



Susan Crowley  
Staff Environmental Specialist

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October 15, 2008

Ms. Shannon Harbour  
Nevada Division of Environmental Protection  
2030 East Flamingo Road, Suite 230  
Las Vegas, Nevada 89119

Dear Ms. Harbour:

Subject: Tronox LLC ECA Quarterly Activity Report – Third Quarter 2008

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

Activities Conducted: 07-01-08 to 09-30-08

Conceptual Site Model:

- August 4 2008 NDEP provided comments on Tronox's Proposed Hydrostratigraphic Nomenclature – BMI Complex and Common Areas, dated June 27, 2008.
- September 29, 2008 Tronox responded to the NDEP comments on hydrostratigraphic nomenclature.
- Tronox developed three block diagrams for use in the capture evaluation which will support the CSM.

Upgradient Investigation Results:

- September 15, 2008 NDEP approved Tronox's request to extend the due date for Background Water Quality Work Plan Outline.

Phase A and B - Source Area Investigation

- July 8, 2008 Tronox submitted response to NDEP comments re the All Companies Vapor Intrusion Report (DVSR and Database).
- July 11, 2008 Tronox provided NDEP a response to NDEP comments re the Phase B Work Plan Area IV, Tables 2&3 and Plate A via Leapfile and hard copy.
- July 14, 2008 Tronox delivered ECA Quarterly Activity Report - Second Quarter 2008.
- July 21, 2008 Tronox received NDEP comments re: Phase B Areas I, II, III, and IV Work Plans.
- July 23, 2008 Tronox provided NDEP a mapped status of the Phase B Area I sample locations collected as of July 8, 2008.
- August 25, 2008 Tronox submitted the DVSR Phase B Source Area Investigation, Soil Gas Survey, Tronox LLC, Henderson, NV to NDEP.
- September 17 and 18, 2008 Tronox received NDEP comments re: the Phase B Soil Gas DVSR Report.
- September 26, 2008 NDEP approved extended due date for the Tronox revision of Area Work Plans to October 13, 2008.

**Tronox. Adding value beyond the product.**

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- September 29, 2008 Tronox submitted a response to NDEP comments re: Soil Gas DVSR dated August 25, 2008.
- September 30, 2008 Tronox provided NDEP draft figures, tables and approach for address NDEP comments re: the four Phase B Work Plans – to be used for discussion during October 1, 2008 teleconference.

QAPP and SOPs:

- No activity.

Community Involvement Plan (CIP) and Fact Sheet

- September 25, 2008 NDEP requested Tronox update and resubmit the facility's Fact Sheet by November 10, 2008.

Evaluation of Effective Groundwater Capture

- August 4, 2008 NDEP issued comments re Tronox's Vertical Delineation of Contaminant Plumes and Hydraulic Gradients, dated June 27, 2008.
- September 26, 2008 Tronox provided NDEP a response to NDEP comments re: Vertical Delineation of Contaminant Plumes and Hydraulic Gradients, dated June 27, 2008.

Other

- July 2, 2008 NDEP conditional approval of removal work plan for parcels C, D, F, G, and H
- July 23, 2008 Tronox UIC permit # UNEV94218 Permit 2<sup>nd</sup> Quarter Report.
- July 24, 2008, Tronox DMR 2<sup>nd</sup> Quarter NPDES permit NV0023060 Report.
- August 27, 2008, Tronox submitted the Annual Remedial Performance Report Chromium and Perchlorate July 2007 to June 2008.
- September 19, 2008 NDEP issued renewed UIC permit UNEV94218.

Feel free to call me at (702) 651-2234, if you have any questions. Thank you.

Sincerely



Susan M. Crowley  
Environmental Specialist

Susan M. Crowley, CEM 1428, exp 3-8-09  
Staff Environmental Specialist

Overnight Mail

Cc: See attached document distribution list

Tronox Document Distribution List

Updated: 15-Oct-08

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