i> ) * KM response to NDEP July 28, 2005 comments	June 17, 2005 – Submitted  Address in revised Data Usability Evaluation due after Source Area Evaluation is conducted.
Source Area Evaluation (SAE) * SAE Phase A Work Plan	September 30, 2005 – Conceptual approach submitted. October 21, 2005 – Schedule for Phase A Work Plan due to NDEP.
<b>BACKGROUND STUDY</b>	
Background Study Work Plan * KM Response to NDEP May 6, 2005 Comments * KM response to NDEP July 28, 2005 Comments * Upgradient Investigation Workplan	March 30, 2005 – Submitted July 22, 2005 – Submitted Address in revised workplan September 30, 2005 – Submitted – RTC pending
Upgradient Investigation Field Sampling	120 days following NDEP approval of Work Plan
Upgradient Investigation Report	120 days following field sampling completion
<b>PERIODIC MONITORING AND REPORTING</b>	
ECA Phase II Status Report (Quarterly)	January 15 ; April 15; July 15 and October 15
Perchlorate Remediation Performance Report (Quarterly)	January 28; April 15; July 28 and October 28
Chromium Remediation Performance Report (Semi-Annually)	January 28; July 28



## Letter of Transmittal

RECEIVED  
ENVIRONMENTAL PROTECTION  
LAS VEGAS OFFICE

2005 OCT 18 P 1:01

---

**ATTENTION:**

**DATE:**

October 14, 2005

✓  
Brian Rakvica, NDEP  
Jeff Johnson, NDEP  
Susan Crowley, Kerr-McGee  
Public Repository (co Susan Crowley)  
Keith Bailey, Kerr-McGee

---

**PROJECT REFERENCE:**

**PROJECT NUMBER:**

04020-023

Kerr-McGee Chemical LLC, Henderson

**WE ARE SENDING YOU THE FOLLOWING:**

<u>Number of Originals</u>	<u>Number of Copies</u>	<u>Description</u>
--------------------------------	-----------------------------	--------------------

1		Set of errata sheets and a revised CD for Upgradient Investigation Workplan, Kerr-McGee Facility, Henderson, Nevada
---	--	---

**REMARKS:**

Enclosed for your information and or files are the errata sheets and revised CD for the report referenced above. Based on discussions with NDEP pages 3-3, 3-4, 4-5, 4-6, 4-11, 6-1 and 6-2 of the text have been modified. Tables 2, 3, and 4 have also been modified; Table 6 was inadvertently omitted from the previous version of the report. Please note that these corrections do not address all of the issues raised on the NDEP October 6, 2005 comments letter. Remaining outstanding issues will be addressed in a separate submittal.

---

Sincerely,

*Dave Gerry and Sally Bilodeau*

1220 Avenida Acaso  
Camarillo, CA 93012  
(805) 388-3775  
FAX: (805) 388-3577