

Susan Crowley CEM - 1428 (702) 651-2234 Fax (405) 302-4607 susan.crowley@tronox.com

April 15, 2009

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 - First Quarter 2009

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: 1-01-09 to 3-31-09

Source Area Investigation

- January 5, 2009 NDEP provided comments to Revised Phase B Site Investigation Work Plan dated December 19, 2008
- January 6, 2009 NDEP provided comments to Outline Proposal to Assess Background Water Quality dated December 18, 2008
- January 12, 2009 NDEP provided approval of the DVSR Tronox Parcels C, D, F, G and H Supplemental Investigations dated June through July 2008
- January 16, 2009 Tronox submitted an RTC to NDEP 1-05-09 comments regarding the Revised Phase B Site Investigation Work Plan
- January 16, 2009 Tronox submitted the Proposed Soil Boring Locations to be Sampled for PCBs
- January 16, 2009 NDEP approved of the RTC document for Revised Phase B Site Investigation Work Plan dated January 16, 2009

Other:

- January 6, 2009 NDEP provided all BMI companies with Guidance on Hydrogeologic and Lithologic Nomenclature Unification
- January 15, 2009 Tronox delivered the ECA Quarterly Activity Report for Fourth Quarter 2008
- January 22, 2009 NDEP provided all BMI companies with Guidance on Evaluating Secular Equilibrium at the BMI Complex and Common Areas
- February 6, 2009 NDEP provided all BMI companies with Supplemental Guidance on Evaluating Secular Equilibrium at the BMI Complex and Common Areas
- February 6, 2009 NDEP provided all BMI companies with Guidance on Evaluating Radionuclide Data at the BMI Complex and Common Areas
- February 11, 2009 NDEP provided the latest WAPA report for review
- February 17, 2009 NDEP provided all BMI companies with a User Guide and Tables on Basic Comparison Levels
- February 26, 2009 NDEP provided all BMI companies Data Validation Guidance document

Tronox. Adding value beyond the product.

Shannon Harbour April 15, 2009 Page 2

- February 27, 2009 Tronox submitted the Semi-Annual Remedial Report for Chromium and Perchlorate, July 2008 to December 2008.
- February 27, 2009 NDEP provided all BMI companies with a link to the recent USEPA RAGS Part F
- February 27, 2009 NDEP provided all BMI companies with Guidance on Uniform Electronic Data Deliverables
- March 4, 2009 Meeting minutes provided re a conference call discussing issues that affect all BMI companies
- March 19, 2009 NDEP provided all BMI companies with a Supplemental Guidance on Data Validation
- March 19, 2009 NDEP provided all BMI companies with revisions to Data Validation of Organic Data based on June 2008 National Functional Guidelines for Superfund Organic Methods Data Review - USEPA 540-R-08-01
- March 20, 2009 NDEP responded to Semi-Annual Remedial Performance Report for Chromium and Perchlorate July 2008-December 2008 dated Feb. 27, 2009

Please feel free to call me at (702) 651-2234 office or (702) 592-7727 cell, if you have any questions regarding this information. Thank you.

Sincerely

Guliowlug

Susan M. Crowley, CEM 1428 exp 3-8-11

Overnight Mail

Cc: See attached document distribution list

Tronox Document Distribution List

e-Copy Cvr Only

Document Name:

ECA Quarterly Update

Name		Firm	[Distribution		Name		Firm	Distribution		
(Last, First)			Hard	e-Copy	Cvr Only	(Last, First)			Hard	e-Copy	Cvi
Croft King Najima Rakvica Sous Tinney Palm	Todd Val Jim Brian Nadir Al Jon	NDEP NDEP NDEP NDEP NDEP NDEP NDEP		x x		Corbett Paque Hatmaker Reed Stater Crowley Skromyda	Pat Matt John Tom Rick Susan Mike	Tronox Tronox Counsel Tronox Tronox Tronox Crowley Environmental Tronox	х	X X X X X X X	
Harbour	Shannon	NDEP	Х	Х		Bailey	Keith	Environmental Answers		Х	
Black Hackenberry Copeland Gratson Otani-Fehling	Paul Paul Teri Dave Joanna	Neptune Hackenberry Neptune Neptune				Krish	Ed			X	
Pohlmann Conaty	Brenda Barry	COH COH Counsel		Х		Lambeth	Jeff	Veolia			
						Diebenow Giroux	Julie Barry	AIG GEI		X X	
Mulroy Goff Liesing	Pat Mike Joe	SNWA SNWA SNWA				Stowers Sahu Crouse Erickson Kelly	Kirk Rahnijit George Lee Joe	Broadbent BMI Syngenta Stauffer Montrose		X X X X	
Kaplan Compliance C Compliance C		EPA, Reg 9 NDEP DAQEM		х		Sundberg Gibson Richards Bellotti	Paul Jeff Curt Michael	Montrose AmPac Olin Olin		X X X	
Juma Public Reposit	Ebrahim	CCDAQEM Library		х		Wilkinson Mack	Craig Joel	Timet Montrose Counsel		X	